

CITY OF ALLENTOWN, PENNSYLVANIA

FIVE-YEAR CONSOLIDATED PLAN

FY 2020 to FY 2024

FY 2020 ANNUAL ACTION PLAN

CDBG, ESG & HOME

January 1, 2020 through December 31, 2020

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Contents

Executive Summary.....	4
ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)	4
The Process	9
PR-05 Lead & Responsible Agencies 24 CFR 91.200(b).....	9
PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l).....	10
PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)	24
Needs Assessment	27
NA-05 Overview	27
NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)	30
NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)	39
NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)	47
NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)	51
NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)	56
NA-35 Public Housing – 91.205(b)	58
NA-40 Homeless Needs Assessment – 91.205(c).....	67
NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d).....	72
NA-50 Non-Housing Community Development Needs – 91.215 (f)	76
Housing Market Analysis.....	79
MA-05 Overview	79
MA-10 Number of Housing Units – 91.210(a)&(b)(2).....	81
MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)	89
MA-20 Housing Market Analysis: Condition of Housing – 91.210(a).....	103
MA-25 Public and Assisted Housing – 91.210(b)	109
MA-30 Homeless Facilities and Services – 91.210(c)	113
MA-35 Special Needs Facilities and Services – 91.210(d)	118

MA-40 Barriers to Affordable Housing – 91.210(e)	122
MA-45 Non-Housing Community Development Assets – 91.215 (f)	124
MA-50 Needs and Market Analysis Discussion	137
MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)	139
MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)	143
Strategic Plan	144
SP-05 Overview	144
SP-10 Geographic Priorities – 91.215 (a)(1)	145
SP-25 Priority Needs - 91.215(a)(2)	146
SP-30 Influence of Market Conditions – 91.215 (b)	159
SP-50 Public Housing Accessibility and Involvement – 91.215(c)	177
SP-55 Barriers to affordable housing – 91.215(h)	178
SP-60 Homelessness Strategy – 91.215(d)	180
SP-65 Lead based paint Hazards – 91.215(i)	182
SP-70 Anti-Poverty Strategy – 91.215(j)	185
SP-80 Monitoring – 91.230	187
Expected Resources	188
AP-15 Expected Resources – 91.220(c)(1,2)	188
Annual Goals and Objectives	191
Projects	197
AP-35 Projects – 91.220(d)	197
AP-38 Project Summary	201
AP-50 Geographic Distribution – 91.220(f)	220
Affordable Housing	221
AP-55 Affordable Housing – 91.220(g)	221
AP-60 Public Housing – 91.220(h)	222

AP-65 Homeless and Other Special Needs Activities – 91.220(i).....	225
AP-70 HOPWA Goals– 91.220 (l)(3)	229
AP-75 Barriers to affordable housing – 91.220(j)	230
AP-85 Other Actions – 91.220(k)	232
Program Specific Requirements.....	237

Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The City of Allentown, Pennsylvania, has prepared a Five-Year Consolidated Plan to identify housing and community development needs and to develop specific goals and objectives to address those needs over a five-year period. This Five-Year Consolidated Plan for the City covers the period of January 1, 2020, until December 31, 2024. The Consolidated Plan allows the City to continue to receive federal housing and community development funds as a direct Entitlement from the U.S. Department of Housing and Urban Development (HUD). In order to continue to receive these funds for Fiscal Year 2020, the City of Allentown must submit its Five-Year Consolidated Plan and FY 2020 Annual Action Plan to HUD. The 2020-2024 Consolidated Plan stipulates that the City's Department of Community and Economic Development will administer the community development programs for the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), HOME Investment Partnerships (HOME) Programs, and the Housing Opportunities for Persons with AIDS (HOPWA). The HOPWA program provides social services and rental assistance for persons with HIV and AIDs. The City of Allentown entered into an agreement with the Commonwealth of Pennsylvania to administer its HOPWA program.

The FY 2020-2024 Consolidated Plan describes to HUD how the City of Allentown intends to use federal and non-federal resources to meet community needs. The funds are intended to provide low- and moderate-income households with viable communities by addressing one of HUD's three objectives:

- Provide decent housing;
- Create a suitable living environment; or
- Create economic opportunities.

Eligible activities include community facilities and improvements, roads and infrastructure, housing rehabilitation and preservation, development activities, public services, economic development, planning, and administration.

Program outcomes are designed to show how each activity benefits the community or people served. All activities must provide one of the following benefits:

- Improved Availability/Accessibility;
- Improved Affordability; or
- Improved Sustainability.

Community Development Block Grant funds to address the needs outlined in this Plan are anticipated to be approximately \$2,305,197 for each of the next five years. HOME funds are estimated to be \$975,569 each year, and ESG funds are estimated to be \$198,373.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

Housing Needs:

To maintain and improve the condition of the housing stock to meet or exceed current code standards;

To make available affordable homeownership, within the existing housing stock;

To support the provision of decent, safe, and affordable rental housing within the City and on a regional basis; and

To participate in a regional effort to make available a full array of permanent housing opportunities for special needs populations, to contribute to meeting the shelter and service needs of homeless residents of the City and to assist residents of the City in imminent danger of becoming homeless.

Homeless Needs:

To support prevention strategies that address the root causes of chronic homelessness through the provision of tenant education; rental assistance; job/vocational training; employment services;

To support intervention strategies that include the closure of homeless camps, when possible, and addressing the gaps and barriers in the service delivery system; and

To support infrastructure strategies that include advocating for services, programs, and policies at the local, state, and national levels that enable chronically homeless persons to live as independently as possible.

Community Development Needs:

Revitalizing Allentown's economy through vocational/educational training of City residents, small business loans, and promotion of new activities in the downtown;

Upgrading infrastructure in downtown Allentown through the rehabilitation of public infrastructure including streets, sidewalks, parks and other facilities, to attract businesses and residents; and

Improve neighborhoods by rehabilitating the existing housing stock and creating homeownership and rental housing opportunities.

Non-Homeless Special Needs:

Elderly and Frail:

Continue to support activities that provide affordable housing for elderly and frail elderly residents; and
Continue to support activities that provide the elderly and frail elderly with benefits counseling, care coordination, transportation, and other services.

Mental Illness:

Continue to offer support and assistance to local agencies that provide supportive services and outreach programs to individuals with mental illness; and
Increase the supply of transitional and permanent supportive housing facilities for persons with mental illness and mental disabilities.

Disabled:

Continue to support activities that serve persons with disabilities.

Drug and Alcohol Addiction:

Continue to offer support to local agencies that provide outreach programs to individuals with drug and alcohol problems; and
Increase the supply of transitional and permanent supportive housing for individuals with drug and alcohol addiction.

HIV/AIDS:

Continue to support efforts that provide affordable housing to people living with HIV/AIDS; and
Continue to support organizations that provide supportive services to people living with HIV/AIDS.

3. Evaluation of past performance

The City of Allentown prepared a Consolidated Annual Performance and Evaluation Report (CAPER) for FY2019. This CAPER was the fourth year of the five-year period and reported the FY2019 accomplishments of Allentown's CDBG, HOME and ESG Programs.

The City has consistently met the timeliness goals set by HUD at 1.5 times the City's allocation. This goal is expected to be met for the FY 2019 program year.

In FY2019 the CDBG funds were spent on a variety of activities in the following categories, including Housing Rehabilitation, Public Infrastructure and Public Facilities, Acquisition of Substandard Properties, Code Enforcement, Demolition, Direct Homeownership Assistance, Planning and Administration, and Public Services.

The HOME funds were expended on the following eligible activities, including Administration, CHDO Set-Aside, and Housing New Construction and Rehabilitation.

The ESG grant of was expended on the following eligible activities, including, Administration, Emergency Shelter Support and Rapid-Rehousing.

4. Summary of citizen participation process and consultation process

The goals and strategies for the 2020-2024 Five-Year Consolidated Plan and the 2020 Annual Action Plan were developed in conjunction with a coordinated public and stakeholder outreach process. Citizen participation in the development of the Consolidated Plan and Action Plan was encouraged through participation in the Focus Group meetings, the online community survey, public hearings and review of the Plan during the display period. Citizens were made aware of the process and opportunity to comment on the plan through newspaper advertisements, public hearings, and focus group meetings.

This Consolidated Plan was also informed by a robust public input and participation process that was conducted through 2019 as part of the City's development of its comprehensive and economic development plan known as Allentown Vision 2030. The Allentown Vision 2030 community planning process provided a variety of ways to receive insights, feedback, and ideas for the future of Allentown.

In some phases, the conversation was literal - through interviews and focus groups, Allentonians conveyed their hopes and concerns for the city. In other stages, the planning team created ways to listen, such as a citywide survey that was taken by over a thousand people.

In person, citywide conversations happened through Community Collaboration Meetings where community members shared their voices and ideas. This was done through facilitated group activities and prioritization exercises, such as voting on key actions that would help achieve the collective goals of Allentown Vision 2030. There were four total Community Collaboration Meetings. All meeting materials, as well as presentations and facilitated activities, were available in English and Spanish. Each Community Collaboration Meeting built on one another to guide the recommendations outlined in the plan.

Public meetings will be held in late in late March or early April at 10:00 am and 5:30 pm to review this document in its draft form and solicit feedback from the community. The hearings were held in City Council Chambers, City Hall, 435 Hamilton Street, Allentown, PA. A copy of the sign –in sheets and notices are included in the Citizen Participation Appendices.

A summary of the draft Action Plan was posted on the City's website on March 13 In addition, an advertisement was published in *The Morning Call* advising the public that the plan was available for review at the City's Department of Community and Economic Development, City Hall, 435 Hamilton Street, Allentown, PA.

5. Summary of public comments

A summary of public comments and consultation is included in the PR-10 Consultation and PR-15 Citizen Participation sections of this plan.

6. Summary of comments or views not accepted and the reasons for not accepting them

All of the comments or views were accepted by the City of Allentown.

7. Summary

The City of Allentown strived to prepare a 2020 -2024 Consolidated Plan that outlined the development of a viable urban community by providing decent housing, a suitable living environment, expanded economic opportunities principally for low and moderate-income persons, and programs that will address the needs of homeless and near homeless persons.

The City of Allentown's Citizen Participation outreach was designed to encourage broad participation from the City's residents, including non-English speaking persons. An approved Citizen Participation Plan was used to gather public comments through public meetings and the consultation process provided additional input. Information gathered from the public, and data provided by HUD was used to identify goals and the activities of this Consolidated Plan.

In addition, the City of Allentown coordinated the update of their Comprehensive Plan with the Consolidated Plan. This coordination provided additional opportunities for public engagement through surveys, public meetings and focus groups.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	ALLENTOWN	Community and Economic Development
HOPWA Administrator	ALLENTOWN	Pennsylvania Department of Health
HOME Administrator	ALLENTOWN	Community and Economic Development
ESG Administrator	ALLENTOWN	Community and Economic Development

Table 1 – Responsible Agencies

Narrative

The lead agency for the Consolidated Plan is the City of Allentown's Department of Community and Economic Development, which also administers the CDBG, HOME, and ESG programs. Other participating City agencies include the Bureau of Building Standards and Safety, the Bureau of Planning and Zoning and the Department of Public Works. In addition, the Allentown Housing Authority (AHA) will play a large role in providing and managing housing programs covered by this Plan. Coordination with various non-profit organizations, such as Community Action Committee of the Lehigh Valley, Lehigh Conference of Churches, Lehigh Valley Center for Independent Living, and the Salvation Army, will also be important.

The State of Pennsylvania serves as the administrator for the City's allocation of funds from the Housing for People with AIDS (HOPWA) program.

Consolidated Plan Public Contact Information

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

The City of Allentown has prepared a Five-Year Consolidated Plan for the Years 2020 through 2024 in order to strategically implement federal programs that fund housing, community development and economic development activities within the City. A series of Focus Groups were scheduled over two-day period in 2018 to solicit information from local social service agencies, housing providers, and community advocates. The Focus Groups were divided into four subject areas: Public Services, Housing, Homelessness and Youth.

In addition to Consolidated Planning-focused discussions and engagement, this Plan is also informed by the community workshops conducted in 2019 as part of its Allentown Vision 2030 comprehensive plan. The engagement component of the comprehensive plan included multiple Community Collaboration Meetings all over the City where residents and stakeholders could share their ideas about the future of Allentown.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

The City’s attempts to enhance coordination between housing providers and social service agencies by serving as a hub of communication. Annually, the City solicits feedback and information from these organizations and publishes it for review and comment. The City also invites housing providers and social service agencies to participate in focus groups and public meetings where these and other organizations are encouraged to provide input and feedback on the City’s entitlement community planning and evaluation activities.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

Since 2005, the City of Allentown has participated in the regional CoC process led by the Allentown/Northeast PA Regional Homeless Advisory Board (RHAB). The Eastern PA CoC Process is one of two regional efforts created to encompass non-entitlement portions of the state in order to receive homeless assistance from HUD. Within the region, the Lehigh Valley RHAB encompasses Lehigh and Northampton Counties, the cities of Allentown, Bethlehem and Easton.

The Eastern Pennsylvania CoC is currently an unincorporated organization that serves as the primary decision-making group for the CoC process. Its responsibilities include ensuring representation of key stakeholders; setting the agenda for full CoC planning meetings; conducting the annual homeless Point-in-Time count; overseeing the various subcommittees and working groups; completing the annual CoC application; and assisting in reviewing programs, activities, data, and all other efforts that will eliminate homelessness and improve the well-being of homeless persons and families in the northeast region. The City of Allentown actively participates with the CoC in their efforts to address the needs of homeless persons. In fact, the City of Allentown's HUD Grants Coordinator has served on the CoC Board for several years as co-chair and secretary.

In 2017, the Eastern Pennsylvania CoC adopted a Five-Year Strategic Plan (https://pennsylvaniacoc.org/wp-content/uploads/2017/12/EasternPACoC_StrategicPlan_Final.pdf) that included the following goals and outcomes for the five year period ending in 2021:

Goal: End chronic homelessness

Outcome: Achieve/maintain functional zero.

Goal: End Veterans homelessness

Outcome: Achieve/maintain functional zero

Goal: Reduce homelessness among families with children

Outcome: Achieve/maintain functional zero for unsheltered families with children

Outcome: Achieve/maintain functional zero for all families with children fleeing domestic violence

Outcome: Reduce all homelessness among families with children by 50% (households)

Goal: Reduce homelessness among unaccompanied youth **Outcome:** Reduce the number of unaccompanied youth experiencing homelessness by 75%

Goal: Set a path to end all forms of homelessness (achieve functional zero)

Goal: Reduce the duration of homelessness to an average of 47 days or less

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The City of Allentown relies on the Eastern Pennsylvania CoC for guidance in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS.

1. The City of Allentown aligns the use of ESG funds with the goals of the CoC's Five Year Strategic Plan.
2. The CoC formally adopted performance standards in April 2019 that included a goal to "evaluate systems-level outcomes and project-level outcomes of projects funded under the **Emergency Solutions Grant** and Continuum of Care programs."
3. All ESG-funded projects are setup in the HMIS system and are therefore evaluated by the CoC's Outcomes Committee.

In addition to these ongoing efforts, the CoC's Five Year Strategic Plan includes a goal of creating a subcommittee to expand and align resources. Specifically, the Plan calls for the CoC to: *"Establish an advisory group and/or steering committee to further align how ESG & CoC funding can be coordinated to support the implementation of this plan."* The Strategic Plan goes on to suggest the need to *"develop written standards for providing assistance that would direct the use of ESG & CoC resources."*

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	ALLENTOWN
	Agency/Group/Organization Type	Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Individuals from Allentown's Community and Economic Development Department Office of Housing & Federal Grants participated each of the four (4) Focus Group meetings held on November 7, 2018 and December 18, 2018 by offering insights and municipal perspective to conversations surrounding Housing, Homelessness, Public Services and Youth.
2	Agency/Group/Organization	ALLENTOWN RESCUE MISSION
	Agency/Group/Organization Type	Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Allentown Rescue Mission was an active participant in a Focus Group meeting held on November 7, 2018 dedicated to the topic of homelessness. They not only informed the Plan on the needs and priorities of the homeless population and the agencies that serve them, but also on the severe need for affordable housing options in the City. The organization is well-integrated in the community and actively involved in the CDBG/HOME planning process. Therefore, no areas for improved coordination were identified.
3	Agency/Group/Organization	LEHIGH VALLEY CENTER FOR INDEPENDENT LIVING (LVCIL)
	Agency/Group/Organization Type	Services - Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Lehigh Valley Center of Independent Living was an active participant in a Focus Group meeting held on November 7, 2018 dedicated to the topic of Public Services. Their input at the meeting focused on the need for more ADA-accessible rental units in the City and the difficulty their clients face in having landlords make ADA improvements. The organization is well-integrated in the community and an actively involved in the CDBG/HOME planning process. Therefore, no areas for improved coordination were identified.
4	Agency/Group/Organization	COMMUNITY ACTION COMMITTEE OF THE LEHIGH VALLEY
	Agency/Group/Organization Type	Anti-Poverty advocacy
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Sixth Street Shelter was an active participant in the Focus Group meeting held on November 7, 2018 on the topic of homelessness. As a provider of emergency housing, the organization's assessment of the services and housing needs of homeless families was invaluable. The organization is well-integrated in the community and an actively involved in the CDBG/HOME planning process. Therefore, no areas for improved coordination were identified.
5	Agency/Group/Organization	The Salvation Army
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homelessness Prevention
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Salvation Army participated in two (2) Focus Group meetings on November 7, 2018 on the topics of public services and homelessness. The organization provided valuable insights on the public service and homeless prevention needs of families in the community. The organization is well-integrated in the community and an actively involved in the CDBG/HOME planning process. Therefore, no areas for improved coordination were identified.
6	Agency/Group/Organization	HOUSING ASSOCIATION AND DEVELOPMENT CORPORATION
	Agency/Group/Organization Type	Housing Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Housing Association & Development Corporation actively participated in two (2) Focus Group meetings on November 7, 2018 dedicated to the topic of public services and housing. The organization helped informed the Focus Groups on the severe need of affordable housing units in the City and the generally poor quality of the rental housing inventory. The organization is well-integrated in the community and an actively involved in the CDBG/HOME planning process. Therefore, no areas for improved coordination were identified.
7	Agency/Group/Organization	COMMUNITY ACTION DEVELOPMENT CORPORATION OF ALLENTOWN
	Agency/Group/Organization Type	Services - Housing Services-Employment Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Community Action Development Corporation of Allentown participated in a Focus Group meeting on November 7, 2018 on the topic of public services. Their insights into small business development were helpful in identify the need for more marketing about the availability of training programs and the need for additional resources to help residents start new businesses. The organization is well-integrated in the community and an actively involved in the CDBG/HOME planning process. Therefore, no areas for improved coordination were identified.
8	Agency/Group/Organization	COMMUNITY BIKE WORKS
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Youth Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Community Bike Works participated in a Focus Group meeting on November 7, 2018. In addition, they hosted a Focus Group meeting at their office on December 18, 2018 dedicated to the needs of youth. In addition to staff's input on these topics, the organizations, eight youth from the program participated in the focus group and provided valuable input to the planning process. The organization is well-integrated in the community and an actively involved in the CDBG/HOME planning process. Therefore, no areas for improved coordination were identified.
9	Agency/Group/Organization	BOYS AND GIRLS CLUB OF ALLENTOWN
	Agency/Group/Organization Type	Services-Children Services-Education Services-Recreation
	What section of the Plan was addressed by Consultation?	Youth Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Boys and Girls Club of Allentown participated in a Focus Group meeting on November 7, 2018 on the topic of public services. Their input into the discussion about gaps of public services and overall needs of the community was helpful to the planning process. The organization is well-integrated in the community and an actively involved in the CDBG/HOME planning process. Therefore, no areas for improved coordination were identified.
10	Agency/Group/Organization	Valley Youth House Committee, Inc
	Agency/Group/Organization Type	Services - Housing Services-Children Services-homeless Services-Health Services-Education
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homelessness Needs - Unaccompanied youth

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Valley Youth House actively participated in a Focus Group meeting on November 7, 2018 on the topic of public services. The organizations contributions to the discussion included the need for affordable rental units, mental health, drug and alcohol services, and job training services. The organization is well-integrated in the community and an actively involved in the CDBG/HOME planning process. Therefore, no areas for improved coordination were identified.
11	Agency/Group/Organization	Allentown YMCA
	Agency/Group/Organization Type	Services-Children Services-homeless Services-Health Services-Education Healthy lifestyle advocacy and programming
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Economic Development Community Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Allentown YMCA actively participated in two (2) Focus Group meetings on November 7, 2018 on the topics of public services and homelessness. They made significant contributions to both discussions. The organization is well-integrated in the community and an actively involved in the CDBG/HOME planning process. Therefore, no areas for improved coordination were identified.
12	Agency/Group/Organization	Lehigh Conference of Churches
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with HIV/AIDS Services-homeless Services-Health Services-Nutrition

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Lehigh Conference of Churches actively participated in a Focus Group meeting on November 7, 2018 on the topic of public services. They made significant contributions to conversations surrounding the need for more affordable housing, mental health services and homeless prevention dollars. The organization is well-integrated in the community and an actively involved in the CDBG/HOME planning process. Therefore, no areas for improved coordination were identified.
13	Agency/Group/Organization	Youth Education in the Arts
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Youth Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Youth Education in the Arts participated in a Focus Group meeting held on November 7, 2018 on the topic of public services. The organization provided insights into affordable housing needs as well as the prevalence of gang activity in Center City. The organization is well-integrated in the community and an actively involved in the CDBG/HOME planning process. Therefore, no areas for improved coordination were identified.
14	Agency/Group/Organization	GRACE MONTESSORI SCHOOL
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Grace Montessori School attended a Focus Group meeting on November 7, 2018 on the topic of public services. The organization used the opportunity to express their desire to see more affordable housing in the community. The organization is well-integrated in the community and an actively involved in the CDBG/HOME planning process. Therefore, no areas for improved coordination were identified.
15	Agency/Group/Organization	Neighborhood Housing Services of the Lehigh Valley, Inc.
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Neighborhood Housing Services of the Lehigh Valley participated in a Focus Group meeting on November 7, 2018 on the topic of public services. The organization described a higher demand for homeownership in the City but a lack of homes that don't require repairs and renovation. The organization is well-integrated in the community and an actively involved in the CDBG/HOME planning process. Therefore, no areas for improved coordination were identified.
16	Agency/Group/Organization	North Penn Legal Services
	Agency/Group/Organization Type	Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	North Penn Legal services actively participated in a Focus Group meeting on November 7, 2018 on the topic of public services. The organization discussed the benefits of having a single magistrate handle all landlord-tenant cases and how support is needed for that proposal. The organization is well-integrated in the community and an actively involved in the CDBG/HOME planning process. Therefore, no areas for improved coordination were identified.
17	Agency/Group/Organization	Habitat for Humanity of the Lehigh Valley
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Habitat for Humanity of the Lehigh Valley participated in a Focus Group meeting on November 7, 2018 on the topic of housing. Habitat discussed the need for affordable, high quality housing throughout the City as well as a need for post-ownership counseling on budgeting and resources. The organization is well-integrated in the community and an actively involved in the CDBG/HOME planning process. Therefore, no areas for improved coordination were identified.
18	Agency/Group/Organization	Allentown Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Allentown Housing Authority actively participated in a Focus Group meeting held on November 7, 2018 on the topic of housing. The Housing Authority made significant contributions to discussions on the availability and quality of rental housing in Allentown as well as the lack of affordable housing near job opportunities. The organization is well-integrated in the community and an actively involved in the CDBG/HOME planning process. Therefore, no areas for improved coordination were identified.
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Identify any Agency Types not consulted and provide rationale for not consulting

The City's Citizen Participation Process was designed to be open and encouraging to all Agency Types. There were no Agency Types that were not consulted during the Consolidated Planning process

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Leghigh Valley RHAB CoC	The goals of the Strategic Plan are closely coordinated with the goals of the Continuum of Care. The Department of Community Development is an active participant with the applicant and administering agency for the Continuum of Care.
PHA 5 Year Plan	Allentown Housing Authority	The Goals of the Housing Authority's Five Year Plan are closely coordinated with the goals of providing affordable housing for the City
Regional Analysis of Impediments	City of Allentown	Department of Community Development staff preparing the Consolidated Plan were actively involved in the development and update of the Region's AI. Actions to address impediments identified in the AI are incorporated in the Action Plan and CAPERs
Safe and Healthy Neighborhoods	Center City Initiative	Department of Community Development staff preparing the Consolidated Plan were actively involved in the development and update of the Center City Initiative Report

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

Within Allentown: The institutional structure for providing affordable housing and community development improvements in Allentown involves several main agencies: the Allentown Housing Authority, the Redevelopment Authority of the City of Allentown, and the City.

Within PA: The coordination and provision of affordable housing is represented by three essential State agencies: the Pennsylvania Housing Finance Agency and the Pennsylvania Department of Community and Economic Development. The Department of Community and Economic Development provide funds through Federal and State programs. The Housing Finance Agency provides below-market interest rate mortgage financing and the allocation of low-income rental housing tax credit financing.

Lehigh County - The City of Allentown works closely with Lehigh County's Department of Community and Economic Development (DCED) to coordinate services and projects funded by both agencies. The DCEO focuses on enhancing the quality of life in all the County's communities by concentrating on the revitalization of our cities and boroughs, spurring economic growth, and supporting regional partnerships among our municipalities.

The Federal Government: The U.S. Department of Housing & Urban Development (HUD) provides entitlement grant funds through the Community Development Block Grant (CDBG), HOME Investment Partnership, and Emergency Solutions Grant (ESG) Programs. Discretionary funds may be secured through the HOPE VI, Section 8 Moderate Rehabilitation, and McKinney-Vento Programs, among others.

PRIVATE NONPROFIT ORGANIZATIONS: An important part of the institutional structure for affordable housing development in Allentown is represented by private nonprofit organizations. The city's nonprofit development organizations can be labeled as "specialized" organizations because they focus on fulfilling a small role in the larger picture of delivering affordable housing in a region with great need. These organizations are established either geographically or programmatically.

Most of the city's nonprofit organizations limit their efforts to a small geographic area, such as a block or two within a neighborhood for maximum impact. The focus tends to be on a particular type of housing (e.g. new units for small families) or on meeting a particular need (e.g. rehabilitation of existing units for very LMI households).

Narrative (optional):

No additional narrative was necessary to address this section of the Consolidated Plan.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The goals and strategies for the FY 2020-2024 Five Year Consolidated Plan and the 2020 Annual Action Plan were developed in conjunction with a coordinated public and stakeholder outreach process. Citizen participation was encouraged through participation in the public hearings and review of the Plan during the display period. Citizens were made aware of the process and opportunity to comment on the plan through newspaper advertisements, public hearings, surveys, and focus group meetings.

In early 2019, the City of Allentown embarked on a year-long planning exercise to create a new Comprehensive Plan. The Plan, entitled Allentown Vision: 2030 began with a robust community engagement component that resulted in thousands of residents and stakeholders participating in events held all over the City. For those that couldn't attend a community meeting, the City established the Community Engagement Hub in a storefront location in the downtown where the results of all prior meetings are on public display. The community engagement phase of the Comprehensive Plan concluded in August 2019. The feedback and comments collected have all be accepted and otherwise included in this Consolidated Plan.

In addition, the City held four (4) Focus Group meetings on the topics of homelessness, affordable housing, youth and public services. Dozens of local agencies participated in the Focus Group meetings which were held on November 7 and December 18, 2018.

On November 13, 2019, a public hearing was held at the Eastside Youth Center at 1140 E Clair Street, Allentown at 6:00PM. An additional public hearing was held on October __, 2019 during the display period of this Consolidated Plan and Annual Action Plan. The public hearing was held in City Council Chambers, City Hall, 435 Hamilton Street, Allentown.

A summary of the draft Consolidated Plan and Annual Action Plan was posted on the City's website on March 14, 2020. In addition, an advertisement was published in *The Morning Call* (on March 14th) advising the public that the plan was available for review at the City's Department of Community and Economic Development, City Hall, 435 Hamilton Street, Allentown, PA.

The City has an open-ended policy of allowing for citizen input because its Consolidated Plan is contingent on citizen input. This input process also includes meetings with local community groups, particularly those which represent minority and disabled persons, such as Lehigh County Conference of Churches and the Lehigh Valley Center for Independent Living. The City also works with Allentown Housing Authority, as well as private housing advocacy groups, to encourage the participation of the public housing residents.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Meeting	Non-targeted/broad community	The City conducted four (4) focus group meetings over two days to solicit input and set priorities for this Consolidated Plan. The meetings were held on November 7, 2018 and December 18, 2018. Representatives of dozens of local organizations attended the meetings.	A summary of the comments received are included in the Citizen Participation Appendices.	All comments were accepted	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	Non-targeted/broad community Youth	A public hearing was held on November 13, 2018 to solicit input from the general public and City youth. The meeting was held in a nontraditional location (Eastside Youth Center) in an effort to reach individuals that would not normally attend a meeting held at City Hall.	A summary of the comments received from the public hearing at the Eastside Youth Center can be found in the Citizen Participation Appendices.	All comments were received.	
3	Public Hearing	Non-targeted/broad community	The City held an additional public hearing on October __, 2019.			

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

During the five-year period covered by the 2020-2024 Consolidated Plan, the City of Allentown will undertake the following activities to address its various housing and community development needs:

Housing Needs:

Maintenance and improvement of housing stock – aggressive enforcement of existing overcrowding;

Make available affordable homeownership within the existing housing stock;

Acquisition of vacant properties for use in homeownership and affordable rental programs;

Allocation of acquired properties to appropriate nonprofits;

Assistance to moderate-income households in obtaining funds necessary for down payments and closing costs;

Development of new programs to encourage potential homeowners to buy properties;

Increase the knowledge and skills necessary for residents to own and maintain their own home through the Home Ownership Counseling Program;

Support the provision of decent, safe, and affordable rental housing with the City and on a regional basis;

Participate in regional efforts to make available a full array of permanent housing opportunities for special needs populations; and

Contribute to meeting the shelter and service needs of homeless residents of the City.

Community and Economic Development Needs:

Economic and Job Creation

Increase employment opportunities in the City, with special attention to strengthening the commercial/industrial base

Facilitate the adaptation and reuse of existing vacant and under-utilized land and buildings

Increase the educational preparedness and level of skills necessary for entrance employment opportunities for residents in the

Create a lending program to facilitate economic development projects

Community/Recreational/Educational Programming and Facilities

Enhance the utilization of existing public/quasi-public facilities for neighborhood activities

Properly maintain and improve the condition of publicly-owned facilities

Increase the number of and access to recreational/educational program opportunities

Infrastructure

Infrastructure improvements that will promote commercial/industrial development

Infrastructure improvements in residential neighborhoods that encourage multimodal transportation options and offer residents the ability to choose

Ensure that industrial properties slated for redevelopment/rehabilitation into other uses have the necessary utilities to support those uses

Livability

Increase cleanliness and sense of well-being in the City's neighborhoods

Support existing neighborhood groups and promote the development of new community organizations throughout the City

Promote the architectural and cultural resources that exist in many City neighborhoods

Public Safety

Create safe and secure residential neighborhoods and commercial districts

Enforce existing safety codes for areas in public rights-of-way and in residential neighborhoods

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The following narrative describes Allentown's demographic characteristics and its estimated housing needs for the next five years covered by the Consolidated Plan. Allentown is the third most populous city in the state of Pennsylvania (behind Philadelphia and Pittsburgh), and the most populous city in Lehigh County, with a population of 120,128 according to the 2013-2017 American Community Survey. The city occupies 18.0 square miles, including 17.8 square miles of land (98.9%) and 0.2 square miles of water (1.1%). The Lehigh River connects Allentown to the other two cities within the metropolitan statistical area, Bethlehem and Easton, to the east.

Unlike Lehigh County and Pennsylvania, Allentown's rate of growth has been inconsistent over the past several decades; but in line with the County and State, it has seen its overall population increase since 1980. Allentown's population decreased significantly between 1970 and 1980, dropping 5.3%, or 5,763 persons, and then grew by 2.8% between 1980 and 2000, from 103,758 to 106,632 persons. From 1970 to 2000, Allentown's population shrank by 2,889 persons, or 2.6%. By comparison, Lehigh County grew by 22.2% and Pennsylvania grew by 4.1% over the same time 30-year time period. From 2000 to 2017 Allentown's population has grown by 13,496 persons or 12.6%. During the same period, Lehigh County grew at a slightly higher rate than the City at 15.6%, and both city and county grew at rates higher than Pennsylvania, which grew by 4.1%.

According to City's records, Allentown has a total of 47,210 housing units with 57.1 percent being single family structures and 42.8 percent being multi-family structures. The 2013-2017 American Survey indicates that 8.4 percent of housing units were vacant. The ACS goes on to estimated 10.9 percent of the housing units were built since 1990.

Of the 45,384 occupied housing units, 18,195 (40.1 percent) are owner occupied and 27,189 (59.9 percent) are renter occupied. An estimated 79.2 percent of householders of these units had moved in since 2000. An estimated 65.5 percent of the owner-occupied units had a mortgage.

According to the 2013-2017 American Community Survey 5-Year Estimates, the median monthly housing costs for mortgaged owners was \$1,257, non-mortgaged owners \$534, and renters \$938. An estimated 35.7 percent of owners with mortgages, 22.6 percent of owners without mortgages, and 60.1 percent of renters in Allentown, Pennsylvania spent 30 percent or more of household income on housing.

The following Demographics from the 2012-2016 CHAS indicate that renters in Allentown whose household incomes are 0-30% of the AMI have the highest rates and greatest chance amongst renters of having at least 1 or more of the four housing problems (lacking kitchen or complete plumbing, overcrowding and cost burden). Owner households whose household incomes are 30-50% of the AMI have the highest rates and greatest chance amongst owners of having at least 1 or more of the four housing problems.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	118,032	119,260	1%
Households	39,941	41,245	3%
Median Income	\$36,454.00	\$36,930.00	1%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	9,470	7,755	8,175	4,335	11,505
Small Family Households	3,595	3,220	3,285	1,820	5,775
Large Family Households	1,050	1,055	1,140	435	960
Household contains at least one person 62-74 years of age	1,435	1,135	1,335	735	2,255
Household contains at least one person age 75 or older	1,000	1,325	1,115	340	975
Households with one or more children 6 years old or younger	2,300	1,845	1,660	845	1,140

Table 6 - Total Households Table

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	125	40	4	0	169	30	0	45	0	75
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	65	25	45	15	150	10	25	30	0	65
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	500	225	60	140	925	80	10	35	45	170
Housing cost burden greater than 50% of income (and none of the above problems)	5,035	1,370	105	4	6,514	940	795	385	120	2,240
Housing cost burden greater than 30% of income (and none of the above problems)	795	2,875	1,440	265	5,375	280	835	1,465	390	2,970
Zero/negative Income (and none of the above problems)	520	0	0	0	520	50	0	0	0	50

Table 7 – Housing Problems Table

Data 2011-2015 CHAS

Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	5,725	1,660	215	160	7,760	1,060	825	490	165	2,540
Having none of four housing problems	1,710	3,570	3,725	1,805	10,810	405	1,700	3,740	2,210	8,055

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Household has negative income, but none of the other housing problems	520	0	0	0	520	50	0	0	0	50

Table 8 – Housing Problems 2

Data 2011-2015 CHAS

Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,660	2,215	549	5,424	455	665	965	2,085
Large Related	845	795	130	1,770	150	165	225	540
Elderly	1,040	595	215	1,850	535	545	370	1,450
Other	1,875	890	660	3,425	180	290	320	790
Total need by income	6,420	4,495	1,554	12,469	1,320	1,665	1,880	4,865

Table 9 – Cost Burden > 30%

Data 2011-2015 CHAS

Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,495	630	4	3,129	400	370	165	935
Large Related	810	135	0	945	135	55	30	220
Elderly	725	245	75	1,045	350	180	145	675
Other	1,570	365	25	1,960	155	195	45	395
Total need by income	5,600	1,375	104	7,079	1,040	800	385	2,225

Table 10 – Cost Burden > 50%

Data 2011-2015 CHAS

Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	455	185	85	95	820	19	35	19	45	118
Multiple, unrelated family households	94	50	20	45	209	65	0	35	0	100
Other, non-family households	15	10	0	15	40	4	0	0	0	4
Total need by income	564	245	105	155	1,069	88	35	54	45	222

Table 11 – Crowding Information – 1/2

Data Source: 2011-2015 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source:
Comments:

Data no longer collected by the ACS to populate this table.

Describe the number and type of single person households in need of housing assistance.

The most significant housing need among single person households in Allentown is the need for emergency and long-term housing for homeless individuals. The 2019 Lehigh Valley RHAB Point in Time Count found 56 unsheltered, homeless individuals are homeless and unsheltered in the County of Lehigh. While statistics for Allentown City are not available from the PIT, the vast majority of the County's homeless population are found within the City due to the concentration of public assistance and services. These individuals are in need of either emergency shelters or long-term supportive housing.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Estimated Housing Needs for Persons with Disabilities

Census data reports disability status for civilian, non-institutionalized persons aged five and over. The enumeration excludes institutionalized disabled persons, which consists of persons under formally authorized, supervised care or in custody in institutions. As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home or to work at a job or business.

According to the 2013-2017 American Community Survey, there were 18,633 non-institutionalized persons age eighteen years and older with a disability -- with females representing more than 60% of that population. A copy of the American Community Survey is included in the Grantee Unique Appendices. Due to the limited income of many disabled, it can be estimated that approximately 10,000 to 14,000 of the non-institutionalized adults are in need of housing assistance, either in the form of locating accessible units or with assistance in monthly rental or mortgage obligations. Accessible rental housing continues to be discussed among residents and stakeholders as an important housing need.

Of the subpopulations measured in the Point in Time Count each year (severely mentally ill, chronic substance abuse, persons with HIV/AIDS, persons with disabilities, veterans, and victims of domestic violence), the disabled remain the most prevalent subpopulation. In 2019, 56% of those that identified with a subpopulation, identified themselves as disabled.

Estimated Housing Needs for Victims of Domestic Violence

Turning Point of Lehigh Valley is Lehigh Valley's oldest and largest domestic violence intervention and prevention provider. For more than 40 years, Turning Point has operated as a community safety net, particularly during times of economic hardship. Turning Point provides a number of services, including empowerment counseling, support groups, safe house shelter, and legal advocacy. In addition, the organization works with high schools and colleges, the medical community, religious groups, and law enforcement to spread awareness of domestic violence and develop solutions.

The organization operates two emergency shelters in the Lehigh Valley, one of which is in Lehigh County. In total, Turning Point has 32 total bedrooms available for victims of domestic violence and their families. These facilities provide communal living arrangements with shared bathrooms, kitchens, and housekeeping duties. The lack of affordable housing has dramatically affected Turning Point's ability to place its client families into mainstream housing. Five years ago, the average stay in shelter was sixteen (16) days. In 2018, the average stay grew to forty (40) days. The struggle to find housing for its clients has forced Turning Point to use hotels to meet the needs of new victims of domestic violence. Turning Point is on track in 2019 to realize a 500% increase hotel-based emergency housing expenses over the previous year.

Domestic violence continues to be factor among the homeless population. During the 2019 Point in Time Count, 38 individuals identified as being victims of domestic violence, a slight increase over the 2018 figure of 27. In 2017, 89 individuals reporting being victims of domestic violence.

The City of Allentown does not currently have statistics or means to measure the need for housing assistance among victims of dating violence, sexual assault or stalking.

What are the most common housing problems?

The most common housing problems in the City of Allentown are:

- A lack of affordable housing options and long waiting lists for income-restricted units;
- A high rate of households spending more than 30% of their gross household income on housing expenses;
- Landlords discrimination, including discrimination against households with children and tenant-based housing voucher holders; and
- Lack of ADA accessible rental housing.

Are any populations/household types more affected than others by these problems?

In examining the tables on Housing Problems, Cost Burdens, and Crowding, it is clear that renters earning less than 30% of the median and between 30% and 50% of the median are affected by these problems more than those of renters earning more than 50% of the median and owners on a consistent basis.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

The number of persons "at risk" of becoming homeless is difficult to estimate at any point in time. Those threatened with eviction, unemployment, foreclosure, or termination of utilities could become homeless when they no longer have a cushion against the perils of life. Most commonly, it is when a family lives paycheck to paycheck without any savings for emergencies. If only one lost paycheck, a small rent increase, a brief hospitalization, or a temporary layoff from work can cause people to lose their housing, then they are considered "at risk". A common scenario is when eviction from rental housing occurs due to nonpayment of rent. Unemployment or underemployment results in lack of sufficient income to meet the costs of food, housing, transportation, and childcare.

Additionally, individuals or families who fall into one or more of the following categories are most likely to become homeless:

- Persons leaving institutions such as mental hospitals or prisons;
- Young adults aging out of the foster care system;
- Households with incomes less than 30% of the median family income;
- Households paying in excess of 50% of income for housing costs;
- Victims of domestic violence;
- Special needs populations such as persons with disabilities, drug and/or alcohol addictions;
- Single parent households who are unemployed;
- Large low income families;
- Renters facing eviction;
- Homeowners facing foreclosure; and
- Families/persons seeking refuge from natural disasters (e.g., refugees from Puerto Rico).

The City and the Region's local non-profits and social service agencies continue to work with formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance in order to assist with identifying permanent affordable replacement housing for these families or temporary affordable housing until permanent housing can be identified. In most cases, the rapid re-housing placement is a permanent placement and provides stable housing and case management works to ensure the family can maintain that stable housing moving forward.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Not Applicable

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Housing characteristics that can be linked with instability and increased risk of homelessness are poor housing quality rental units and high energy expenses. Renters occupying units in disrepair often reach a level of frustration with their landlords that result in them either withholding rent as an attempt to incentivize the landlord to make repairs or moving out altogether. Both of these scenarios put the home at risk of homelessness. Landlords will likely start eviction proceedings against any tenant failing to pay rent, regardless of the need to make repairs. Without well-documented evidence about the need for repairs and proper notification to the landlord, tenants may not fair well in court. Those tenants that simply flee poor quality rental housing are unlikely to find housing stability quickly given their lack of a security deposit and the urgency of their needs.

With the majority of housing units construction before 1950, Allentown's housing stock is not energy efficient. Paired with a lack of overall investment and upkeep, energy expenses in Allentown's homes can be extremely high. An unexpectedly high energy bill in a household that is already cost burdened with their housing expenses can result in an increased risk of homelessness.

Discussion

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

A household experiencing one or more of the following conditions is considered to have a "Housing Problem:" 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost burden greater than 30%. The purpose of this section is to identify any racial or ethnic group with a disproportionately higher need than the entire category. Specifically, a disproportionate need exists if the racial or ethnic group is at least 10 percentage points higher than the percentage of persons in category as a whole.

0%-30% of Area Median Income

The jurisdiction as a whole in this income category is experiencing one or more of the four (4) housing problems at a rate of eighty eight percent (88%). The only group of individuals experiencing one or more housing problems at a disproportionately higher rate is Black/African American at a rate of 98%.

30%-50% of Area Median Income

The jurisdiction as a whole in this income category is experiencing one or more of the four (4) housing problems at a rate of seventy nine percent (79%). No group of individuals experiencing one or more housing problems at a disproportionately higher rate.

50%-80% of Area Median Income

The jurisdiction as a whole in this income category is experiencing one or more of the four (4) housing problems at a rate of forty four percent (44%). Several races categories are experiencing one or more housing problems at a disproportionately higher rate. Specifically, Black/African American (55%), Asian (71%), American Indian, and Alaska Native (66%).

80%-100% of Area Median Income

The jurisdiction as a whole in this income category is experiencing one or more of the four (4) housing problems at a rate of twenty two percent (22%). The only group of individuals experiencing one or more housing problems at a disproportionately higher rate is Asian at a rate of 44%.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,860	1,040	570

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	2,275	510	270
Black / African American	1,160	25	30
Asian	85	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	4,190	445	269

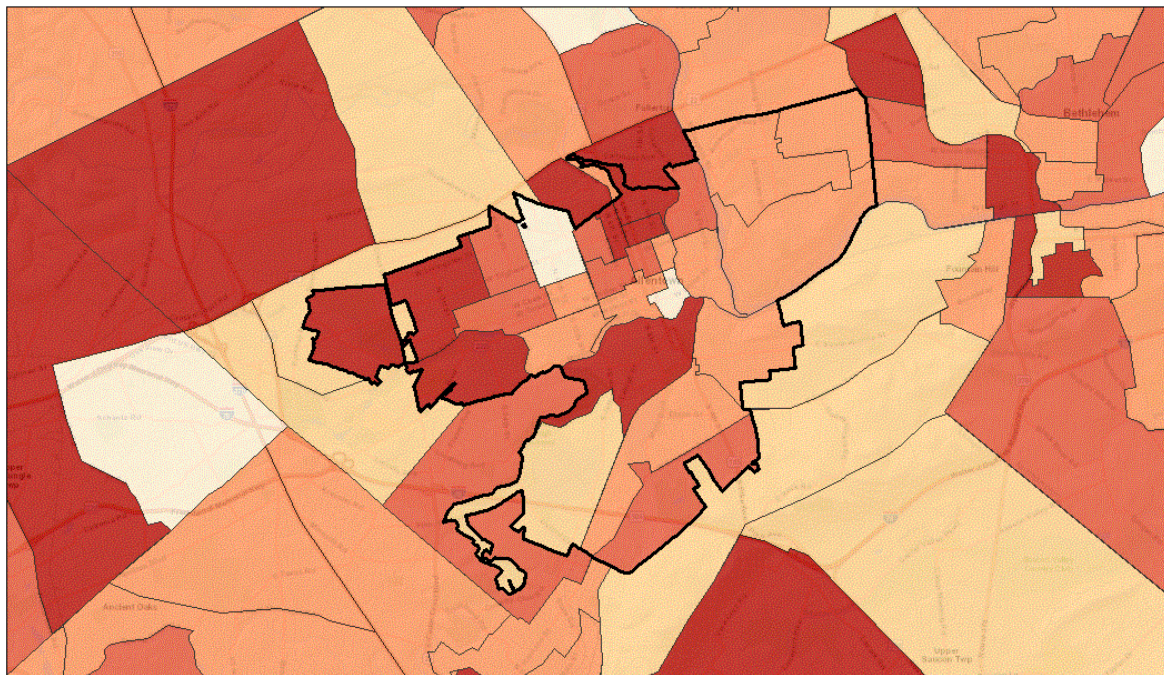
Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2011-2015 CHAS

Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

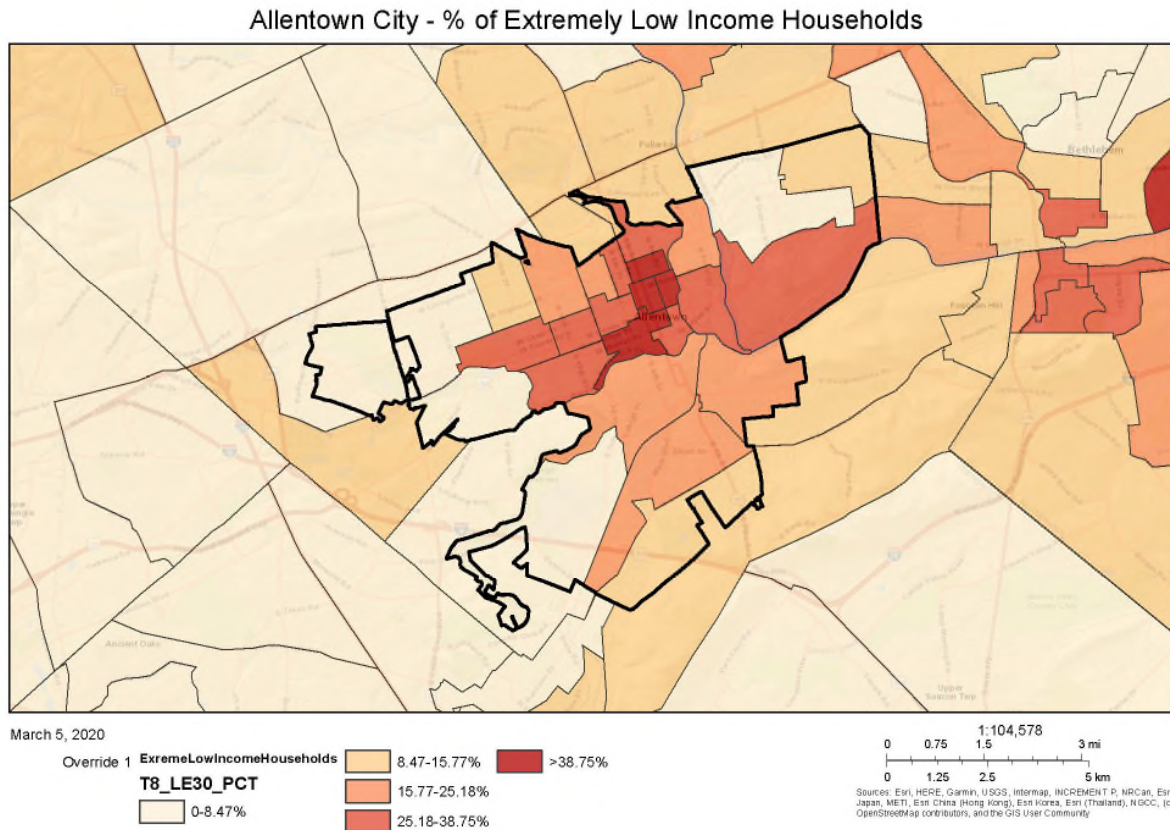
Allentown City - % of Extremely Low Income HHs - With Any of 4 Severe Housing Problems

March 5, 2020

Override 1 ELIHHWithHousingProblems
T2_LE30_HP2_PCT
 0-39.29% 39.29-57.46% 57.46-72.31% 72.31-86.84% >86.84%

1:104,578
 0 0.75 1.5 3 mi
 0 1.25 2.5 5 km
 Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Allentown City - % of Extremely Low Income HHs with Any of 4 Severe Housing Problems



Allentown City - % of Extremely Low-Income Households

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,195	1,565	0
White	2,315	1,010	0
Black / African American	635	130	0
Asian	100	20	0
American Indian, Alaska Native	0	35	0
Pacific Islander	0	0	0
Hispanic	2,880	370	0

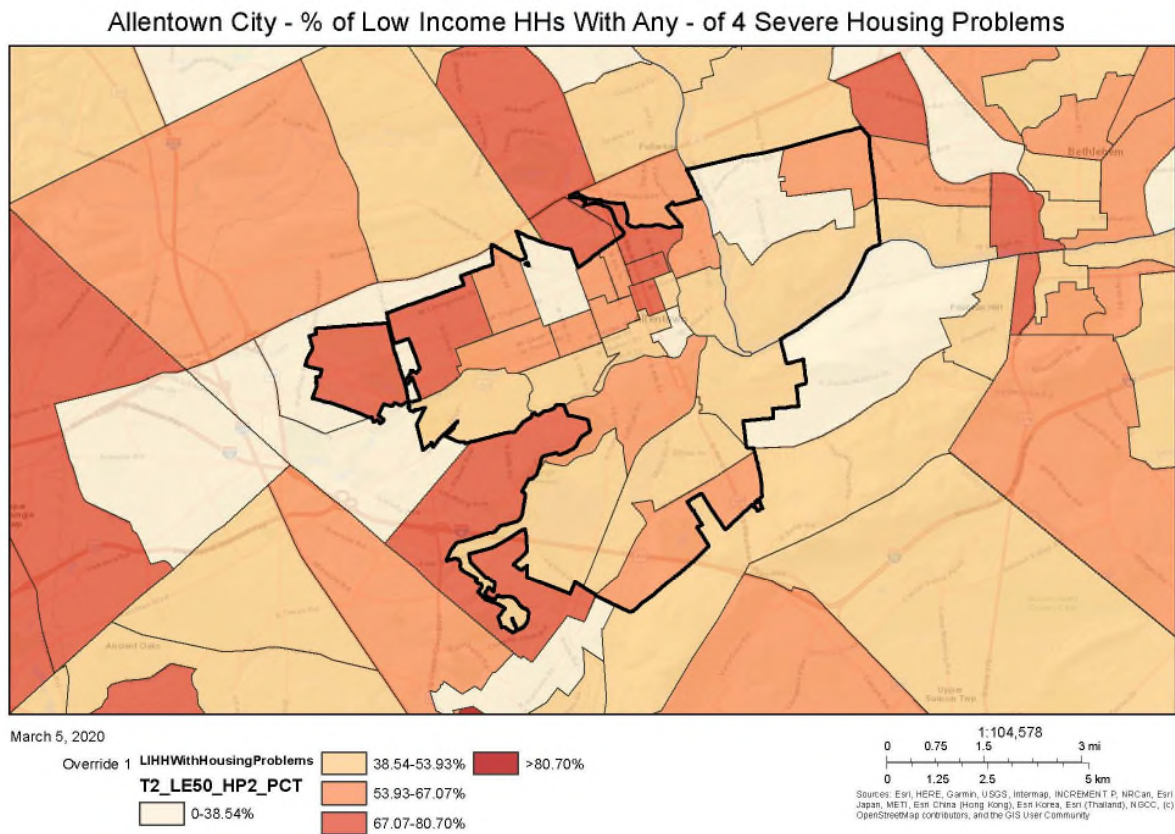
Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2011-2015 CHAS

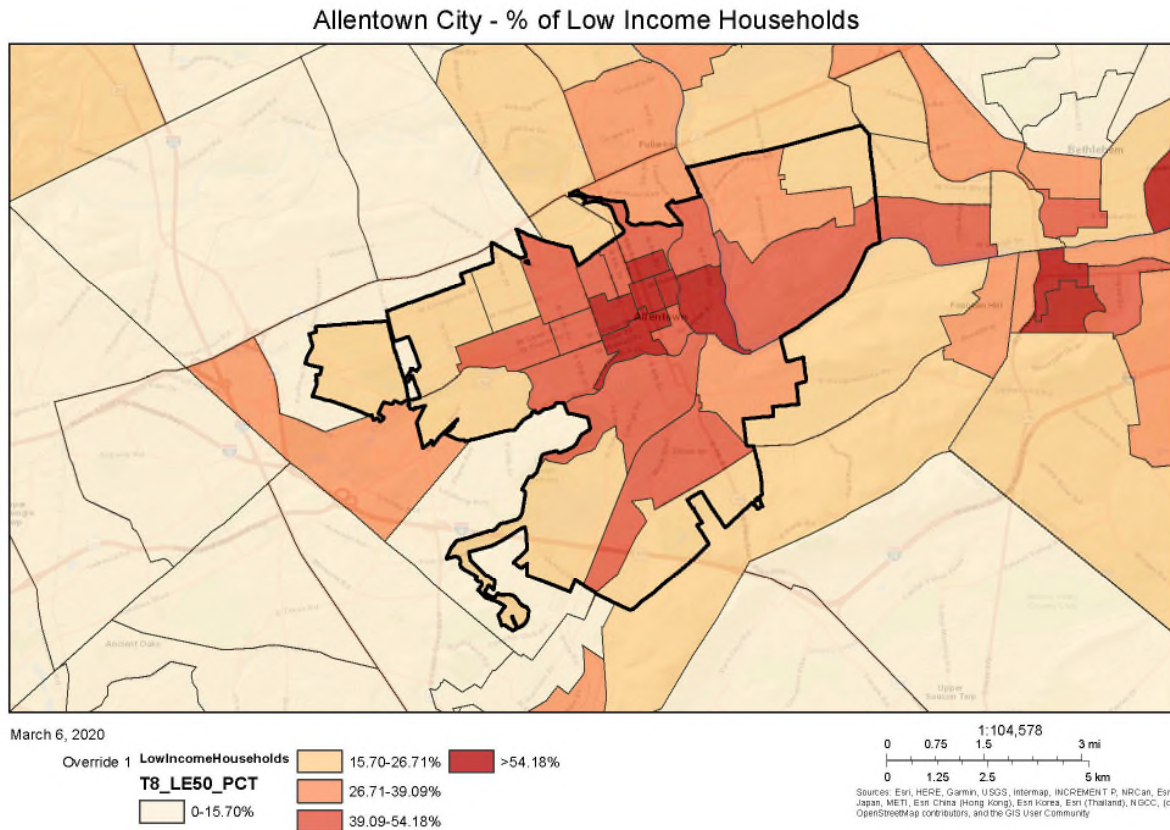
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%



Allentown City - % of Low Income HHs With Any of the 4 Housing Problems



Allentown City - % of Low-Income Households

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,615	4,560	0
White	1,675	2,530	0
Black / African American	430	340	0
Asian	110	45	0
American Indian, Alaska Native	30	15	0
Pacific Islander	0	0	0
Hispanic	1,355	1,605	0

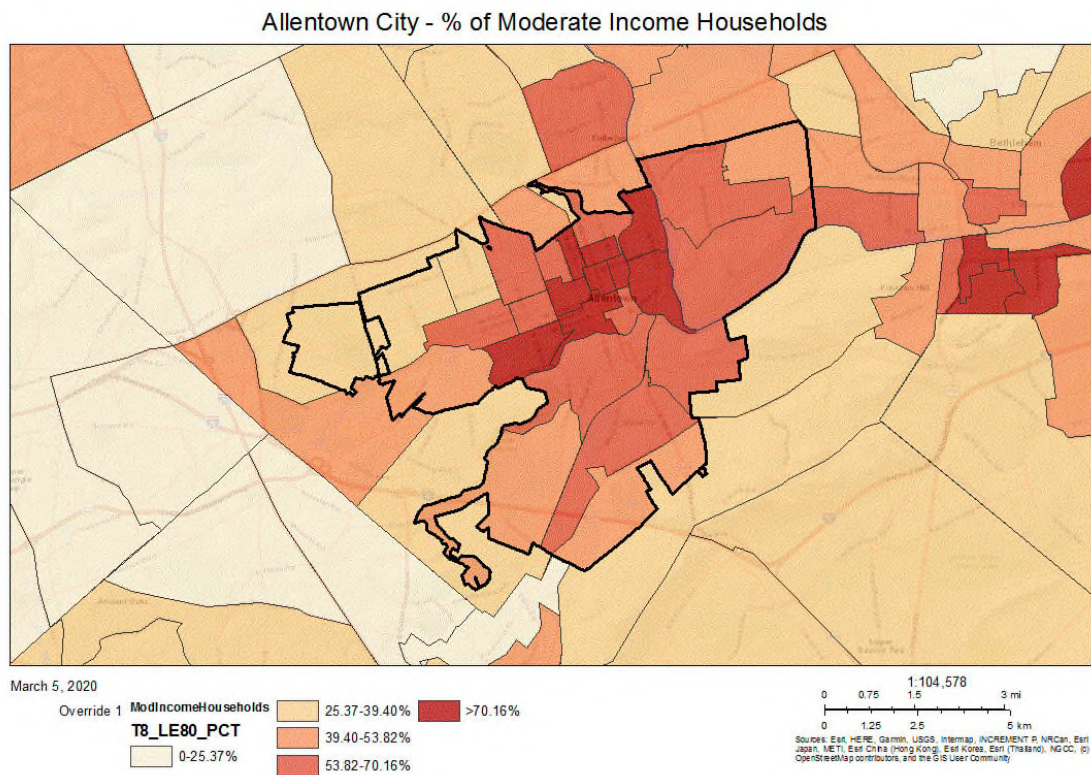
Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2011-2015 CHAS

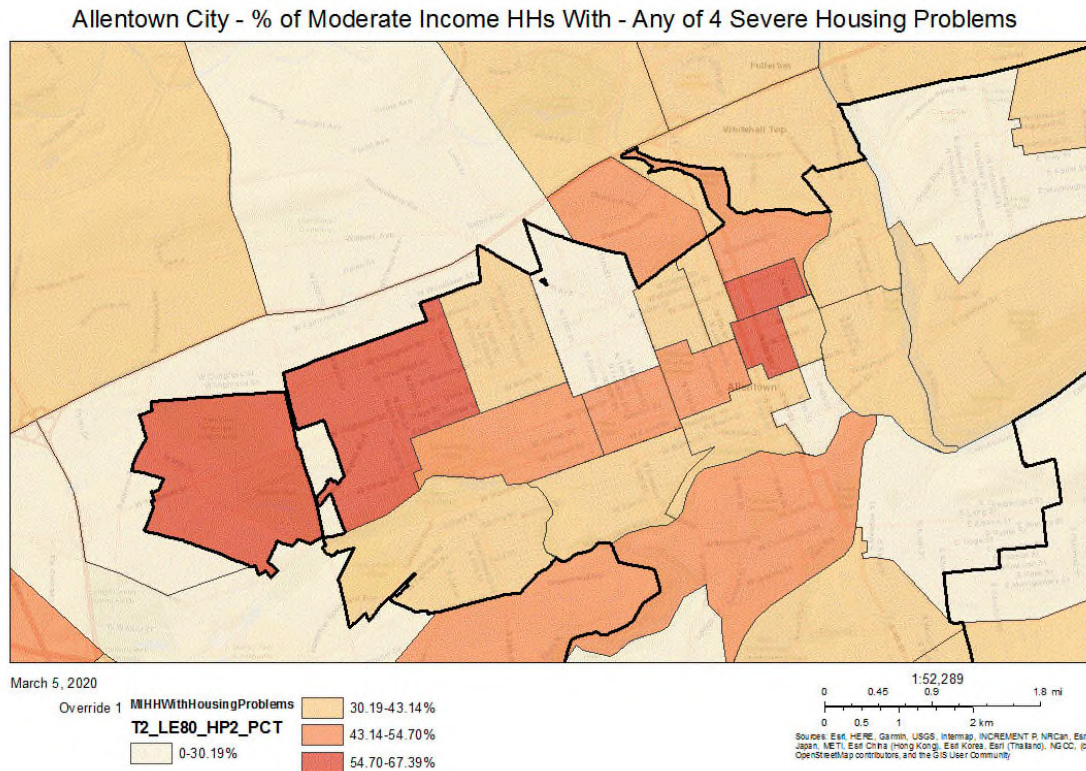
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%



Allentown City -- % of Moderate-Income Households



Allentown City -- % of Moderate-Income HHs With Any of 4 Severe Housing Problems

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	975	3,360	0
White	430	1,750	0
Black / African American	95	245	0
Asian	40	50	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	410	1,290	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Mapping for households with income between 80% and 100% of area median income is not available in the CPD Mapping Tool.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Severe Housing Problems are defined as a home with one or more of the following conditions: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost burden over 50%. The purpose of this section is to identify any racial or ethnic group with a disproportionately higher need than the entire category. Specifically, a disproportionate need exists if the racial or ethnic group is at least 10 percentage points higher than the percentage of persons in category as a whole.

0%-30% of Area Median Income

The jurisdiction as a whole is experiencing one or more of the four (4) severe housing problems at a rate of seventy six percent (76%). The only group of individuals experiencing one or more severe housing problems at a disproportionately higher rate is Black/African American at a rate of 86%.

30%-50% of Area Median Income

The jurisdiction as a whole is experiencing one or more of the four (4) severe housing problems at a rate of thirty two percent (32%). No racial or ethnic group is experiencing one or more severe housing problems at a disproportionately higher rate.

50%-80% of Area Median Income

The jurisdiction as a whole is experiencing one or more of the four (4) severe housing problems at a rate of eight percent (8%). No racial or ethnic group is experiencing one or more severe housing problems at a disproportionately higher rate.

80%-100% of Area Median Income

The jurisdiction as a whole is experiencing one or more of the four (4) severe housing problems at a rate of seven (7%). The only group of individuals experiencing one or more severe housing problems at a disproportionately higher rate is Black/African American at a rate of 17%.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,785	2,115	570

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	1,880	915	270
Black / African American	1,025	159	30
Asian	70	35	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	3,660	975	269

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,485	5,270	0
White	975	2,350	0
Black / African American	250	520	0
Asian	50	70	0
American Indian, Alaska Native	0	35	0
Pacific Islander	0	0	0
Hispanic	1,125	2,120	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	705	7,465	0
White	330	3,875	0
Black / African American	115	660	0
Asian	44	110	0
American Indian, Alaska Native	0	45	0
Pacific Islander	0	0	0
Hispanic	210	2,745	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2011-2015 CHAS

Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	325	4,015	0
White	125	2,060	0
Black / African American	60	285	0
Asian	14	75	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	120	1,575	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2011-2015 CHAS

Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

The CPD Mapping Tool does not maintain data on multiple severe housing problems.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

The purpose of this section is to identify those who experience **Housing Cost Burdens** at a disproportionately higher rate. A disproportionately higher rate when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in category as a whole.

In an effort to more fully describe the information in the chart below and to avoid any confusion with similarly-indexed income categories, the columns are defined as follows:

<=30% Housing Cost to Income Ratio Less than 30%. The number of households without a cost burden.

30-50% The number of cost-burdened households that pay between 30% and 50% of their income on housing-related costs.

>50% Housing Cost to Income Ratio Greater Than 50%. The number of severely cost-burdened households that pay more than 50% of their income on housing-related costs.

No/Negative Income (Not Computed). The number of households whose income is zero or negative due to self-employment, dividends, and net rental income. These households are not included in the other two categories. Households with zero or negative income cannot actually have a cost burden, but still require housing assistance and therefore are counted separately.

Housing Cost to Income Ratio Less than 30%

Approximately fifty two percent (52%) of all households in City have a housing cost to income ratio of less than 30% and are otherwise **not cost burdened**. The only group with a disproportionately lower rate of non-cost burdened households in this category are Hispanics with 41%.

Housing Cost to Income Ratio Between 30% and 50%

Approximately twenty three percent (23%) of all households in the City have a housing cost to income ratio of between 30% and 50% and are otherwise **cost burdened**. There are no racial or ethnic groups with a disproportionately higher rate of cost burdened households in this category.

Housing Cost to Income Ratio Greater Than 50%

Approximately twenty three percent (23%) of all households in the City have a housing cost to income ratio of more than 50% and are otherwise **severely cost burdened**. There are no racial or ethnic groups with a disproportionately higher rate of cost burdened households in this category. It is worth noting the Black/African American population (32% extremely cost burdened) is just 1 percentage point from meeting the definition for a disproportionate difference.

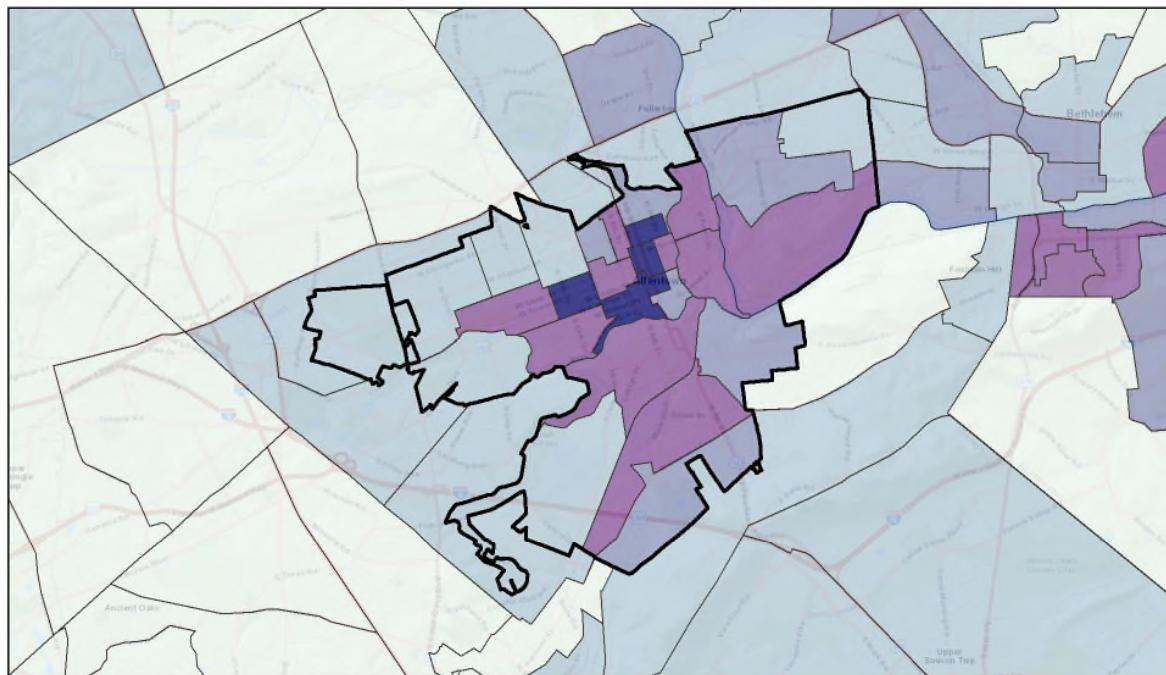
Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	21,595	9,540	9,485	620
White	12,760	4,070	3,160	285
Black / African American	1,840	940	1,310	40
Asian	450	160	160	0
American Indian, Alaska Native	80	30	0	0
Pacific Islander	0	0	0	0
Hispanic	6,280	4,110	4,620	290

Table 21 – Greater Need: Housing Cost Burdens AMI

Data 2011-2015 CHAS
Source:

Allentown City - All Households with Housing Cost Burden



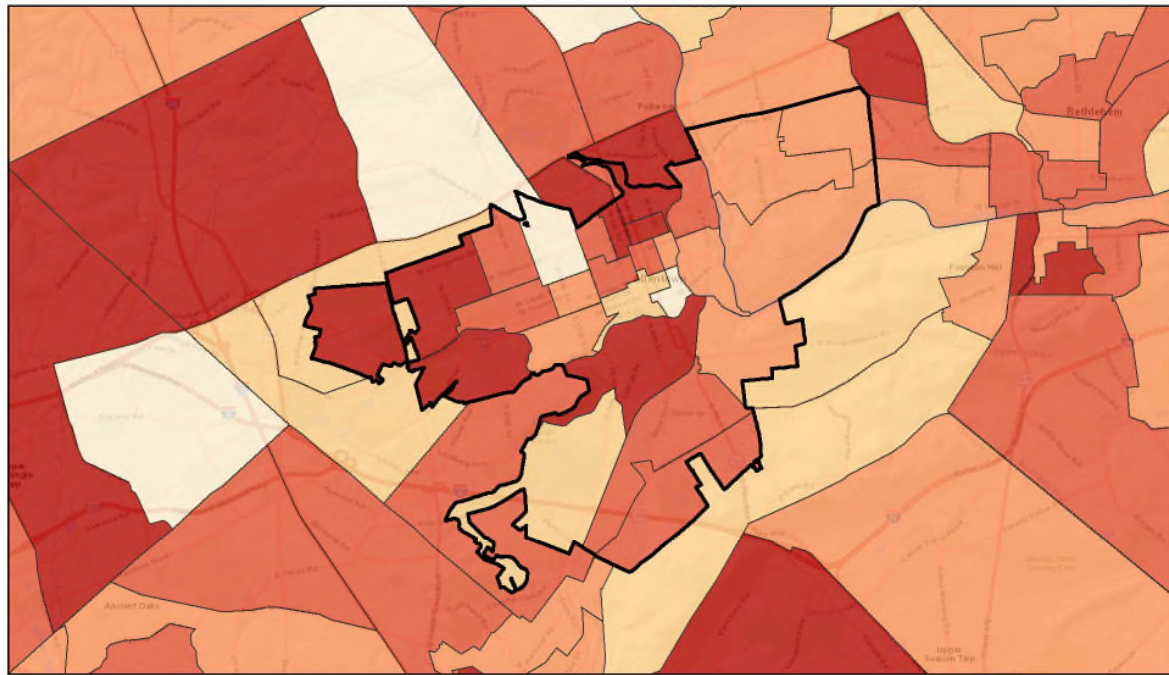
March 6, 2020

Override 1 HousingCostBurden
 B25106_CB_PCT
 0-29.28% Paying>30%
 29.28-38.78% Paying>30%
 38.78-47.69% Paying>30%
 47.69-58.44% Paying>30%
 >58.44% Paying>30%

0 0.75 1.5 3 mi
 0 1.25 2.5 5 km
 1:104,578
 Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NAGC, (c) OpenStreetMap contributors, and the GIS User Community

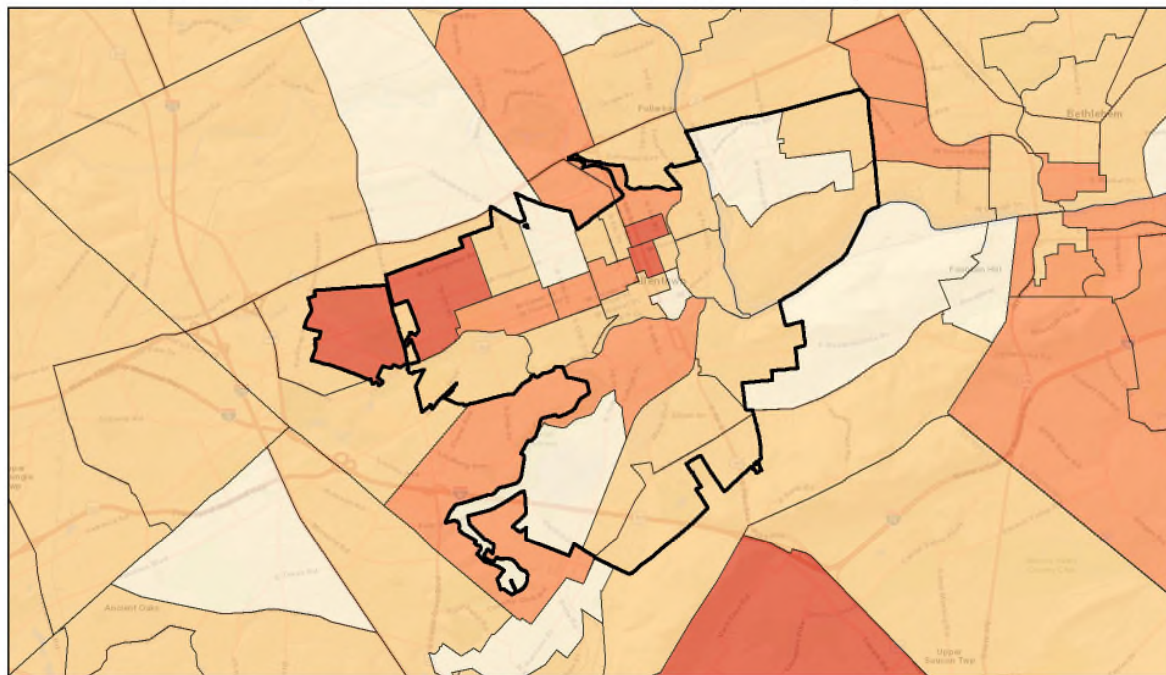
All Households with Housing Cost Burden

Allentown City - Extremely Low Income HHs with Severe Housing Cost Burden



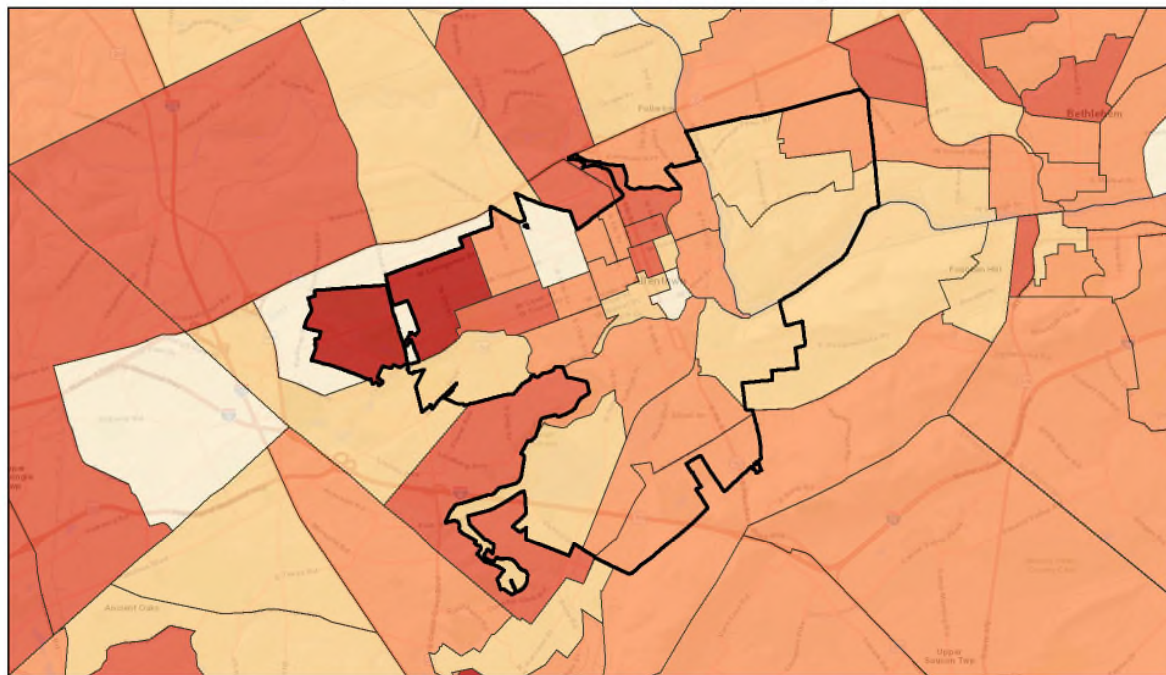
Extremely Low Income HHs with SEVERE Housing Cost Burden

Allentown City - Moderate Income HHs with Severe Housing Cost Burden



Moderate Income HHs with SEVERE Housing Cost Burden

Allentown City - Low Income HHs with Severe Housing Cost Burden



Low-Income Households with SEVERE Housing Cost Burden

Discussion:

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The following summarizes those instances where racial and ethnic classes are experiencing a disproportionate difference:

Black/African American households in the Extremely Low-Income category had a 10% greater likelihood of having one or more **housing problems**.

Black/African American households in the Moderate-Income category had an 11% greater likelihood of experiencing one or more **housing problems**.

Asian households in the Moderate-Income category had an 26% greater likelihood to experience one or more **housing problems**.

American Indian/Alaskan Natives in the Moderate-Income category had a 22% greater likelihood to experience one or more **housing problems**.

Black/African American households in the Extremely Low-Income category had a 10% greater likelihood of having one or more **severe housing problems**.

Black/African American households in the Above Income category (above 80% of AMI) had a 10% greater likelihood of having one or more **severe housing problems**.

Hispanics have a disproportionately lower rate of not having a housing cost burden. Only 41% of Hispanics are **not cost burdened** in comparison to 52% for the City.

If they have needs not identified above, what are those needs?

In addition to the needs identified above (Housing Problems, Severe Housing Problems, and Housing Cost Burdens), the ethnic and racial populations with disproportionate needs require an array of other services to assist them, including:

- Homebuyer assistance and education programs;
- More aggressive code enforcement to improve rental housing conditions;
- Child care services;
- Additional tenant-based rental assistance funding;
- Additional employment opportunities; and
- Other public services identified in the public input session.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

A large portion of the City's Black/African American population is concentrated in Census Tract 97 with 24% of the population.

NA-35 Public Housing – 91.205(b)

Introduction

The Allentown Housing Authority (AHA) currently owns and manages 987 conventional public housing units, primarily within 10 separate developments located throughout the City of Allentown. Almost all of the public housing units are occupied, with yearly turnover ranging from 2 to 23 units among the 10 developments. This total includes 79 scattered site units located throughout the City of Allentown.

The Public Housing Authority Survey in the Unique Grantee Appendix shows the target population of each development as well as the total units, year built, occupancy rate, and annual unit turnover. Sixty-five percent of the units are designated for elderly tenants overall. The overall annual turnover rate is low, approximately 15% of the units, and the occupancy rates range from 97 to 99%.

The AHA has converted 205 conventional public housing units through the HUD Rental Demonstration Program. Seventy (70) units at Cumberland Gardens received Project Based Vouchers and 135 units at Overlook Park receive Project Based Rental Assistance (PBRA).

In addition, AHA owns and manages 95 units that were acquired and rehabilitated through the federal Section 8 Substantial Rehabilitation Program. These units are also scattered throughout the City. The major unmet need in the City of Allentown reported by AHA was for additional family housing units with a varied bedroom mix. Also, adequate on-site facilities for community programs are seen as a great need.

Overlook Park

There are an additional 79 rental units that are eligible for Section 8 Housing Choice Vouchers at Overlook Park. The first two phases of Overlook Park are coming up on the end of their initial 15-year Low Income Housing Tax Credit (LIHTC) compliance period. Overlook Park was part of a 2005 HUD award that AHA received. This \$20 million HOPE VI Revitalization grant was provided to demolish and rebuild the Hanover Acres and Riverview Terrace (HART) public housing developments and introduce a new mixed-income model of affordable housing and community revitalization to the City of Allentown. Demolition for the project began in June 2006 with the 322 barracks-style Hanover Acres. Hanover Acres was opened in 1939 as Pennsylvania's first public housing for low income workers. AHA temporarily relocated all tenants prior to the demolition. A total of 421 public housing units at Hanover Acres and the adjacent Riverview Terrace have been replaced with 269 rental units for low- and moderate-income residents, a 17,000 square foot community center, a greenway, and park. The project is a public-private partnership between AHA, a private developer, and the City, which contributed funding through its federal HOME Investment Partnerships Program funding. The

rental units are a mix of two-, three-, and four-bedroom townhouses and twin homes. Fifty-three (53) detached homes were built and sold to low- and moderate-income residents. AHA procured the Catholic Social Agency to provide case management and Community Supportive Services and provide management services. AHA leveraged approximately \$40 million from its partners toward the total cost of the project.

Totals in Use

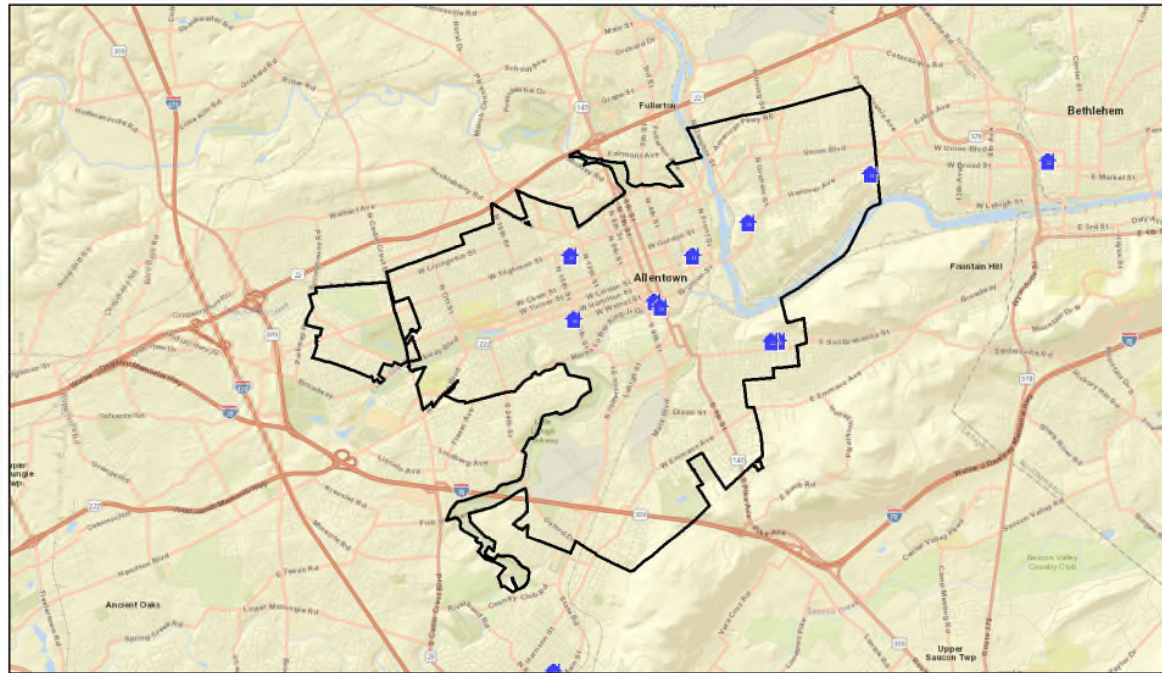
	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	36	1,097	1,383	0	1,379	4	0	0

Table 22 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

Allentown City - Public Housing Developments



March 6, 2020

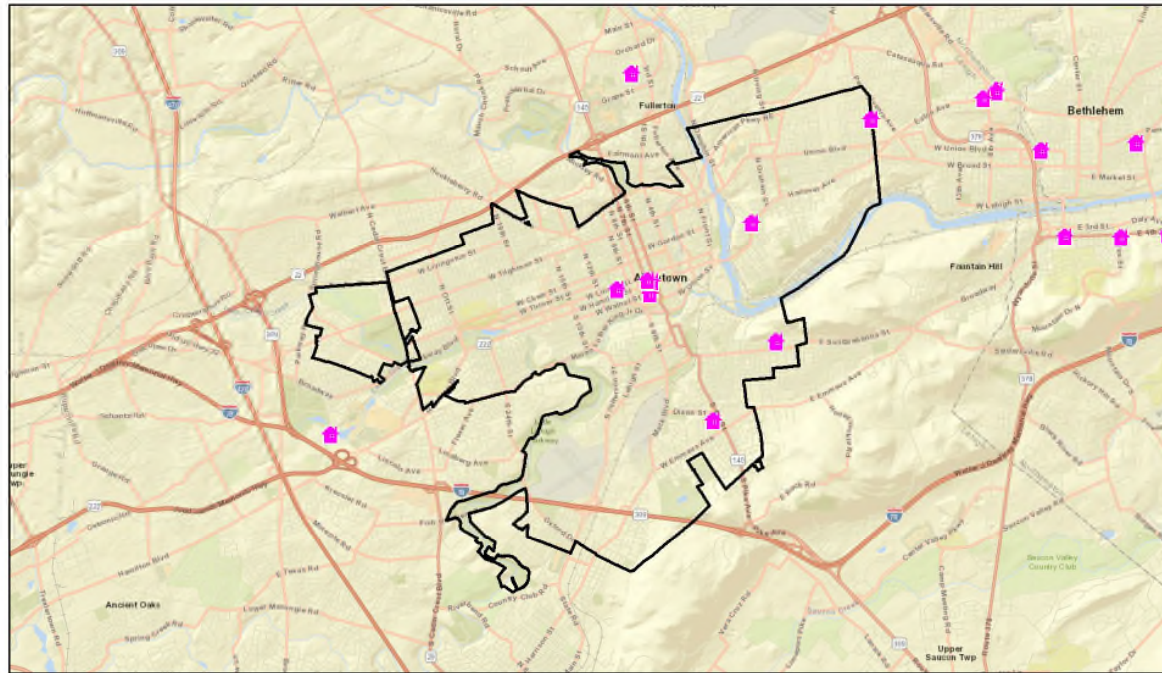
Public Housing Development

Override 1

0 0.75 1.5 3 mi
0 1.25 2.5 5 km
1:104,578
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGA, (c) OpenStreetMap contributors, and the GIS User Community

Public Housing Developments

Allentown City - Low Income Housing Tax Credit Projects



March 6, 2020

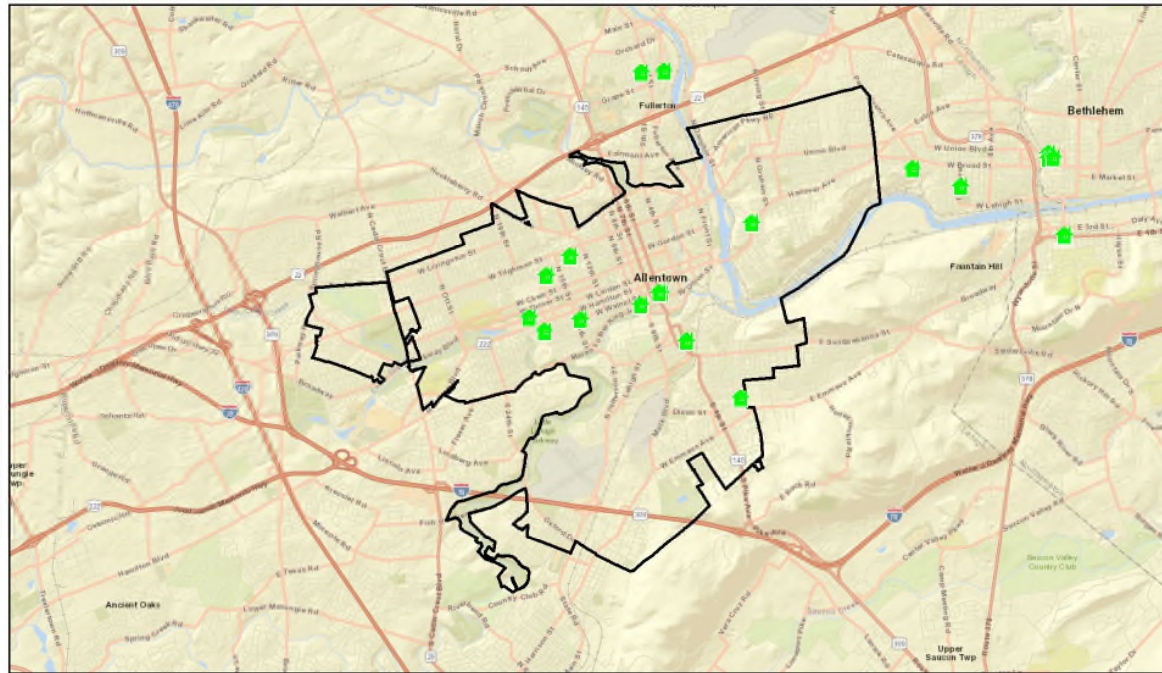
LIHTC Property

Override 1

1:104,578
0 0.75 1.5 3 mi
0 1.25 2.5 5 km
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Low Income Housing Tax Credit Projects

Allentown City - HUD Multifamily Housing Properties



March 6, 2020

■ Multifamily Properties - Assisted

Override 1

1:104,578

0 0.75 1.5 3 mi

0 1.25 2.5 5 km

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

HUD Multifamily Housing Projects

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	9,193	13,137	12,818	0	12,819	12,328	0
Average length of stay	0	5	6	6	0	6	1	0
Average Household size	0	1	2	2	0	2	1	0
# Homeless at admission	0	0	0	1	0	1	0	0
# of Elderly Program Participants (>62)	0	8	535	214	0	212	2	0
# of Disabled Families	0	17	250	465	0	463	2	0
# of Families requesting accessibility features	0	36	1,097	1,383	0	1,379	4	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	30	945	1,088	0	1,085	3	0	0
Black/African American	0	5	134	281	0	280	1	0	0
Asian	0	1	9	5	0	5	0	0	0
American Indian/Alaska Native	0	0	8	7	0	7	0	0	0
Pacific Islander	0	0	1	2	0	2	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	21	616	943	0	941	2	0	0
Not Hispanic	0	15	481	440	0	438	2	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 25 – Ethnicity of Public Housing Residents by Program Type**Data Source:** PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The AHA completed a Green Physical Needs Assessment (GPNA) in 2016.

Applicants that submit applications for Public Housing are asked on the application form whether they are in need of an accessible unit; however, the Housing Authority does not verify the information provided by the applicant until a unit is available for rental. The applicant status may change during the time they are on the waiting list which makes accurate reporting on this information difficult.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

As of January 2020, there are 8,634 families on the waiting list for Public Housing and 13,501 families on the waiting list for the Section 8 tenant based rental assistance program. Of these families, the majority of the families on the list for Public Housing and families on the Section 8 waiting list are Extremely Low Income, indicating a most immediate need for Extremely Low-Income Households.

A copy of the Public Housing Authority Survey is included in the Grantee Unique Appendices.

How do these needs compare to the housing needs of the population at large

The needs identified for the Public Housing Residents and Housing Choice Voucher holders reflects the needs of the population at large.

Discussion

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Homelessness is a complex issue that, in addition to housing cost and availability, often involves problems of addiction, mental health, domestic violence, health, and poverty. Since homelessness has no borders, an emphasis is being placed on a more regionalized approach. This involves expanding efforts throughout Northeast Pennsylvania and moving beyond the City of Allentown to partner with Lehigh and Northampton Counties, as well as the cities of Bethlehem and Easton. Persons who find themselves homeless travel to cities where the services are located, placing an undue burden on the region's cities to provide services for the region's homeless. These larger efforts have included the work of the National Alliance to End Homelessness and the Pennsylvania Interagency Council on Homelessness.

Since 2005, the City of Allentown has participated in the regional CoC process, led by the Eastern Pennsylvania CoC and coordinated at a local level by the Lehigh Valley Regional Homeless Advisory Board (RHAB). The Eastern PA CoC is one of two regional CoC's in Pennsylvania that cover non-entitlement portions of the state in order to receive homeless assistance from HUD. Within the region, the Lehigh Valley RHAB encompasses Lehigh and Northampton Counties, the cities of Allentown, Bethlehem and Easton. Each year, the Lehigh Valley RHAB applies for competitive federal grants for the region to provide homeless housing and support services.

The Eastern Pennsylvania CoC serves as the primary decision-making group for the CoC process. Its responsibilities include ensuring representation of key stakeholders; setting the agenda for full CoC planning meetings; conducting the annual homeless single Point-in-Time count; overseeing the various subcommittees and working groups; completing the annual CoC application; and assisting in reviewing programs, activities, data, and all other efforts that will eliminate homelessness and improve the well-being of homeless persons and families in the northeast region.

Point-in-Time surveys are conducted each year in the month of January. A summary of the Point in Time conducted in January 2019 for Lehigh County is included in the Grantee Unique Appendices.

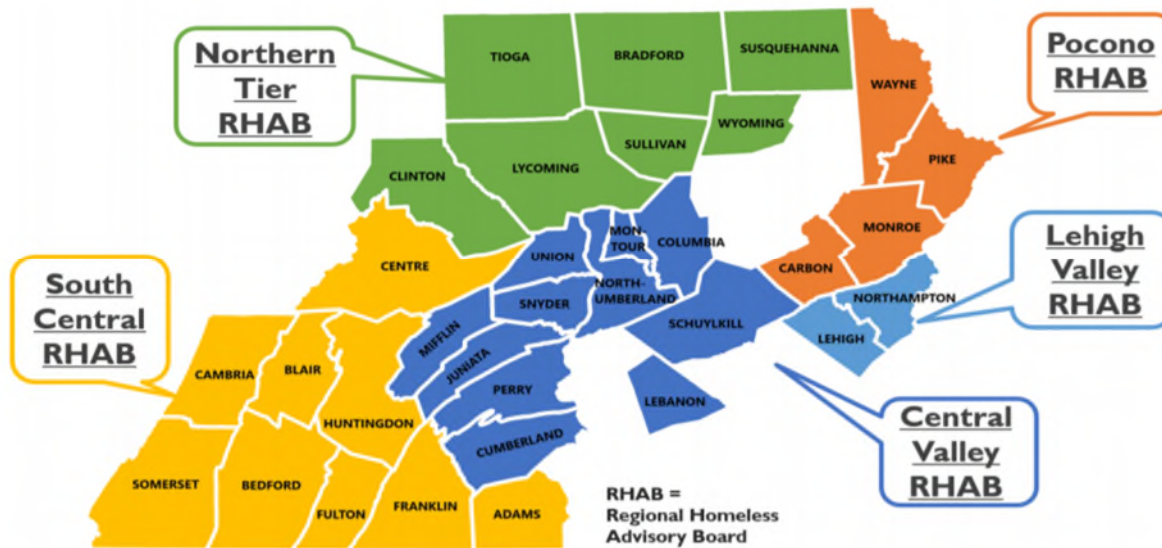
Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	166	824	590	527	82
Persons in Households with Only Children	0	0	3	2	2	27
Persons in Households with Only Adults	56	105	1,605	1,256	1,237	30
Chronically Homeless Individuals	15	13	57	56	55	32
Chronically Homeless Families	0	0	16	16	16	71
Veterans	18	1	176	146	138	33
Unaccompanied Child	7	40	160	139	133	28
Persons with HIV	0	0	17	10	12	24

Table 26 - Homeless Needs Assessment

Data Source Comments:

The source of data for the Homeless Needs Assessment is the 2019 Point in Time County. The figures represent the number of individuals that were experiencing homelessness on a given night in Lehigh County.



Eastern PA CoC Jurisdiction Map

Indicate if the homeless population is: Has No Rural Homeless

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	149	42
Black or African American	87	11
Asian	0	1
American Indian or Alaska Native	1	0
Pacific Islander	1	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	108	7
Not Hispanic	155	49

Data Source**Comments:**

This data was generated by the CoC's Homeless Management Information System for the County of Lehigh.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Families with children - Of the 206 homeless households in Lehigh County counted in the Northeast Pennsylvania Point in Time count in 2019, 51 (25%) were families with at least one child under the age of 18 and one adult. These families included 166 persons. None of the homeless households in Lehigh with at least one adult and one child were unsheltered. Eight were in transitional housing and 43 were in emergency shelters.

Veterans - 19 Homeless veterans were counted in Lehigh County in the 2019 Point in Time Count, 10 more than were counted in 2018. One veteran was unsheltered, 5 were in transitional housing and 13 were in emergency shelter.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

This information is not available.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Individuals and families are categorized as “homeless” if their housing status meets the definition for homeless at 24 CFR 91.5 on the night of the PITC. Homeless individuals and families are further categorized as “sheltered” and “unsheltered” as described below:

Sheltered, or “living in a supervised publicly or privately operated shelter designated to provide

temporary living arrangement (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals),” or

Unsheltered, “with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.”

Of the 51 Unsheltered Persons, 9 were identified as Severely Mentally Ill, five were identified as having a Chronic Substance Abuse problem, and 1 was a Victim of Domestic Violence.

Of the 155 Sheltered persons, 35 identified as Severely Mentally Ill, 6 identified as having a Chronic Substance Abuse problem, 18 were Veterans and 20 were Victims of Domestic Violence.

Discussion:

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

The category of non-homeless persons with special needs includes the most diverse population with the widest array of needs. Many persons with special needs are also the most dependent on government for their income and fundamental support while others are self-sufficient and only need accessible and appropriate housing.

Persons with special needs are those that are physically, emotionally or mentally impaired or suffer from mental illness, developmentally disabled, youth aging out of foster care, persons with addictions, HIV/AIDS and their families and victims of domestic violence. There are consistent patterns between the special needs population and the increased risk for homelessness because of lack of adequate housing facilities. The City of Allentown has a shortage of permanent housing for non-homeless persons with special needs, but there is a well-integrated service delivery system. The City and County agencies that provide services for these populations work closely and cooperatively. The access to mainstream resources for these populations has a well-defined intake system. The main issue is one of capacity and adequate funding.

One common concern among service providers and clients with special needs is that more and larger housing units are needed to accommodate families taking care of the individuals with special needs. They suggest that many families would like to take care of their own family members with special needs, if supportive services, respite for caregivers and appropriate accommodations, such as barrier-free access, could be provided. Especially in the cases of the physically disabled population and the population of persons with AIDS/HIV, much of the supportive housing that is available can only accommodate the individual with special needs, isolating him or her from the supportive environment of a family.

Another concern among clients and advocacy groups is that most housing programs/facilities fail to recognize the persons with special needs often have multiple special needs. For example, a significant percentage of persons with AIDS/HIV also have problems of substance abuse or mental illness. Most residential facilities are often targeted for single specific conditions, such as the mentally ill, the developmentally disabled or substance abusers.

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	0
Area incidence of AIDS	0
Rate per population	0
Number of new cases prior year (3 years of data)	0
Rate per population (3 years of data)	0

Current HIV surveillance data:	
Number of Persons living with HIV (PLWH)	0
Area Prevalence (PLWH per population)	0
Number of new HIV cases reported last year	0

Table 27 – HOPWA Data

Data Source Comments:

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	0
Short-term Rent, Mortgage, and Utility	0
Facility Based Housing (Permanent, short-term or transitional)	0

Table 28 – HIV Housing Need

Data Source Comments:

Describe the characteristics of special needs populations in your community:

The Elderly and Frail Elderly: The estimated number of elderly persons (65+) in Allentown as of the 2017 American Community Survey (ACS) one-year estimate was 13,635 (11.3%) of the population. This percentage is below the percentage for Pennsylvania (17.8%) as well as the nation (15.6%). The percentage of Frail Elderly (75+) in Allentown is 7,063 (5.8%). Again, this trails the state (6.3%) and national percentages (6.3%).

Mental Illness: The National Institute on Mental Health released a study in 2017 that estimated 18.9% of all US adults have an AMI – or Any Mental Health Issue. AMI is defined as a mental, behavioral, or emotional disorder. AMI can vary in impact, ranging from no impairment to mild, moderate, and even severe impairment. Applying that percentage to Allentown’s population suggests that almost 23,000 residents in the City are experiencing an AMI.

The 2017 NIH study estimated that 4.5% of all US adults have an SMI – or Serious Mental Health Issue. SMI is defined as a mental, behavioral, or emotional disorder resulting in serious functional impairment, which substantially interferes with or limits one or more major life activities. The burden of mental illnesses is particularly concentrated among those who experience disability due to SMI. Applying that percentage to Allentown’s population suggests that more than 5,000 residents in the City are experiencing an SMI.

Many nonprofit service providers throughout Lehigh County provide a full range of mental health treatment services, including treatment programs, vocational and educational programs, case

management, housing, transportation, home health aides, self-help assistance, advocacy and recreational opportunities. However, the NIH study suggests that many individuals with AMI and SMI had not received treatment recently. According to the data, only 42.6% of individuals with an AMI received some form of treatment in the past 12 months while 66.7% of individuals with SMI received treatment during that period. Applying these treatment rates locally suggests that nearly 15,000 Allentown residents with some form of mental health issue may be in need of treatment

Physically Disabled: Physically disabled individuals usually require modifications to their living space, including the removal of physical barriers. Generally, accommodations can be made to adapt a residential unit for use by wheelchair-bound persons or persons with hearing or vision impairments. It is difficult to identify private rental units that have been adapted. According to data furnished in the 2009-2013 ACS, there were 12,988 (11.1%) disabled individuals in the City of Allentown. This percentage is well below both the state (15.3%) and national (13.2%) percentages.

What are the housing and supportive service needs of these populations and how are these needs determined?

The non-homeless special needs populations in the City of Allentown have a wide range of service needs, including transitional housing, supportive housing, counseling, case management, transportation to health care facilities and employment, and more. Data and information used to determine priority supportive housing and supportive service needs of the non-homeless special needs populations in the City were derived from interviews and focus group sessions conducted with organizations that serve special needs populations.

Several priorities identified were common across the various subcategories of special needs populations. For example, one priority need identified was more affordable and accessible housing. Renters with physical disabilities have a difficult time finding accessible units in the City. Likewise, Allentown's strong rental market makes it less likely a landlord will make accessibility alterations to a rental unit to accommodate a physically disabled prospective tenant.

Another need recognized was supportive housing facilities with adequate case management components. Access to health care and employment opportunities were also common priorities for all special needs populations. These populations need access to doctor appointments, employment centers, and job training and placement services.

In regard to the elderly and frail elderly populations, services such as benefits counseling, care coordination, and development/rehabilitation of house for visitability were identified as priority needs. Home repair grants, property tax assistance, and utility payment assistance were also listed as priority needs for elderly residents who still own their homes, as this population survives on fixed incomes.

Turning Point, the region's domestic violence emergency shelter reports significant problems with clients attempting to transition from the shelter to mainstream housing. Increases in rents and discrimination against tenants with children are creating a backlog of clients in the shelter and causing new victims to be placed in hotels.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

Allentown City is not a recipient of HOPWA (Housing Opportunities for People with AIDS) funds and therefore is not required to complete this section.

Discussion:

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

Public facilities are defined as public spaces that provide recreational opportunities, community programming and other services. Public facilities include City owned and operated properties such as libraries, senior and community centers, and outdoor recreational spaces. However, there are many privately owned public facilities that also provide vital services to the community, including homeless shelters, daycare centers.

The City of Allentown's 2019 Comprehensive Housing & Economic Development Plan includes a thorough review of public facility needs in Chapter 5: Living Systems. The Plan identified several "principles" to address needs identified by the professionals and community members that contributed to the Plan. They are:

- Plan for a sustainable and resilient Allentown;
- Improve community health outcomes;
- Increase environmental stewardship; and
- Create productive and connected urban landscapes.

A more detail discussion of these needs can be found in SP-25 of this document under the priority need "Improve Living Systems."

How were these needs determined?

All of the City's needs in this Plan were determined by an extensive community outreach campaign undertaken to educate the Allentown Vision 2030 Plan. A series of community public meetings were held along, the results of which were compiled and presented in a popup storefront known as the Community Engagement Center. In addition, the City conducted four (4) focus groups specific to the Consolidated Plan.

Describe the jurisdiction's need for Public Improvements:

The Allentown Vision 2030 Plan discusses public improvement under the heading of "Living Systems." Living Systems address both community and environmental health. Community health includes physical health as well as how Allentonians can thrive in their communities – ensuring neighborhoods are safe, walkable, and promote a culture of health. Environmental health looks at the natural systems that support Allentown, from the greenspaces and parks to the streams and Lehigh River. Ensuring Allentown's Living Systems are healthy, resilient, and sustainable will support a vibrant and prosperous future.

The City of Allentown's 2019 Comprehensive Housing & Economic Development Plan includes a thorough review of public facility needs in Chapter 5: Living Systems. The Plan identified several

“principles” to address needs identified by the professionals and community members that contributed to the Plan. They are:

- Increase environmental stewardship;
- Create productive and connected urban landscapes; and
- Plan for a sustainable and resilient Allentown.

A more detailed discussion of these needs can be found in SP-25 of this document under the priority need “Improve Mobility and Connectivity.”

How were these needs determined?

All of the City’s needs in this Plan were determined by an extensive community outreach campaign undertaken to educate the Allentown Vision 2030 Plan (as well as this Consolidated Plan). A series of community public meetings were held along, the results of which were compiled and presented in a popup storefront known as the Community Engagement Center. In addition, the City conducted four (4) focus groups specific to the Consolidated Plan.

Describe the jurisdiction’s need for Public Services:

In order to improve quality of life for all citizens of Allentown, it is important to provide necessary services that meet daily needs in a convenient and welcoming way. In the Allentown Vision 2030 community planning process, what rose to the top was the importance of providing access to training facilities, grocery stores, banking, and programs to assist returning populations and the homeless. Access to these services defines a just and equitable society and provides a foundation for citizens not just to survive, but to improve their lives.

The main public service needs are centered around more programs for youths and adults, including literacy, job training, and increased mobility options. The primary economic development needs identified were employment training for City residents and financial assistance to upgrade existing businesses. The City and regional service providers acknowledged that the area most in need of CDBG and HOME funds was downtown Allentown.

Community health is closely tied to the places where we live, learn, work and play. Improvements in residents’ health result from limiting exposure to negative conditions, such as poor air quality, flooding, and noise, as well as from adopting of beneficial activities like exercise and healthy eating habits. To improve community health, Allentown can adopt the CDC’s call to “change the context to make healthy choices easier.”

How were these needs determined?

All of the City's needs in this Plan were determined by an extensive community outreach campaign undertaken to educate the Allentown Vision 2030 Plan (as well as this Consolidated Plan). A series of community public meetings were held along, the results of which were compiled and presented in a popup storefront known as the Community Engagement Center. In addition, the City conducted four (4) focus groups specific to the Consolidated Plan.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The Allentown Neighborhood Improvement Zone has generated \$689 million in total investments, development, and revitalization in Center City. New multi-family housing units, while not directly through the NIZ tax credits, have been constructed to provide more downtown housing options targeted at employees in the new office and commercial developments in the NIZ. Additionally, new employers such as ADP have located in the area and invested in new real estate.

Allentown's relative affordability combined with increasing demand may mean rising housing costs. Like many cities across the country, residents want safe, healthy, and affordable housing, a need made more acute by a growing population. A study released in 2017 by the Lehigh Valley Planning Commission projects the Valley's population will grow by as much as 26% through 2040.

According to the 2013-2017 American Community Survey 5-Year Estimates, Allentown's median home value is \$124,000. In comparison to Lehigh County's median home value of \$196,000, Allentown's housing is among the most affordable in the region. This can play in Allentown's favor for regional competitiveness, but it will be important to make sure that within the City there are sufficient housing options to accommodate residents' diverse needs in housing type and cost.

Allentown's relative affordability, despite signs of demand, presents conflicting signals that may indicate a market pivoting from weak to strong. Strong market communities that are adjacent to weak market communities tend to drive demand in those communities. For example, as buyers from the metro areas of Philadelphia and New York-New Jersey seek more affordable options further from urban centers, they increase demand and housing and commercial prices in adjacent markets. In addition, new services such as logistics and warehousing increase demand for land that might have been previously used for housing. Lastly, demographic changes and new residents add demand for affordable and starter housing.

The current level of affordability may be due to many factors, any of which could change over the course of this plan. There has been little new housing in Allentown except for apartment construction and there is likely a mismatch between market demand and the Allentown's available housing types. The current market offers few larger rental units for lower income households, with very few options for 2 and 3+ bedroom units. For more expensive homes, rental opportunities are only 3+ bedroom apartments, and ownership opportunities are almost exclusively single-family detached housing. A lack of housing diversity means households must consume housing that does not meet their preferences, further intensifying pressure on the housing sub-markets with high demand and limited supply. As a result,

households with incomes above \$70,440 per year are “buying down” from their ability to pay, increasing competition with moderate-income households.

The poor condition of much of the older housing and the high percentage of investor-owned properties may also depress housing values, contributing to Allentown’s relatively high concentration of the region’s “naturally occurring affordable housing,” or housing that is affordable due to underinvestment. Additionally, factors like the perceived quality of the school district or lack of amenities can keep housing prices low. If any of these factors change, the housing market could strengthen, which would further reduce the inventory of affordable housing options.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

Data provided by the City of Allentown indicates the City has a total of 47,120 housing units, 26,936 (57%) of which are single-family homes, with the remaining 20,184 (43%) being multi-unit structures.

According to the 2013-2017 American Community Survey, 3.2% of homeownership units were vacant and 7.9% of rental units were vacant. Housing policy analysts typically consider vacancy below 5.0% as a market where there is unmet demand and vacancy above 5.0% as an oversupplied market. Therefore, the ACS data Allentown needed more ownership units and less rental units as of 2017. Community feedback and anecdotal data on the housing market suggests the homeownership and rental markets are undersupplied.

The 2013-2017 American Community Survey goes on to report the City's housing stock is older with 89% of housing units having been constructed before 1990 with 36.9% of units having been built before 1939. The implication of this is that rehabilitation and upgrading of units is an on-going problem, especially as the ACS data shows that 20.8% of residents last moved prior to the year 2000.

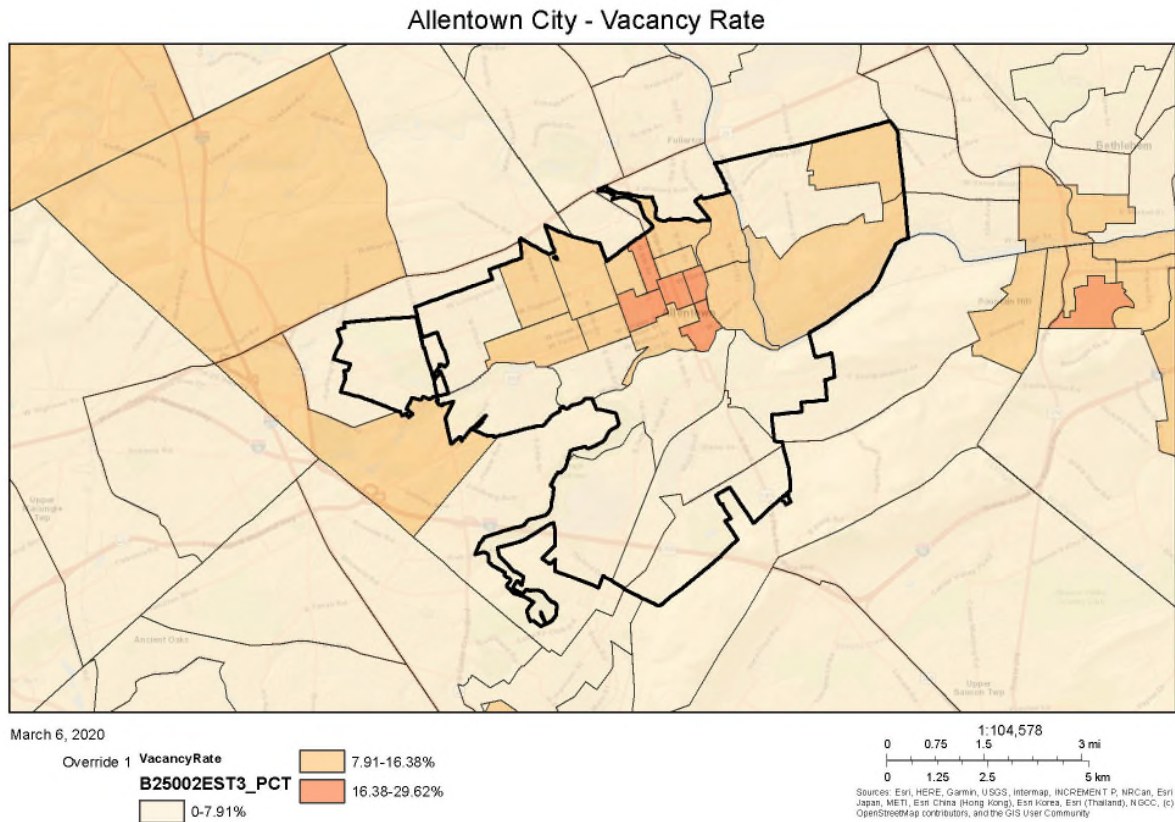
Per the Realty Trac website <http://www.realtytrac.com/statsandtrends/pa/lehigh-county/allentown>, there are currently 136 properties in Allentown, PA that are in some stage of foreclosure (default, auction or bank owned) while the number of homes listed for sale on RealtyTrac is 338.

All residential properties by number of units

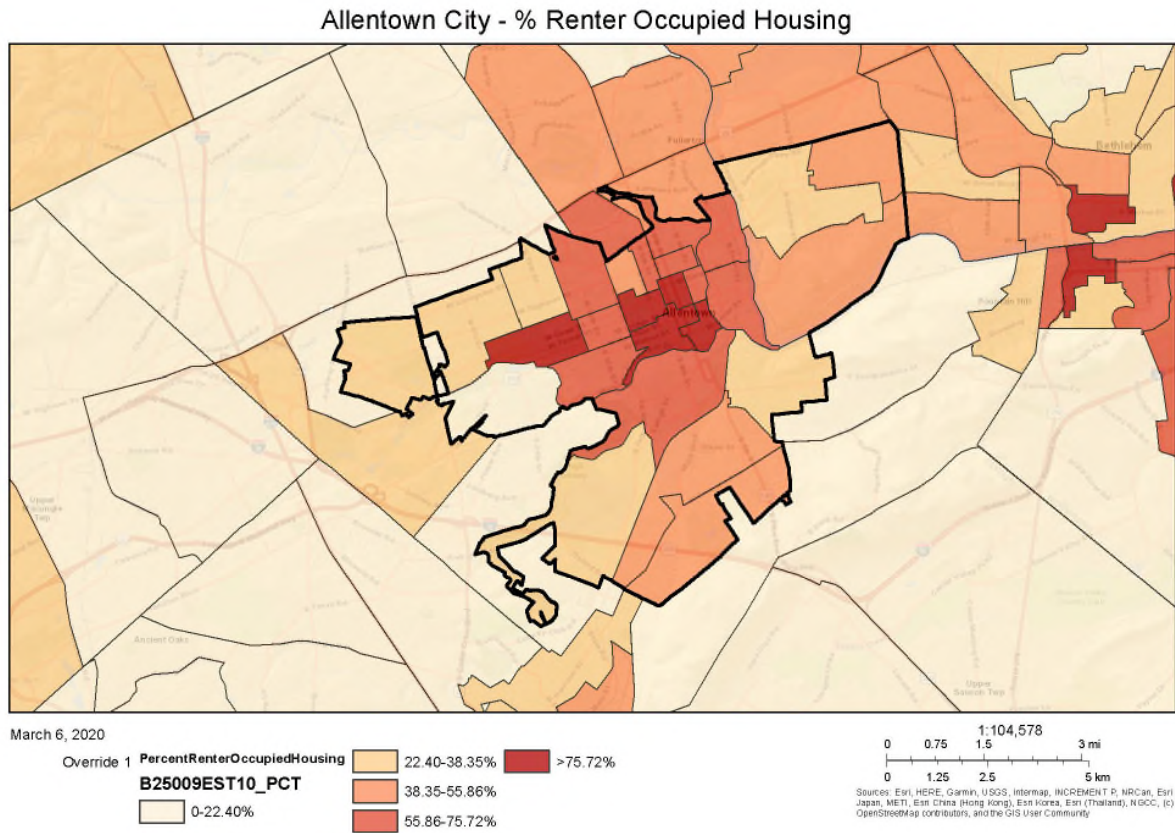
Property Type	Number	%
1-unit detached structure	10,175	22%
1-unit, attached structure	17,685	38%
2-4 units	9,055	20%
5-19 units	5,620	12%
20 or more units	3,360	7%
Mobile Home, boat, RV, van, etc	130	0%
Total	46,025	100%

Table 29 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

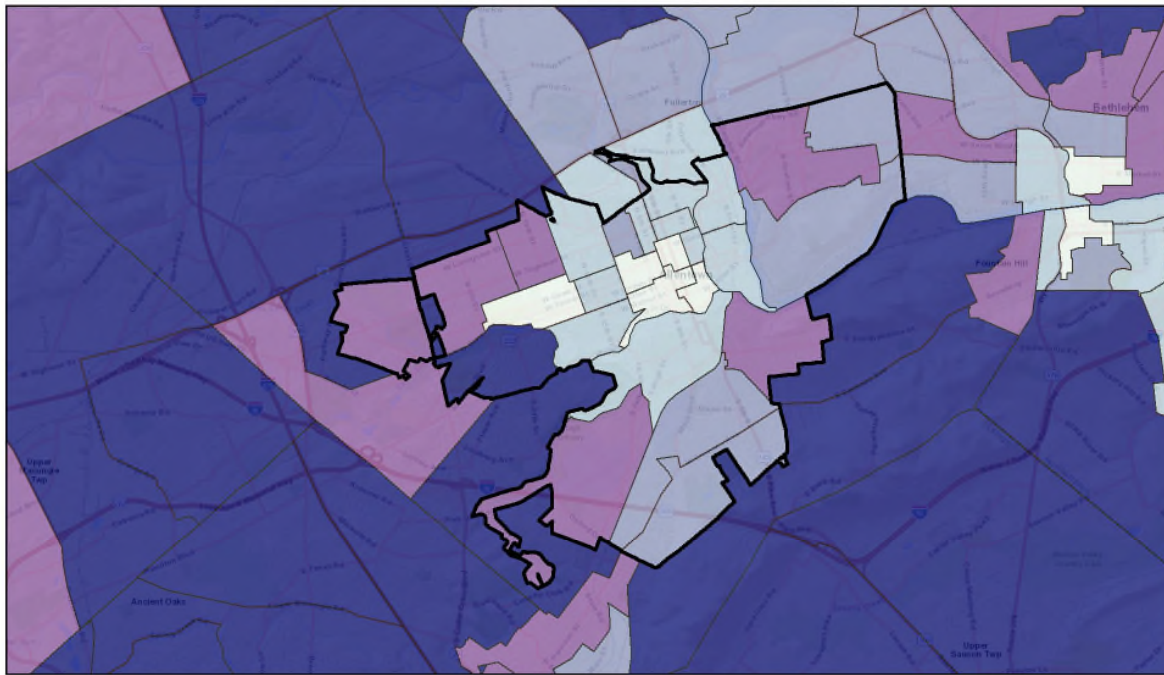


Overall Vacancy Rate



% of Units Renter Occupied

Allentown City - % Owner Occupied Housing



March 6, 2020

Override 1 **OwnerOccupiedHousing**
B25009EST2_PCT

0-26.16% Owner Occupied

26.16-45.84% Owner Occupied
 45.84-62.90% Owner Occupied
 62.90-78.23% Owner Occupied

>78.23% Owner Occupied

1:104,578

0 0.75 1.5 3 mi
 0 1.25 2.5 5 km

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NBC, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NDC, (c) OpenStreetMap contributors, and the GIS User Community

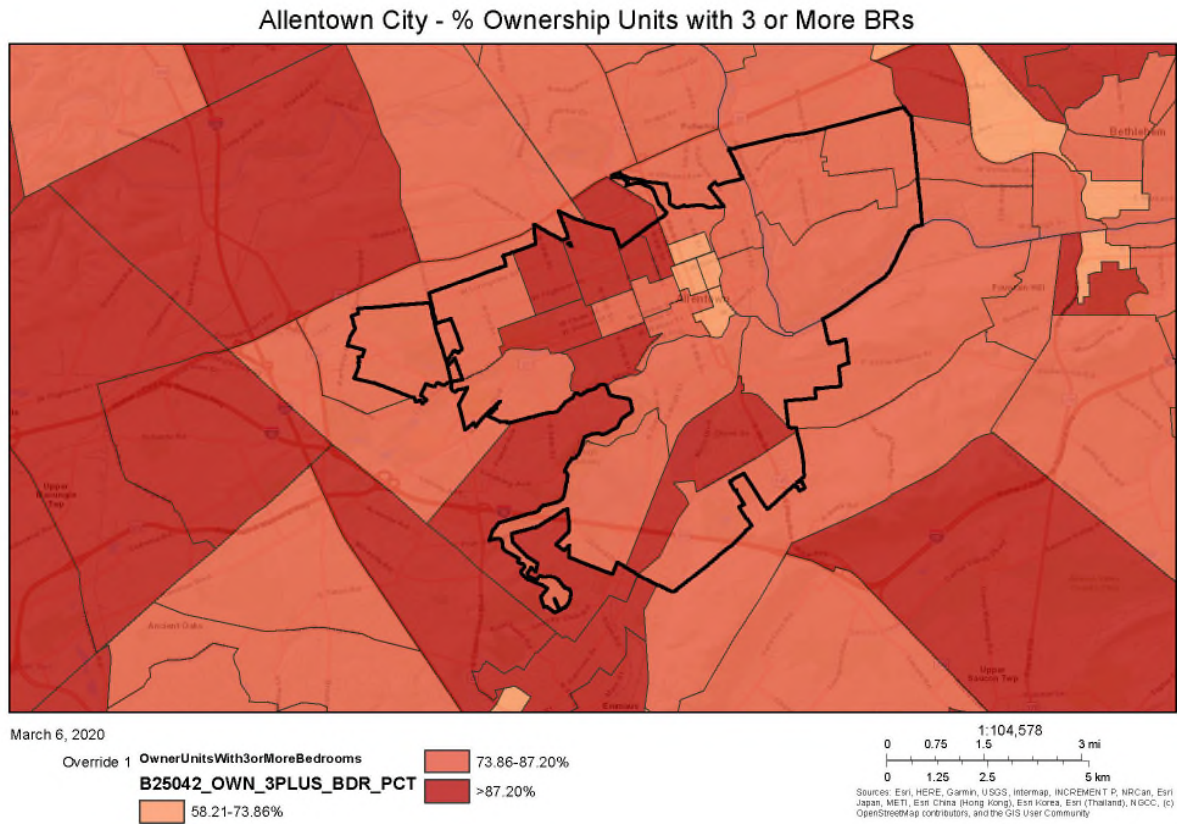
% of Units Owner Occupied

Unit Size by Tenure

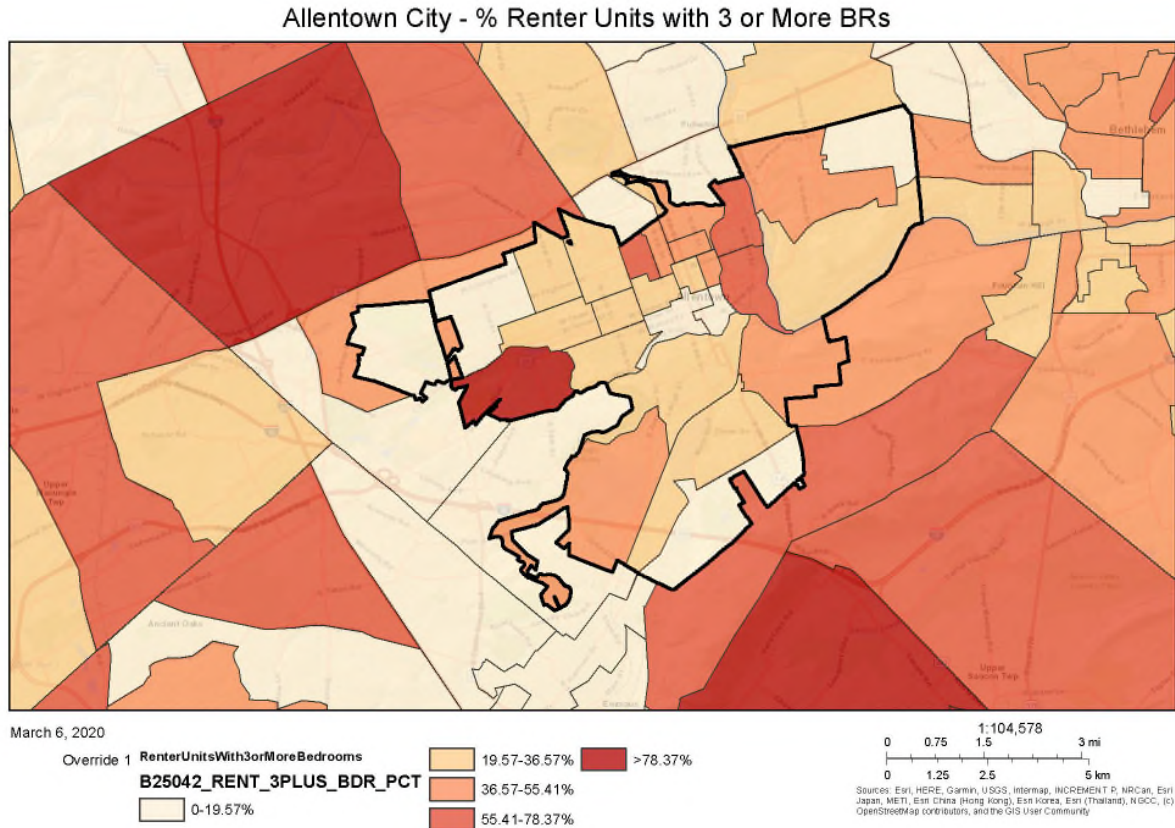
	Owners		Renters	
	Number	%	Number	%
No bedroom	35	0%	710	3%
1 bedroom	295	2%	7,625	34%
2 bedrooms	2,760	15%	6,855	31%
3 or more bedrooms	15,915	84%	7,050	32%
Total	19,005	101%	22,240	100%

Table 30 – Unit Size by Tenure

Data Source: 2011-2015 ACS



Ownership Units with 3+ Bedrooms



Rental Units with 3+ BRs

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The Allentown Housing Authority (AHA) currently owns and manages 987 conventional public housing units, primarily within 10 separate developments located throughout the City of Allentown. Sixty-five percent of the units are designated for elderly tenants overall. The overall annual turnover rate is low, approximately 15% of the units, and the occupancy rates range from 98 to 99%. This total includes 79 scattered site units located throughout the City of Allentown.

The AHA has converted 205 conventional public housing units through the HUD Rental Demonstration Program. Seventy (70) units at Cumberland Gardens received Project Based Vouchers and 135 units at Overlook Park receive Project Based Rental Assistance (PBRA).

In addition, AHA owns and manages 95 units that were acquired and rehabilitated through the federal Section 8 Substantial Rehabilitation Program. These units are also scattered throughout the City. The major unmet need in the City of Allentown reported by AHA was for additional family housing units with a varied bedroom mix. Also, adequate on-site facilities for community programs are seen as a great need.

An additional 310 affordable units are available through the Low-Income Tax Credit Program. These units are for families, seniors, and disabled and are affordable at varying affordability levels from incomes no higher than 30% of the median to 60% of the area median.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

It is not anticipated that any units identified in the above section will be lost from the affordable housing inventory in the next year.

Does the availability of housing units meet the needs of the population?

There will be a continued demand for more rental units in the future; a 2018 HUD Analysis for Allentown-Bethlehem-Easton, determined that there will be a demand for 2,625 rental units between 2018-2021, with only 850 under construction, leaving a gap of 1,775 units.

Although sales and rent levels in Allentown are among the most affordably priced in the Region, many housing units available at these rates are in need of repair and are very old. Most low-income homeowners and homebuyers do not have sufficient resources to finance the cost of repairs needed to upgrade deteriorated housing. Most middle- and upper-income homebuyers with financial capability to buy and improve older housing units are attracted to newly developed housing with modern amenities and are not interested in older homes and/or living in neighborhoods where public safety and quality of life problems are significant.

Despite the City's affordability, there are still shortages of rental and homeownership units in decent condition that are affordable to extremely low- and low-income households. As discussed in the Needs Assessment, there are a significant number of renter and homeowner households with severe housing cost burden (paying over 50% of household income for housing) and households with a moderate housing cost burden (paying 30-50% of their household income for housing).

Describe the need for specific types of housing:

Affordable Rental housing for low-income and extremely low-income (including homeless) households continues to be in high demand due to the existing condition of the market rate units and the fact that market rents often translate into high housing costs burden for low-income families. Special Needs handicapped accessible housing assistance continues to be needed, especially for the frail elderly and physically disabled population. Likewise, affordable housing for families with children remains a need throughout the City as evidenced by the numbers of people experiencing overcrowding. Affordable homeownership units are needed to increase the homeownership percentages in the City and increase of the number of units in decent, safe, and sanitary condition.

Discussion

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

According to the 2013-2017 American Community Survey 5-Year Estimate, the median monthly housing costs for mortgaged owners was \$1,446, non-mortgaged owners \$515, and renters \$885. 26.9% of owners with mortgages, 15.7% of owners without mortgages, and 49% of renters in the City of Allentown, spent 30 percent or more of household income on housing.

Allentown's homeownership rate continues to decline. The 2013-2017 American Community Survey 5-Year Estimate reported that 43.4% of the City's occupied housing units were owner-occupied, compared to 56.6% in the 1990 U.S. Census. The County of Lehigh has a homeownership rate of 65.3% according to the 2013-2017 American Community Survey 5-Year Estimate – more than twenty percentage points greater than the City of Allentown.

According to www.trulia.com, the median sales price for homes in Allentown for the period September 2018 to August 2019 was \$165,000 – a 45% increase in median home value from a twelve-month period ending in 2015. There are currently 338 homes listed for sale in Allentown on zillow.com, as well as 168 homes in the pre-foreclosure. No homes are currently listed as foreclosed and bank owned.

On September 5, 2019, there were 135 available rental units listed www.zillow.com. The rents started at \$669 for one- and two-bedroom units. A copy of the units listed is included in the Grantee Unique Appendices section of this plan. The National Low-Income Housing Coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in counties and certain municipalities in the United States in 2014. In the Allentown-Bethlehem-Easton HMFA, the Fair Market Rent (FMR) for a two-bedroom apartment is \$974. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn \$3,246 monthly or \$38,952 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of \$18.73. A copy of the National Low-Income Housing Coalition data is included in the Grantee Unique Appendices According to www.zillow.com: “The median home value in Allentown is \$136,200. Allentown home values have gone up 7.4% over the past year and Zillow predicts they will rise 4.4% within the next year. The median list price per square foot in Allentown is \$98, which is lower than the Allentown-Bethlehem-Easton Metro average of \$133. The median price of homes currently listed in Allentown is \$144,876 while the median price of homes that sold is \$116,900. The median rent price in Allentown is \$1,199, which is lower than the Allentown-Bethlehem-Easton Metro median of \$1,495” (<https://www.zillow.com/allentown-pa/home-values/>). Zillow.com gives the Allentown housing market its highest rating -- “Very Hot.”

The National Low-Income Housing Coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in counties and certain municipalities in the United States. In the Allentown-Bethlehem-Easton HMFA, the Fair Market Rent (FMR) for a two-bedroom apartment is \$1,129. In order to afford this level of rent and utilities, without paying more than 30% of income on

housing, a household must earn \$3,763 monthly or \$45,160 annually. Described another way, this is the equivalent of 3.0 full time jobs at minimum wage. A copy of the National Low-Income Housing Coalition data is included in the Grantee Unique Appendices.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	137,500	126,900	(8%)
Median Contract Rent	657	739	12%

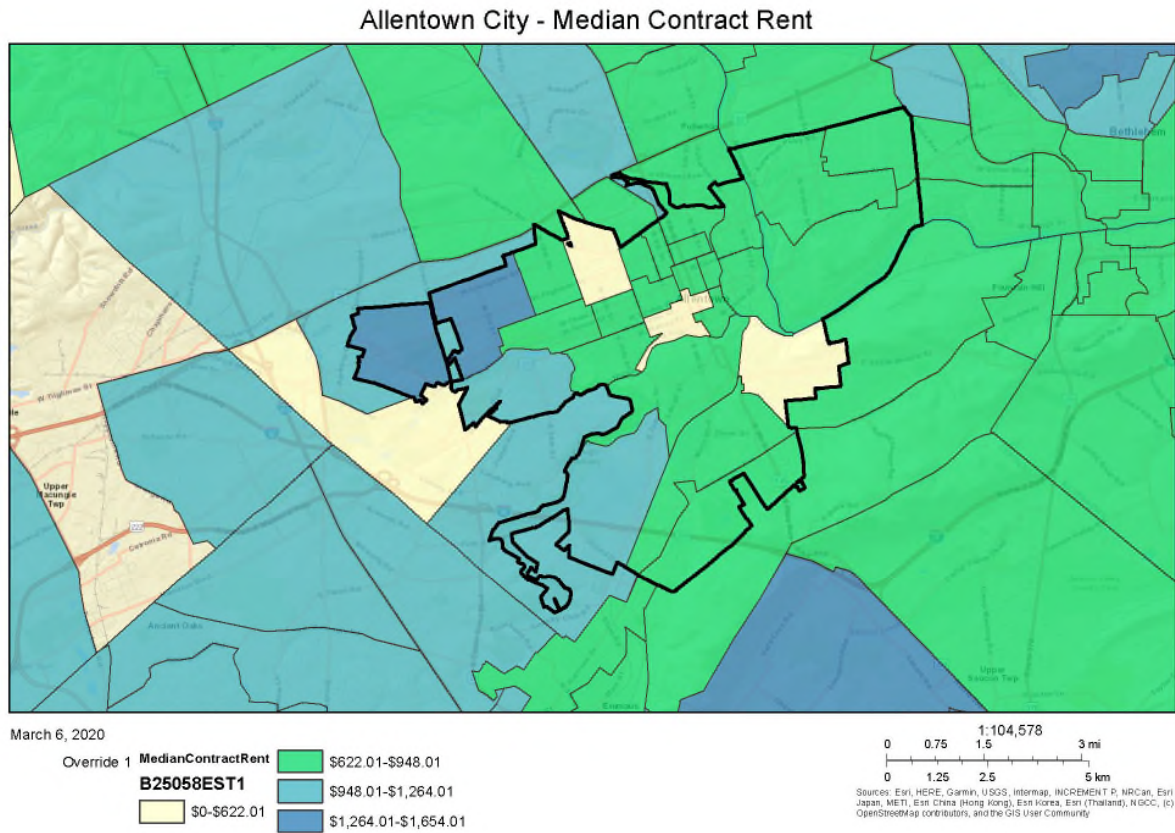
Table 31 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	3,710	16.7%
\$500-999	15,405	69.3%
\$1,000-1,499	2,775	12.5%
\$1,500-1,999	250	1.1%
\$2,000 or more	98	0.4%
Total	22,238	100.0%

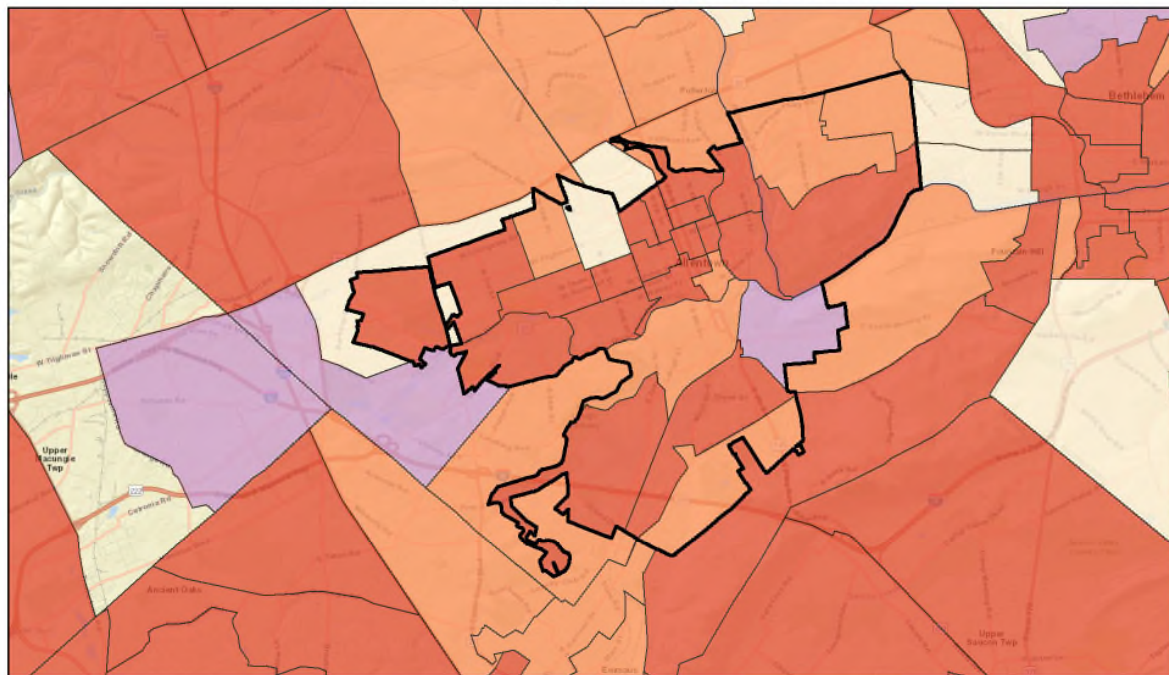
Table 32 - Rent Paid

Data Source: 2011-2015 ACS



Median Contract Rent

Allentown City - Change in Median Contract Rent



March 6, 2020

Override 1 ChangeInMedianRent

PCT_MED_CONTRACT_RENT

16.12-27.13%

27.13-37.74%

37.74-51.57%

>51.57%

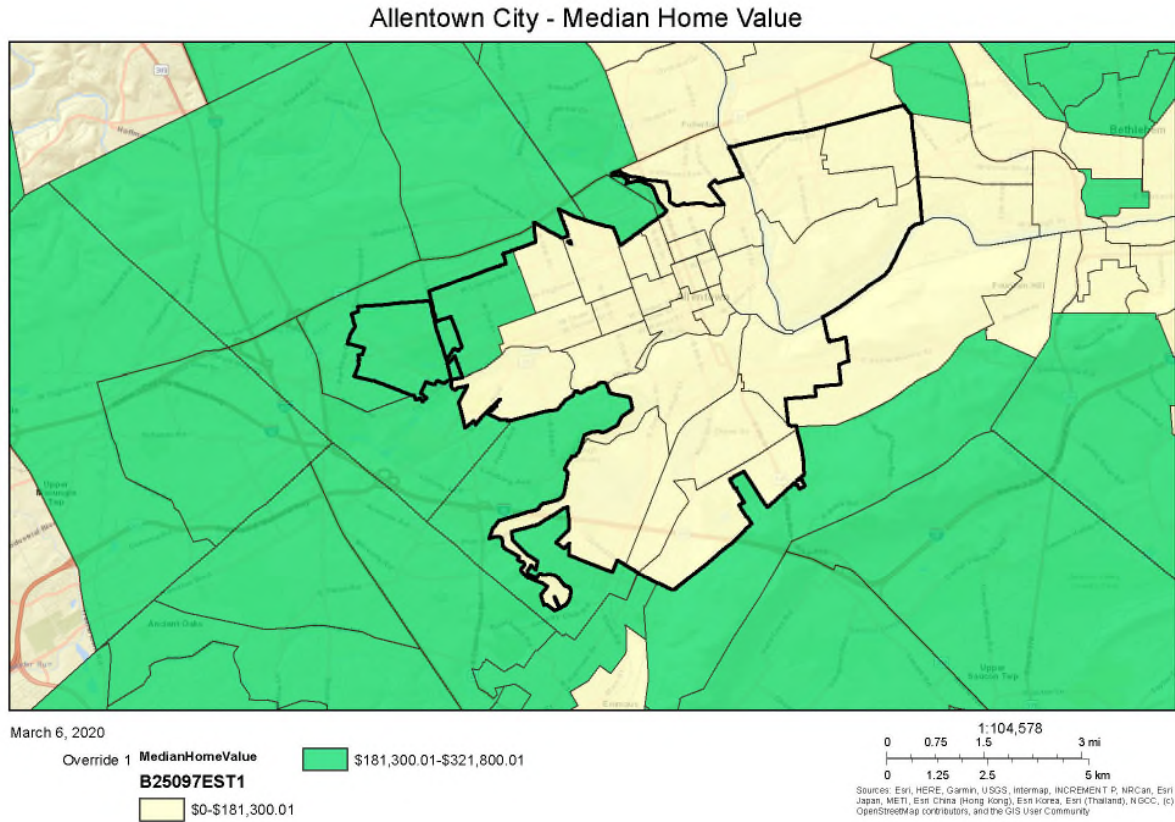
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0 0.75 1.5 3 mi

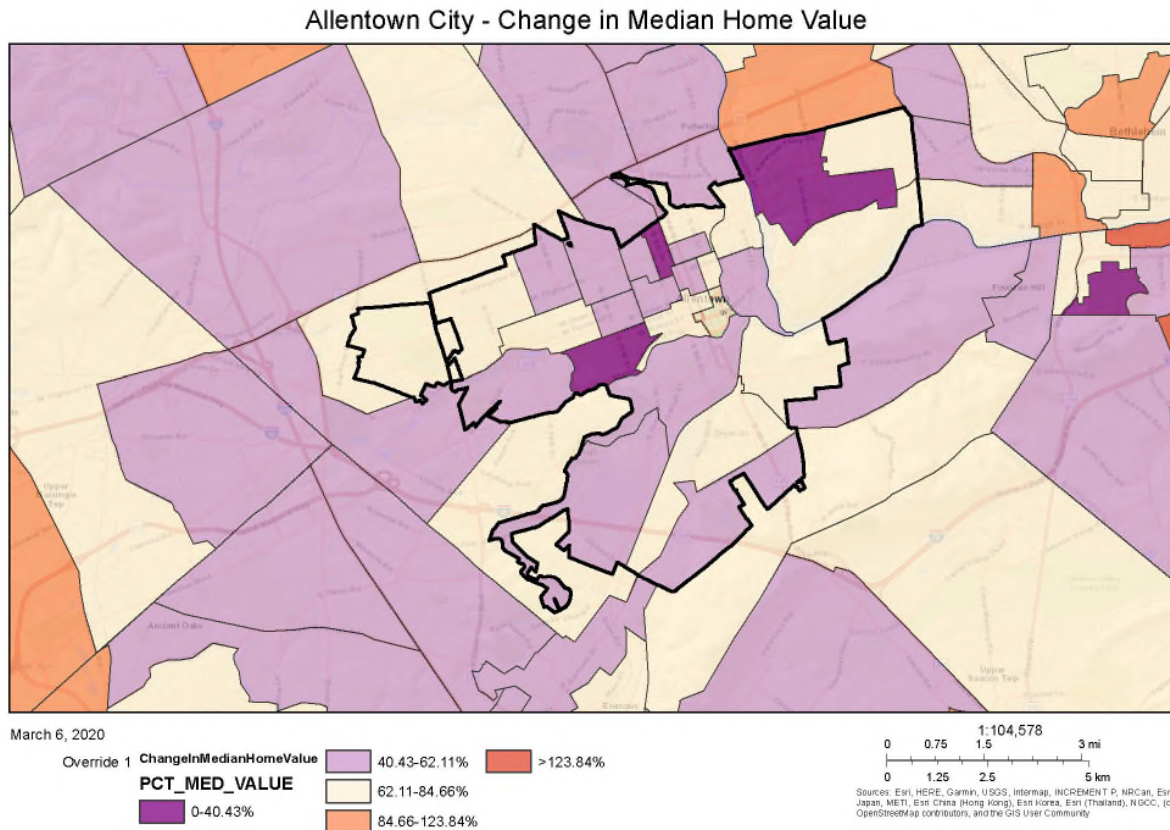
0 1.25 2.5 5 km

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NBCor, Esri, Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NODC, (c) OpenStreetMap contributors, and the GIS User Community

% Change in Median Contract Rent



Median Home Value



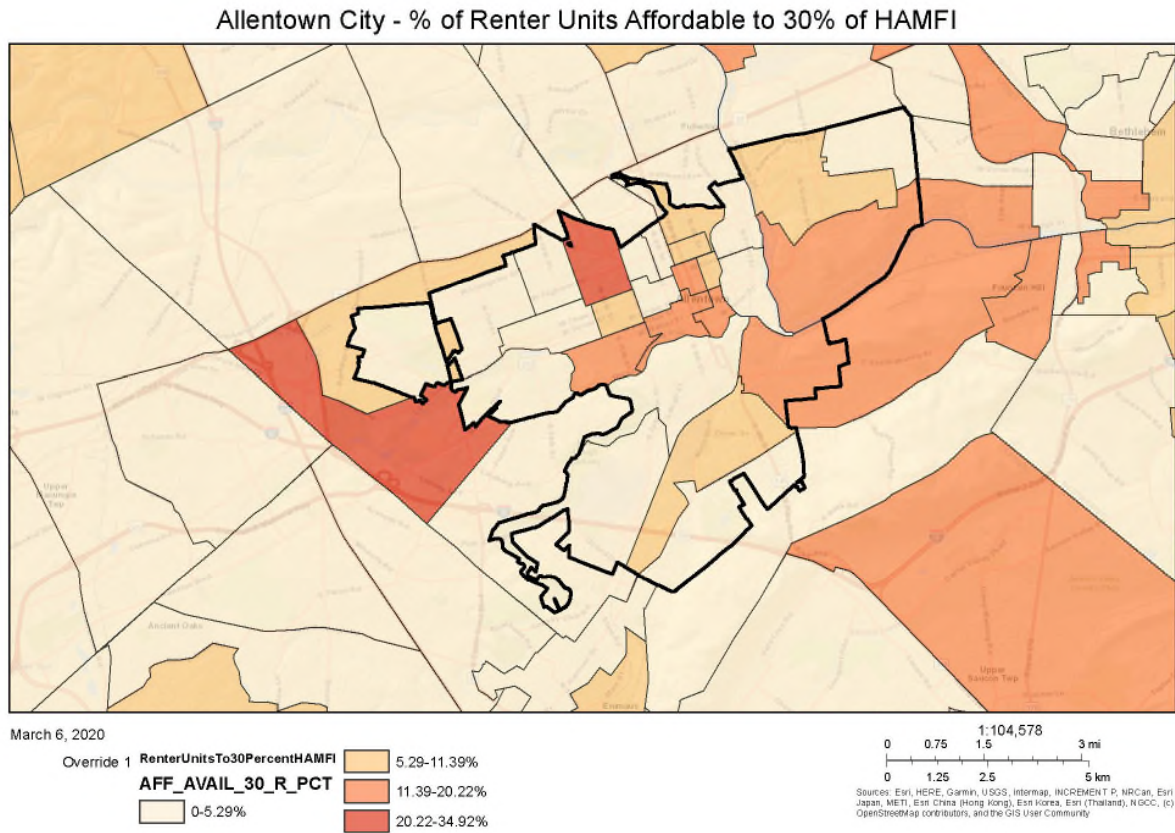
Change in Median Home Value

Housing Affordability

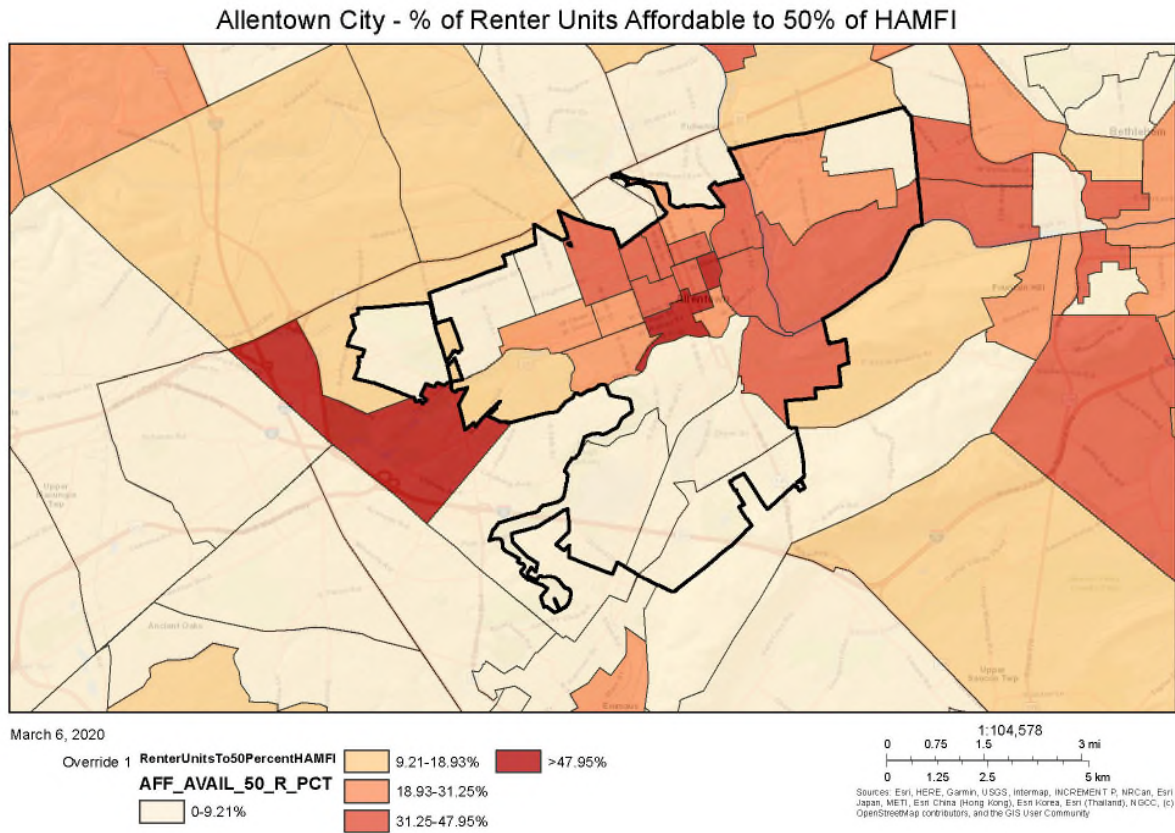
% Units affordable to Households earning	Renter	Owner
30% HAMFI	2,025	No Data
50% HAMFI	6,455	3,100
80% HAMFI	18,340	7,915
100% HAMFI	No Data	10,770
Total	26,820	21,785

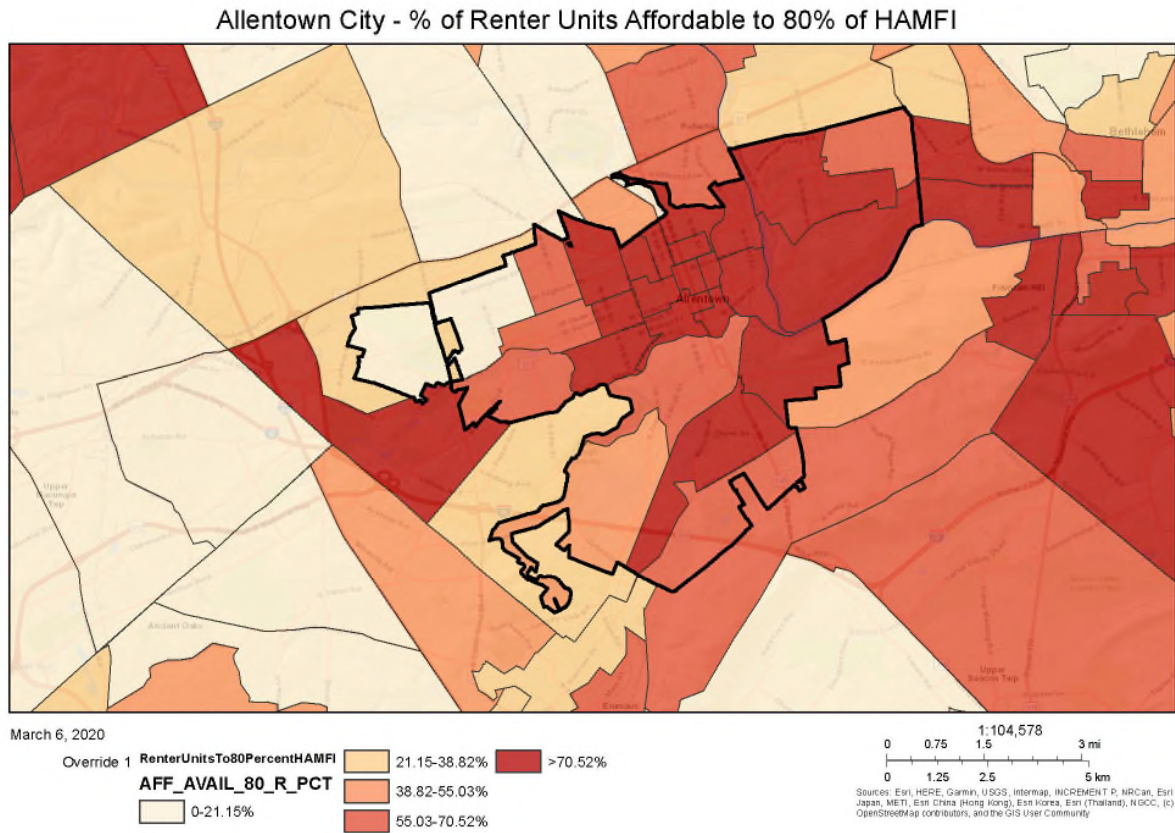
Table 33 – Housing Affordability

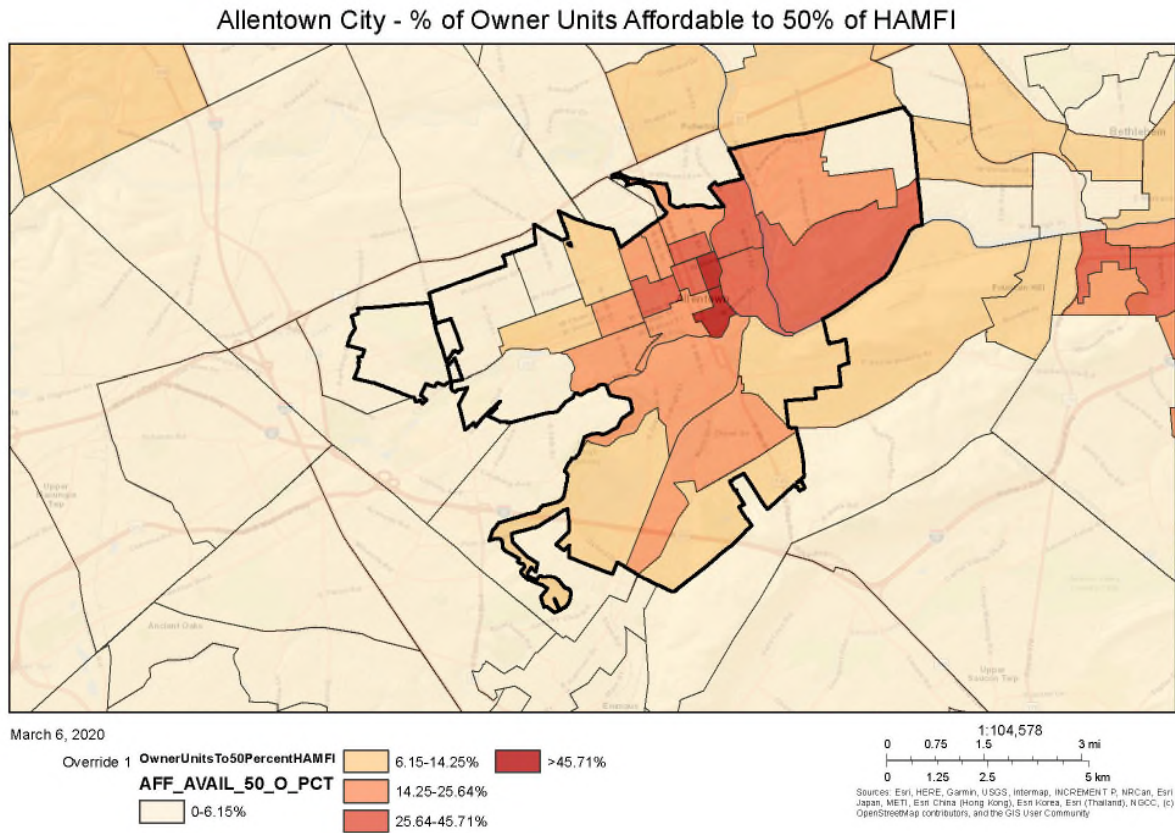
Data Source: 2011-2015 CHAS



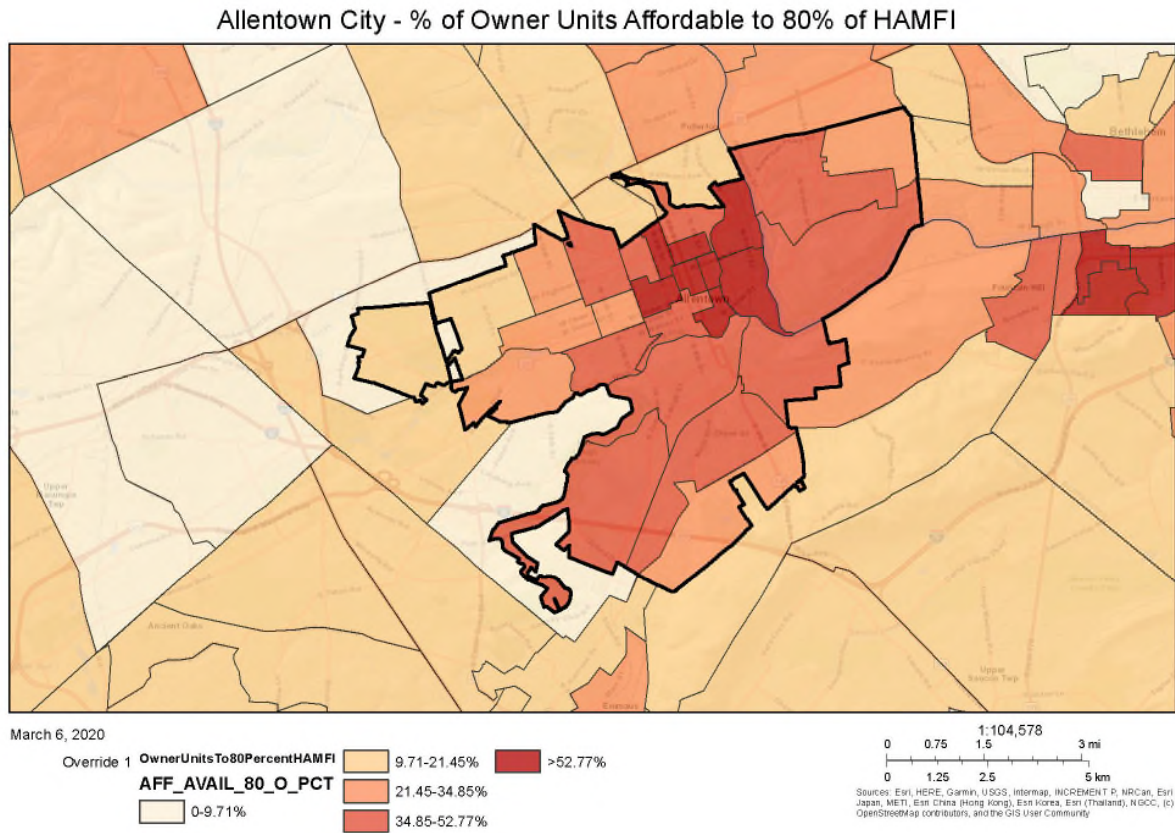
% of Rental Units Affordable to 30% HAMFI

**% of Rental Units Affordable to 50% HAMFI**

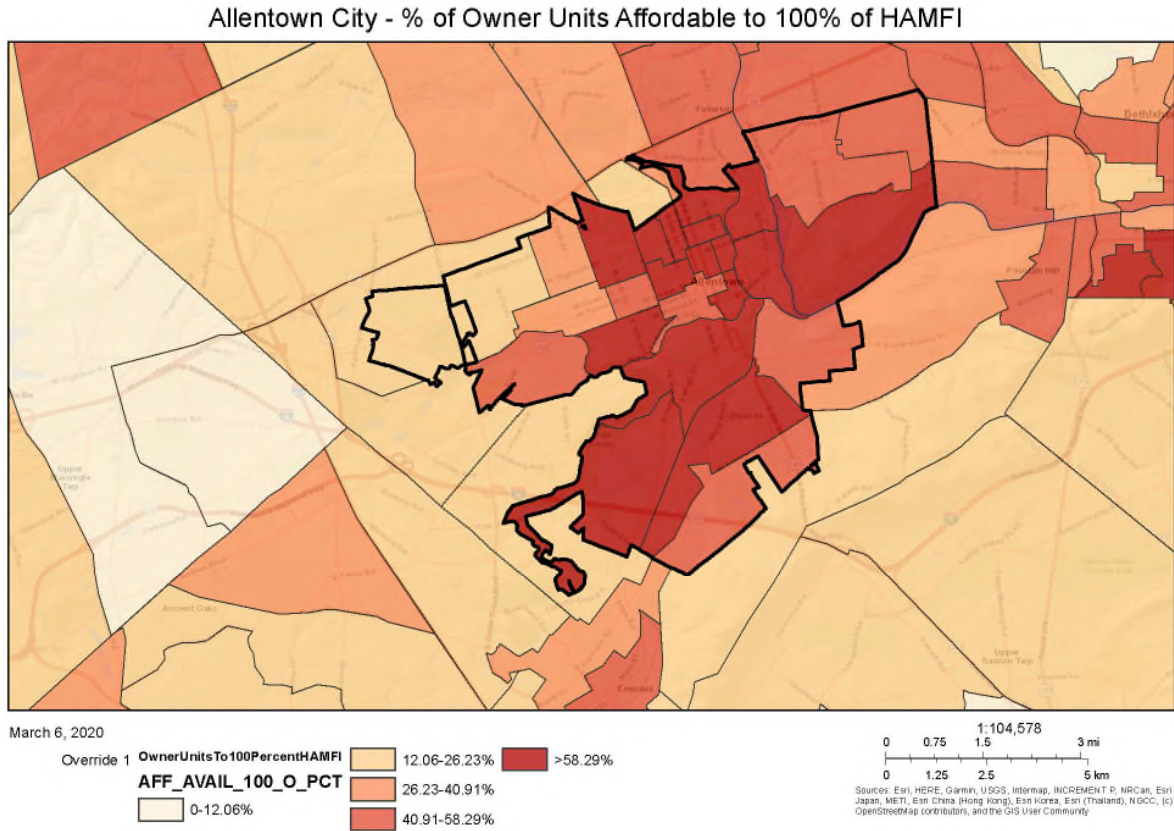
**% of Rental Units Affordable to 80% HAMFI**



% of Ownership Units Affordable to 50% HAMFI



% of Ownership Units Affordable to 80% HAMFI



% of Ownership Units Affordable to 100% HAMFI

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	668	824	1,048	1,352	1,427
High HOME Rent	668	824	1,048	1,227	1,350
Low HOME Rent	653	700	840	970	1,082

Table 34 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

In addition to the demand for market-rate housing, the City of Allentown and the Lehigh Valley needs more healthy and safe housing that is affordable for those making at or below the area's average median income. In particular, those households earning less than half of the area median income have an extremely difficult to finding affordable rental and ownership housing options in Allentown.

Affordable housing is more difficult to build than market-rate housing and often has to have some subsidy to make up the gap between the cost of construction and the revenue generated by renting or

selling the units. Coordinated action between the city and its partners can make it easier to build more affordable housing through programs, incentives, and funding opportunities.

As part of the Allentown Vision 2030 planning process, an online survey was conducted from November 16th - December 20th, 2018 . The survey was distributed with the purpose of gathering community input about the future of Allentown. There were 1,215 total survey respondents, and 116 of them were completed in Spanish. Twenty-nine (29%) of respondents said affordable housing was the top investment that would improve their quality of life.

Demographics in NA-10 indicate that Housing Problems, Cost Burdens, and Crowding, renters earning less than 30% of the median and between 30% and 50% of the median are affected by these problems more than those of renters earning more than 50% of the median and owners on a consistent basis. Without some type of rental assistance, this portion of the population is in danger of homelessness.

How is affordability of housing likely to change considering changes to home values and/or rents?

According to Zillow's Allentown Housing Market Overview, the Zillow Home Value Index went from \$90,500 in January of 2015 to \$137,000 in September 2019 – an increase of more than 50%. Zillow goes on to project homes will increase another 3.6 percent to \$142,000 in the next 12 months.

Zillow's analysis of rent prices during the period between January 2015 and September 2019 showed a more modest increase of 8 percent – from \$1,179 to \$1,274. Zillow does not provide projections for rental rates.

These housing increases do not correlate with earnings increases or inflation. Between 2017 and 2013, median household income increased from \$35,560 to \$38,522. On average, the median household income has been increasing by a rate of just 2.0 percent. If this trend continues, the gap between housing prices and income will continue to increase, resulting in shortfalls of housing that is affordable.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The gaps between the high and low HOME rents and the Fair Market Rents is very low for the High HOME rents, but greater for the Low HOME rents in the Bethlehem/Allentown/Easton HUD area. The difference between the Fair Market Rent and both the high and low HOME rents are slightly less for the smaller units such as the efficiencies and one bedroom, but greater for the units in the highest demand such as the two- and three-bedroom units. The gap between the Low HOME rents and the Fair Market rents for a two-bedroom unit is \$208. Meanwhile the gap between the Low HOME rents and Fair Market Rents for a 4-bedroom unit is \$345.

The gap between the Low HOME rents and the fair market rents is greatest for the units in the greatest demand making it challenging to provide affordable housing options for households that require more than one bedroom. This fact coupled with increased demand for housing in the area, as well as increasing prices make it difficult to provide enough affordable housing.

Producing new affordable housing options is also difficult because the incentive to produce market rate housing and the profits associated with these types of developments outpace the incentives for affordable housing construction.

Discussion

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Using indicators of housing deficiency available from HUD's data included below, the following narrative describes the condition of the housing stock in Allentown. A structure's age is used to demonstrate the amount of time a unit has been in the housing inventory and the duration of time over which substantial maintenance is necessary. In the absence of routine maintenance, older housing usually becomes substandard. The age threshold used to signal a potential deficiency is 50 years or more. Per HUD's data included below, there were 19,040 units built before 1950 -- or 46% of the City's housing stock.

The data identifies a total of 18,720 units, both Owner Occupied and Rentals have at least One Selected Condition. This represents a total percentage of 45%. Overcrowding is directly related to the wear and tear sustained by a housing unit. More than one person per room (1.01 persons or more) is used as a threshold for defining living conditions as overcrowded. The HUD data included in section NA-10 of this plan identifies 925 Renter households and 170 Owner Occupied Households affected by overcrowding in their living environment.

As a result of these statistics, the City's goals include reducing overcrowding in housing units as defined in the City's Property Maintenance Code, in addition to physical improvements for properties. The deteriorated condition of some existing housing units can be attributed to speculators sitting on land, not making substantial improvements, and waiting for developers or the City to make substantial offers on these properties.

Definitions

In Allentown, a housing unit is considered "standard" if it is in compliance with municipal housing and property maintenance codes. Because these codes "grandfather" certain pre-existing conditions associated with factors such as minimum room sizes and stairway widths, the precise number of housing units that can be categorized as standard based on a consistent application of municipal codes cannot be determined.

For the purposes of the Consolidated Plan, a housing unit is termed "substandard" if it requires major repair or replacement of one or more major systems or it requires rehabilitation costing \$25,000 or more in order to achieve compliance with municipal codes.

Census data and other statistics are not sufficient guides for determining whether a substandard property is suitable for rehabilitation. Since a high percentage of houses in the city were built before 1980, age of housing, by itself, is not a useful indicator. However, the City has experienced substantial issues with lead abatement, which presents strong correlation to the age of the housing stock. Because major systems repair and replacement needs vary widely in scope and cost, the existence of major systems deficiencies, by itself, is not a useful indicator either. Some vacant houses may be suitable for

rehabilitation, but the determination of whether or not a particular house is to be rehabilitated should be based on a variety of factors including house and block conditions, real estate market characteristics, and the level of construction required to complete rehabilitation. With regard to the latter factor, the City will not provide development subsidy funding for housing ventures that exceed Section 211(D)(3) limits.

Selected conditions are similar to housing problems in the Needs Assessment and are as follows: (1) lacks complete plumbing facilities, (2) lacks complete kitchen facilities, (3) more than one person per room, and (4) cost burden greater than 30%.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	6,275	33%	12,445	56%
With two selected Conditions	155	1%	910	4%
With three selected Conditions	4	0%	10	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	12,570	66%	8,875	40%
Total	19,004	100%	22,240	100%

Table 35 - Condition of Units

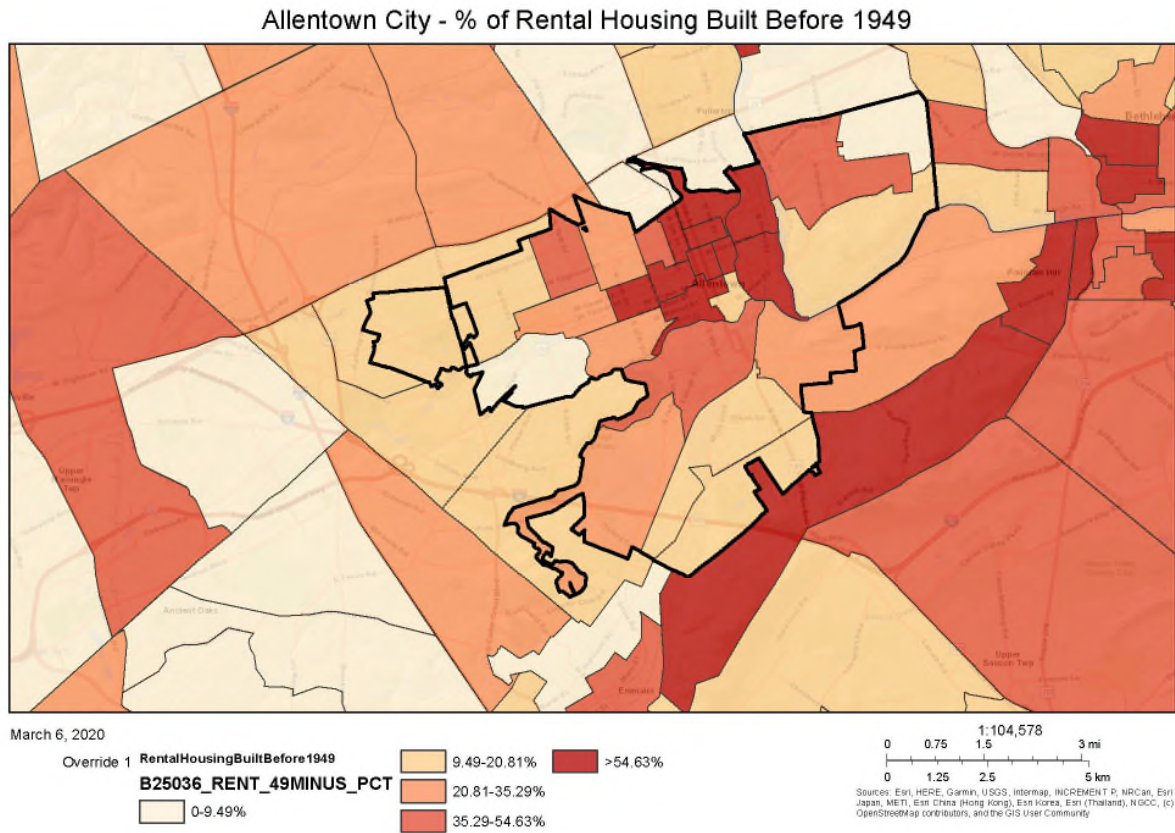
Data Source: 2011-2015 ACS

Year Unit Built

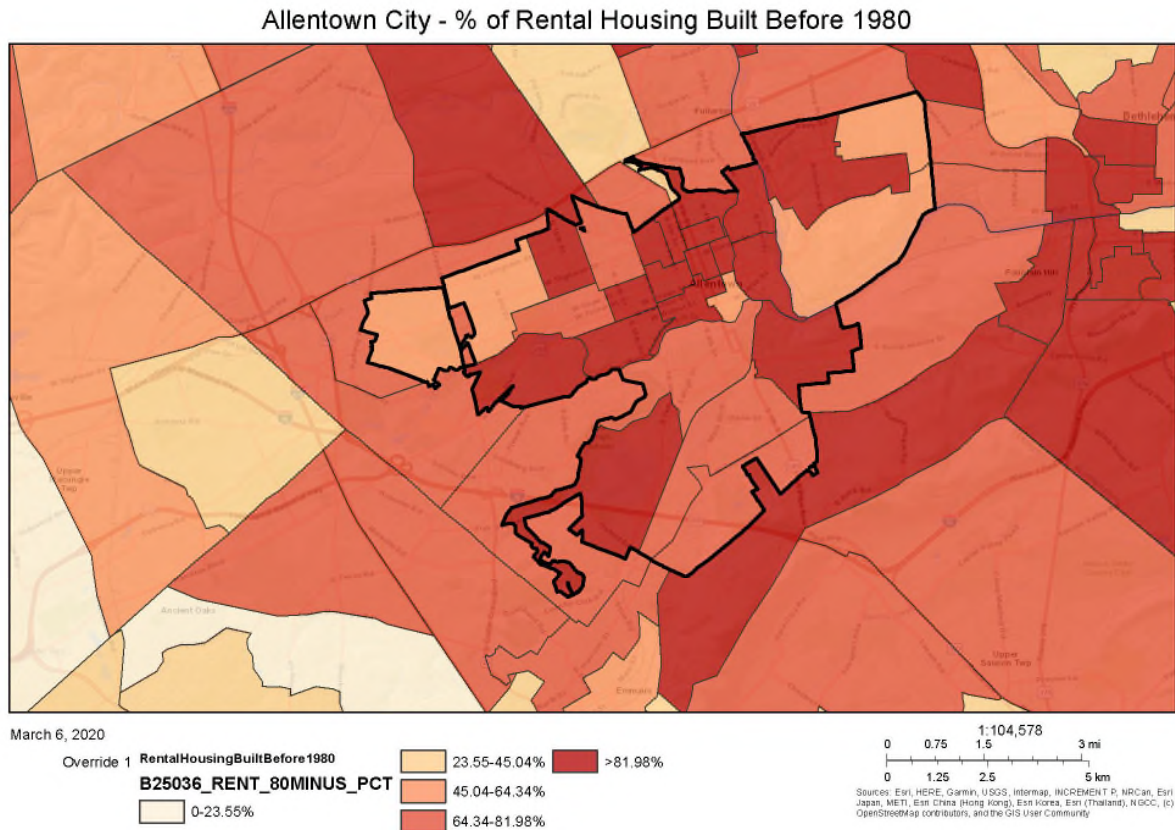
Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	855	5%	1,240	6%
1980-1999	1,440	8%	2,695	12%
1950-1979	7,025	37%	8,940	40%
Before 1950	9,680	51%	9,360	42%
Total	19,000	101%	22,235	100%

Table 36 – Year Unit Built

Data Source: 2011-2015 CHAS



% of Rental Housing Built Before 1949



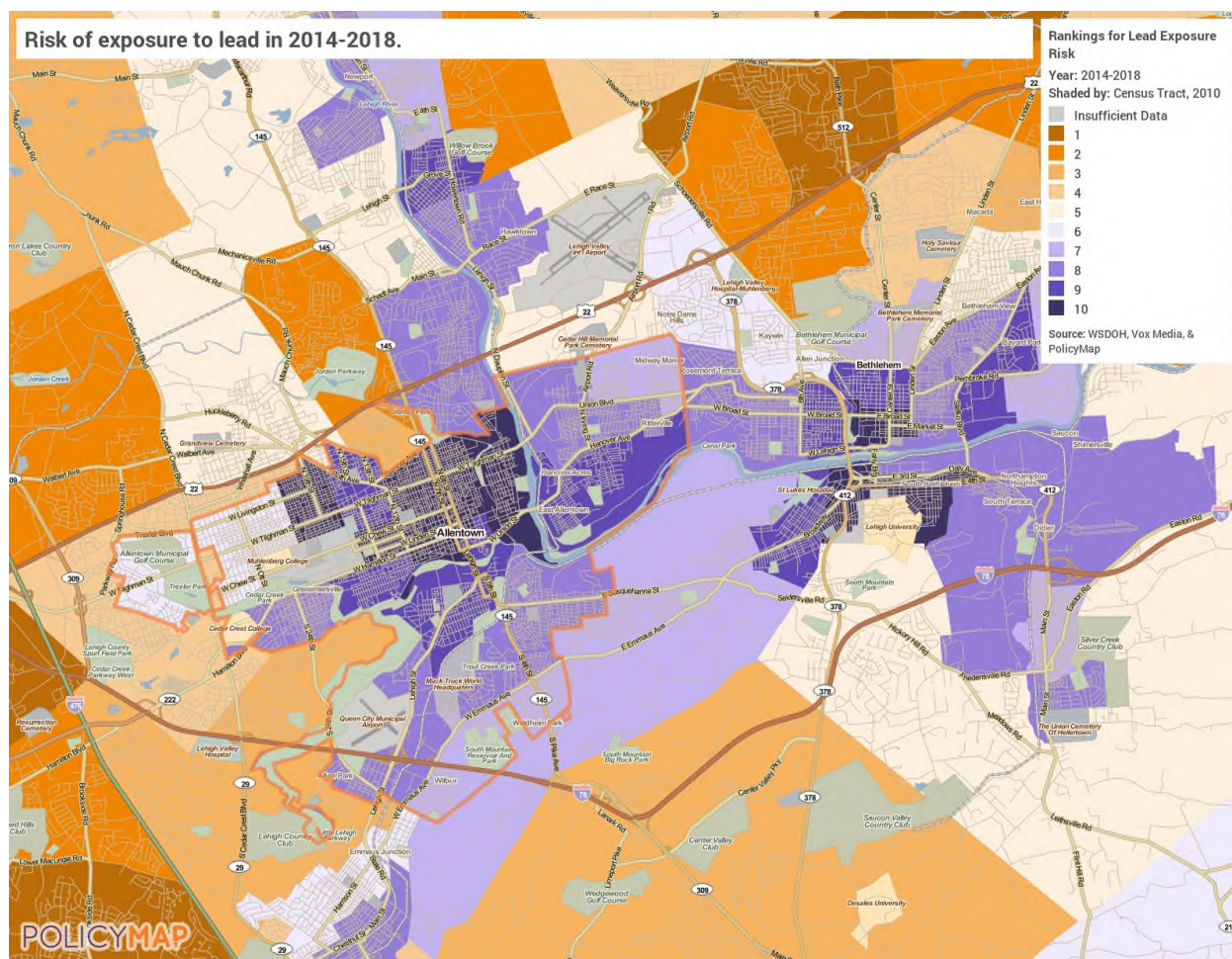
% of Rental Housing Built Before 1980

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	16,705	88%	18,300	82%
Housing Units build before 1980 with children present	1,140	6%	330	1%

Table 37 – Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)



Lead Exposure Risk

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 38 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

Most of the City of Allentown's households, 21,445 units (52%) have none of the four evaluated housing problems; lack of complete kitchen or plumbing facilities, cost burden, overcrowding, or negative income. However, since the age of Allentown's housing is a significant factor (41% of Rental units and

52% of Owner-Occupied Units were built before 1950), it is presumed that many of these owner and renter occupied homes need housing rehabilitation.

Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with LBP Hazards

According to the Risk of Lead Based Paint Assessment chart included above, there are a total of 16,705 owner occupied units that were built prior to 1980 and 18,300 renter occupied units that were built prior to 1980 that may contain lead-based paint.

Children under the age of six typically constitute about 7% of the population in an area. However, according to the Census Data from the 2013-2017 American Community Survey 5-Year Estimate, Allentown's percentage of children under five (Census data is grouped by 5 and under) is approximately 7.6% which is considered above average. Because many areas of the City have very high numbers of pre-1980 housing, especially the Center City area, any area with a high concentration of younger children is a concern for lead-based paint poisoning.

Discussion

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The Allentown Housing Authority (AHA) currently owns and manages 987 conventional public housing units, primarily within 10 separate developments located throughout the City of Allentown. Sixty-five (65%) percent of the units are designated for elderly tenants overall. The overall annual turnover rate is low, approximately 15% of the units, and the occupancy rates range from 98% to 99%. This total includes 79 scattered site units located throughout the City of Allentown.

The AHA has converted 205 conventional public housing units through the HUD Rental Demonstration Program. Seventy (70) units at Cumberland Gardens received Project Based Vouchers and 135 units at Overlook Park receive Project Based Rental Assistance (PBRA).

In addition, AHA owns and manages 95 units that were acquired and rehabilitated through the federal Section 8 Substantial Rehabilitation Program. These units are also scattered throughout the City. The major unmet need in the City of Allentown reported by AHA was for additional family housing units with a varied bedroom mix. Also, adequate on-site facilities for community programs are seen as a great need.

Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	33	1,213	1,403	0	1,403	0	0	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 39 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:**Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:**

HUD has deemed the Allentown Housing Authority as a "Standard Performer" for public housing and as a "High Performer" for HCV programs. The Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) are based on a rating analysis of factors including vacancies, modernization, rent collection, unit turnaround, and condition of units. The Allentown Housing Authority (AHA) currently owns and manages 987 conventional public housing units, primarily within 10 separate developments located throughout the City of Allentown. Almost all of the public housing units are occupied, with yearly turnover ranging from 2 to 23 units among the 10 developments. This total includes 79 scattered site units located throughout the City of Allentown.

The major challenge faced by the AHA is the age of the majority of its buildings. More than 73% of the housing structures were built in the 1960s and 1970s, and the heating systems, distribution systems, and exterior brickwork have suffered.

Additionally, AHA owns and manages 95 units that were acquired and rehabilitated through the federal Section 8 Substantial Rehabilitation Program. Project Based Rental Assistance (PBRA) is used to provide rental assistance to residents and support AHA operation and maintenance of the units. These units are also scattered throughout the City.

AHA reports that as of 2020, the majority of its housing stock is in good condition and meets all HUD standards and City housing codes.

Public Housing Condition

Public Housing Development	Average Inspection Score
700 Building	Good
Central Park	Good
Cumberland Gardens	Good
Gross Towers	Good
Little Lehigh	Poor
NSA	Good
Overlook Park	Good
Scattered Sites	Fair
Towers East	Good
Walnut Manor	Good

Table 40 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Over the past several years, the focus of the AHA has been on making physical upgrades to all its family and elderly public housing developments through the annual Capital Fund grant (approximately \$1.5 million annually). Ongoing repairs and modernization activities include kitchen and bathroom modernizations, new HVAC and water improvements, new sidewalks, curbs, and roofing. Plans are to request funding for elderly services as well as new housing construction funding from the federal government in the future.

A major rehabilitation was initiated in 2012 at the Cumberland Gardens development. Several needs have been identified by the AHA and public housing residents. Safety issues have begun to be addressed by the installation of overhead surveillance cameras at three building sites. City police have been cooperative in their understanding of the increased problems experienced by public housing residents. Another need is more off- street parking in several of the developments, as well as generally reduced density within the public housing neighborhoods.

The rehabilitation included dividing the development into three phases. Phase 1, 74 units; Phase 2, 70 units and Phase 3, 56 units. The AHA and its development partner successfully utilized four and nine percent Low Income Housing Tax Credits, City of Allentown HOME Funds, ARRA Stimulus Funds and LIHTC Equity to renovate all units. A small number of units were demolished and replaced with new units containing handicap accessible units. In addition, the Community Building was renovated.

Five of the seven public housing developments currently have a resident council. The resident councils provide input and are primarily involved in planning for, and feedback on, renovation/modernization needs of the developments. The resident councils attend regular meetings and take part in the planning

processes for both the 5 year and annual Public Housing Authority (PHA) plans that are submitted to HUD.

The AHA recognizes the inherent difficulty in keeping the resident councils engaged. It plans to seek involvement and support of the councils by scheduling regular meetings with the Director of Social Services or AHA Executive Director.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

Strategies for improving living environments for those residing in public housing are described. Additionally, Gross Towers and Towers East currently have a resident council. The resident councils provide input and are primarily involved in planning for, and feedback on, renovation/modernization needs of the developments. The resident councils attend regular meetings and take part in the planning processes for both the 5-year and annual Public Housing Authority (PHA) plans that are submitted to HUD. The AHA recognizes the inherent difficulty in keeping the resident councils engaged. It plans to seek involvement and support of the councils by scheduling regular meetings with the AHA Executive Director. It is anticipated that by employing this strategy, residents will be able to have a direct impact on decisions and projects related to improving their living environments.

Discussion:

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

Homelessness is a complex issue that, in addition to housing cost and availability, often involves problems of addiction, mental health, domestic violence, health, and poverty. New models for addressing homelessness (“Housing First”) have proven that these problems can best be addressed by providing stable, long-term housing and partnering with social service organizations to “wrap” the client with social services and support.

Federal funding that addresses homelessness requires communities and organizations to formally work together to develop a "Continuum of Care" (CoC) process to address homelessness at all levels. Since 2005, the City of Allentown has participated in the regional CoC process, led by the Eastern Pennsylvania CoC and coordinated at a local level by the Lehigh Valley Regional Homeless Advisory Board (RHAB). The Eastern PA CoC is one of two regional CoC's in Pennsylvania that cover non-entitlement portions of the state in order to receive homeless assistance from HUD. Within the region, the Lehigh Valley RHAB encompasses Lehigh and Northampton Counties, the cities of Allentown, Bethlehem and Easton. Each year, the Lehigh Valley RHAB applies for competitive federal grants for the region to provide homeless housing and support services.

The Commonwealth of Pennsylvania Department of Community and Economic Development (DCED) is the Collaborative Applicant for the Eastern PA CoC. The Collaborative Applicant is the eligible applicant (State, unit of local government, private, nonprofit organization, or public housing agency) designated by the CoC to: 1) Collect and submit the required CoC Application information for all projects the CoC has selected for funding, and 2) Apply for CoC planning funds on behalf of the CoC. The Eastern PA CoC (of which LV RHAB is a member) is currently an unincorporated organization that serves as the primary decision-making group for the CoC process. The CoC's responsibilities include ensuring representation of key stakeholders; setting the agenda for full CoC planning meetings; conducting the annual homeless single Point-in-Time count; overseeing the various subcommittees and working groups; completing the annual CoC application; and assisting in reviewing programs, activities, data, and all other efforts that will eliminate homelessness and improve the well-being of homeless persons and families in Eastern Pennsylvania region.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	595	36	368	304	0
Households with Only Adults	299	0	119	333	0
Chronically Homeless Households	101	0	0	101	0
Veterans	182	0	19	120	0
Unaccompanied Youth	77	0	65	0	0

Table 41 - Facilities and Housing Targeted to Homeless Households

Data Source Comments:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**Emergency Support Services**

Several agencies in Lehigh County provide short-term emergency assistance to the homeless and those at risk of becoming homeless. Food baskets and vouchers are supplied by agencies such as the American Red Cross, Catholic Social Services, the Salvation Army and local church organizations.

A variety of Supportive Services are provided by the following agencies in the areas of Alcohol & Drug Abuse (DA), Case Management (CM), Child Care (CC), Education (ED), Emergency Services (ES), Employment (EM), Healthcare (H), HIV/AIDS (HIV), Life Skills (LS), Mental Health Counseling (MHC), Referrals (R) and Transportation (T).

AIDSNET – HIV

ARC of Lehigh & Northampton Counties – EM

Career Link (WIB) – EM

Clubhouse of Lehigh County - MHC

Community Action Committee of Lehigh Valley – CM, LS

Council of Spanish Speaking Organizations of Lehigh Valley – EM

Crisis Intervention Center – MHC, R

Head Start of the Lehigh Valley – ED, CC

Keenan House Treatment Trends - DA

LANTA METRO – T

Lehigh County Conference of Churches – DA, EM, ES, MHC, R, T

Lehigh Valley Center for Independent Living – LS, R

Lehigh Valley Hospital, 17th and Chew Mental Health Clinic - MHC

Step By Step, Inc. – CM, LS, DA, MHC

Salvation Army – CM, LS

Turning Point of Lehigh Valley – CM, LS

United Way of Greater Lehigh Valley – ED, ES

Valley Youth House – CM, LS

Information/Referral and Outreach

The Area Agency on Aging provides a 24-hour response service called the Personal Emergency Response System. This system provides two-way communication equipment for the frail elderly to allow them immediate access to emergency assistance. Additionally, the non-profit organization Turning Point of Lehigh Valley operates a Domestic Abuse Hotline that is likewise available on a 24/7 basis. Valley Youth House provides Street Outreach services, and other emergency situations require the use of the County 911 system.

Homeless Prevention Services

The following agencies also provide Counseling/Advocacy (CA), Legal Assistance (LA), Mortgage Assistance (MA), Rental Assistance (RA), and Utilities Assistance (UA) where needed to prevent homelessness:

- Alliance for Building Communities – CA
- Community Action Committee of the Lehigh Valley – CA
- Lehigh County Assistance Office (Emergency Shelter Allowance) – RA
- Lehigh County Assistance Office (LIHEAP) – UA
- Neighborhood Housing Services of the Lehigh Valley – CA
- North Penn Legal Services – LA

It should be noted that a variety of funding through the Continuum of Care is allocated annually to provide emergency shelter and transitional housing for the homeless.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

In Lehigh County in 2019, 28 people were identified as chronically homeless during the annual Point in Time Count. The City has identified the chronically homeless in Allentown as mainly the childless adult group with serious disabling conditions. Several factors account for the persistence of the problem, including the inherent difficulty of serving this unstable population, many of whom are seriously mentally ill. The lack of low-cost rental housing for single individuals, families and veterans and the lack of intensive support services due to lack of funding are being addressed by the Eastern PA CoC process. Funding emphasis is now on additional permanent housing units.

Rapid Rehousing programs provide rental assistance and security deposits as well as landlord advocacy, assistance with finding affordable housing and case management assistance to families and/or individuals who are homeless with the goal of moving them into permanent housing.

Outreach to connect services to the homeless populations is provided by the Linkage Program of the Lehigh County Conference of Churches and various agencies who reach out to homeless veterans.

The HUD 2019 CoC Housing Inventory provides a summary of facilities available for Emergency Shelter, Transitional Housing, Permanent Supportive Housing, and Rapid Re-Housing units. Per the summary there are a total of 770 Year-Round beds in Lehigh County. Included in these units are the following facilities:

The shelter and transitional housing in Allentown:

Greater Lehigh Valley YMCA - Emergency Shelter
Community Action Committee of the Lehigh Valley - 6th Street Shelter (ES)
Community Action Committee of Lehigh Valley - Turner St. Apartments (TH)
Salvation Army Hospitality House (ES)
Allentown Rescue Mission (ES)
Turning Point of the Lehigh Valley (Domestic Violence) (TH)

The Salvation Army provides emergency shelter and some case management for women and women with children. Although not specifically designated a facility for special needs populations, some persons with special needs may be assisted there. The Sixth Street Shelter provides shelter and services for homeless families, some of whom may have members with special needs. Finally, the Allentown Rescue Mission, also funded with ESG, provides shelter and services for homeless men, some of whom have special needs. The Allentown School District employs a homeless liaison who works with all the shelters and participates in the LVRHAB and works to ensure homeless youth remain in school and receive the assistance they need.

Valley Youth House provides services to homeless unaccompanied youth. The Transitional Living Program (TLP) consists of several residential sites located throughout Lehigh and Northampton Counties. Youth reside in apartments with other youth of like age and experience and are under the supervision of a live-in Resident Advisor. All the sites are located in residential neighborhoods within the community. Valley Youth House has also recently begun a street outreach program for homeless youth in Allentown. This service connects homeless youth to services available to them.

Homeless Veterans are assisted with several agencies that receive SSVF (Supportive Services for Veterans and Families) funding. These agencies include Hope for Veterans and Catholic Charities. These agencies have just recently received funding and are beginning to offer outreach and programs to homeless veterans.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

Certain population groups require supportive services and/or supportive housing, either on a permanent basis, or on a temporary basis. Many special needs populations are very low-income households (below 50% of Median Family Income) because they are not able to work or can only work part-time. Special population groups include the frail elderly, the physically- and developmentally disabled, severely mentally ill persons, persons with HIV/AIDS, and those with substance abuse issues. Many disabled individuals rely on Supplemental Security Income (SSI) for financial support. SSI provides income support to persons 65 years and over, the blind, and the disabled.

Since so many special needs persons have limited incomes, finding affordable and accessible housing is often a serious challenge. Even when new affordable rental housing is developed, the rental rates for the housing units are often too high for many disabled persons.

One common concern among service providers and clients with special needs is that more and larger housing units are needed to accommodate families taking care of the individuals with special needs. They suggest that many families would like to take care of their own family members with special needs, if supportive services, respite for caregivers and appropriate accommodations, such as barrier-free access, could be provided. Especially in the cases of the physically disabled population and the population of persons with AIDS/HIV, much of the supportive housing that is available can only accommodate the individual with special needs, isolating him or her from the supportive environment of a family.

Another concern among clients and advocacy groups is that most housing programs/facilities fail to recognize the persons with special needs often have multiple special needs. For example, a significant percentage of persons with AIDS/HIV also have problems of substance abuse or mental illness. Most residential facilities are often targeted for single specific conditions, such as the mentally ill, the developmentally disabled or substance abusers.

HOPWA Assistance Baseline Table

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	0
PH in facilities	0
STRMU	0
ST or TH facilities	0
PH placement	0

Table 42– HOPWA Assistance Baseline

Data Source Comments:

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Elderly /Frail Elderly: The goal of County Area Agencies on Aging is to enable the elderly to age in place. An array of in-home services is offered to make this possible, including adult day care, in-home health care, personal care and personal emergency response systems. The Family Care Giver Support Program provides reimbursement of out-of-pocket expenses to family members who provide care for aged relatives.

In order to allow the frail elderly to remain in their homes, home modifications are usually required, including grab bars, wheelchair ramps, or accessible doorways. Other service needs include chore services and in-home medical services. Services are provided through the Lehigh County Area Agency on Aging which plans and coordinates the provision of services to the older adults. Currently, Allentown offers a wide range of elderly housing units, provided at eighteen developments.

Persons with Mental Illness: See text box below.

Physically Disabled: For homeowners with physical disabilities, there is a need for home modifications to make the premises accessible. For renters, the most significant need is being able to find affordable and accessible housing. Housing advocates note that the disabled still face problems in requesting reasonable modifications in their rental units, and that many disabled renters need financial assistance to carry out accessibility modifications.

There are specific standards for accessibility that have been integrated into the City's residential owner-occupied housing rehabilitation program. The Federal Fair Housing law requires that new construction or major renovations of buildings with four or more units contain accessible units.

Services are provided to the physically disabled through the PA Department of Public Welfare and locally through the Lehigh Valley Center for Independent Living, which is often supported by the City's CDBG program.

Persons with Substance Abuse: Inpatient services can be accessed at any of sixteen providers serving Allentown in the areas of Adult Detox, Adult Short-Term Rehab, Adult Dual Rehab (D&A, MH), Adult Long-Term Rehab, Adult Halfway House, Women with Children, Adolescent Short-Term and Adolescent Long-Term. Outpatient Services may be obtained through four providers serving Allentown in the areas of Adult Outpatient, Adult Intensive Outpatient, and Adolescent Outpatient.

Persons with HIV/AIDS: The primary provider of housing and services to persons with AIDS is AIDSNET, a private, non-profit organization, which is one of seven federally mandated HIV/AIDS coalitions in Pennsylvania. AIDSNET is responsible for the development of a comprehensive continuum of prevention and care services. The organization's efforts are aimed at both stopping the spread of HIV infection and providing medical and social services to those who have been infected. The AIDSNET case management agency that serves Allentown is the AIDS Activity Office of the Lehigh Valley Hospital.

Victims of Domestic Violence: Domestic Violence services and housing in Allentown are provided by Turning Point of the Lehigh Valley (TPLV). TPLV is a safe place for victims of domestic violence and their children. TPLV's mission is to work toward the elimination of domestic violence, increase community awareness and empower victims by providing shelter and support services.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Lehigh Conference of Churches Daybreak has expanded services provides supportive services to as many as 200 Allentown Center City initiatives residents, access to information and referral, community engagement, access to technology. Lehigh Valley Center for Independent Living (LVCIL) Place program provides housing counseling services to city residents with any disability and their family members.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Elderly/Frail Elderly:

Continue to support activities that provide affordable housing for elderly and frail elderly residents at or below 80% of area median income; and

Continue to support activities that provide the elderly and frail elderly with benefits counseling, care coordination, transportation and other services.

Mental Illness:

Continue to offer support and assistance to local agencies that provide supportive services and outreach programs to individuals with mental illness; and

Increase the supply of transitional and permanent supportive housing facilities for persons with mental illness and mental disabilities, on a regional basis. Such facilities should provide case management services to residents.

Physically Disabled:

Provide assistance to disabled individuals to rehabilitate housing units for accessibility; and
Continue to support activities that serve persons with disabilities.

Substance Abusers:

Continue to offer support to local agencies that provide outreach programs to individuals with drug and alcohol problems; and
Increase the supply of transitional and permanent supportive housing for individuals with drug and alcohol addiction.

Persons with HIV/AIDS:

Continue to support efforts that provide affordable housing to people living with HIV/AIDS; and
Continue to support organizations that provide supportive services to people living with HIV/AIDS.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

Not applicable.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Affordability is closely linked to the number of available housing units or the supply of housing relative to housing demand in a market. Unlike its more suburban and rural neighbors, Allentown neighborhood patterns have been set for decades and the city does not have much undeveloped land. However, Allentown does have key parcels available for redevelopment, such as the State Hospital site, riverfront redevelopment, and redevelopment of underutilized areas such as vacant retail sites and former industrial sites.

The character and fabric of the different neighborhoods of Allentown are a major asset that adds to the authenticity and quality of life. Zoning updates should make it easier to preserve that character while also adding in appropriate density. Allentown's Zoning Ordinance currently has eight different classifications of residential. Given the large variety of homes in the city, it seems that the original authors tried to create specific conditions to allow for neighborhoods to retain their identity. With this in mind, a new Zoning Code could more efficiently retain this character, while allowing for change and adaptation.

Currently, residential zones have minimum lot widths. Many of these lot widths do not correspond with the actual lot sizes. If home prices in Allentown increase, this can encourage consolidation of lots, in order to build larger homes, which impacts neighborhood character and decreases the availability of smaller, more affordable homes. A new ordinance could include the provision that existing lot widths within each zone are suitable.

Residential zones should also align with the type of housing that exists in each zone. For example, in the Low-Density Residential categorization, twin dwellings are not permitted, but there are a number of these structures in Hamilton Park, which is an R-L zone.

Where accessory dwelling units are permitted, it is worth considering whether front, back, and side setbacks allow for units to be built that meet the requirements for habitation.

Like most other towns in the United States, Allentown utilizes the International Building Code (IBC) to govern construction of buildings. These building codes address public health and safety with measures peer-reviewed by the ICBO and the International Codes Council and are based in building science. The IBC offers guidance as to where a building should be placed on a lot, and the amount of square footage a building should contain. This guidance could be used in place of existing zoning and would simplify the building process.

Regional Analysis of Impediments to Fair Housing Choice

In 2019, Northampton County, and the cities of Allentown, Bethlehem, and Easton agreed to prepare a joint Regional Analysis of Impediments to Fair Housing Choice. This Regional AI is an endeavor to streamline the Lehigh Valley region's approach to fair housing and to identify and address impediments to fair housing choice that often do not strictly follow jurisdictional boundaries. By conducting this

regional analysis, communities across the Lehigh Valley will be able to promote fair housing choices for all persons, provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities.

As of the submission date of this Consolidated Plan, the Regional Analysis of Impediments to Fair Housing Choice had not yet been finished. Once it has been reviewed and approved, this Plan will be amended to include the findings and recommendations of the Regional AI.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

Ninety percent of employed people in Allentown leave the city for work daily. This employment pattern contributes to traffic congestion and longer commute times and transportation costs for these Allentown residents. According to the 2013-2017 American Community Survey 5-Year Estimate, jobs in the following sectors located outside of the city do not pay a living wage: Administration & Support (\$20,203); Accommodations & Food Services (\$20,086); and Retail Trade (\$17,871). A Living Wage is \$20,780. One way to balance the uneven job distribution pattern is to encourage more jobs in the City of Allentown that are available to the people who do not have more than a high school degree.

Generally, there should be a push for more jobs to be brought to Allentown, for those with and without post- high school degrees. Higher-paying jobs will ensure that workers will be able to afford to purchase or renovate existing housing stock or rent newly built multi-family units. Workers without a post-high school degree can access these jobs through accessing job training programs. Another path to higher wages is to support manufacturing in the City of Allentown, as wages in manufacturing are higher than other jobs attainable without a post-high school degree.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	167	3	0	0	0
Arts, Entertainment, Accommodations	5,387	3,931	14	11	-3
Construction	1,334	1,478	3	4	1
Education and Health Care Services	9,283	11,592	23	33	10
Finance, Insurance, and Real Estate	2,038	1,881	5	5	0
Information	695	859	2	2	0
Manufacturing	5,333	2,543	13	7	-6
Other Services	1,470	1,949	4	6	2
Professional, Scientific, Management Services	2,898	4,285	7	12	5

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Public Administration	0	0	0	0	0
Retail Trade	5,241	4,465	13	13	0
Transportation and Warehousing	4,004	760	10	2	-8
Wholesale Trade	1,885	1,437	5	4	-1
Total	39,735	35,183	--	--	--

Table 43 - Business Activity

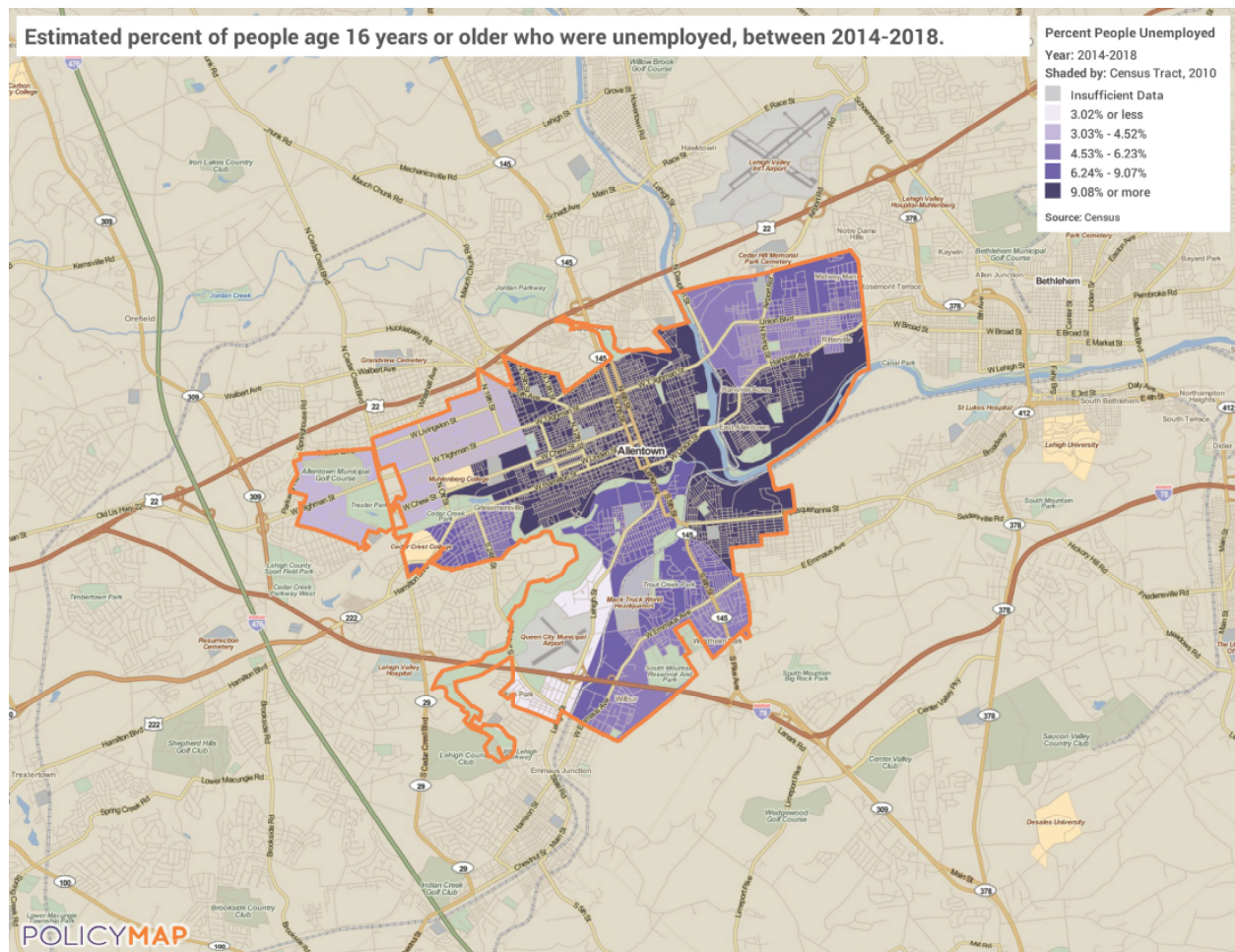
Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	57,375
Civilian Employed Population 16 years and over	49,345
Unemployment Rate	13.99
Unemployment Rate for Ages 16-24	37.70
Unemployment Rate for Ages 25-65	8.14

Table 44 - Labor Force

Data Source: 2011-2015 ACS



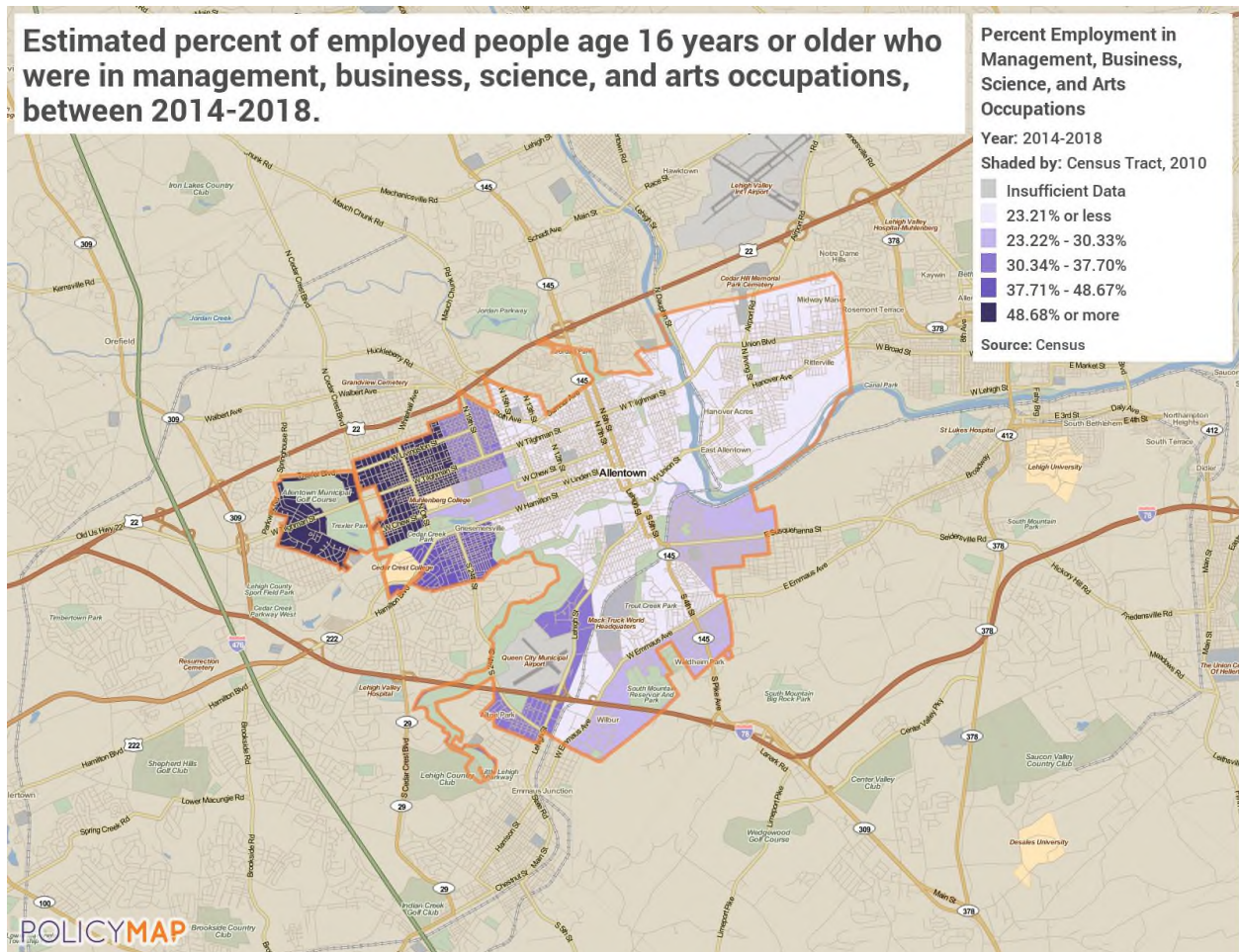
Unemployment Rate

Occupations by Sector	Number of People
Management, business and financial	6,195
Farming, fisheries and forestry occupations	2,950
Service	6,795

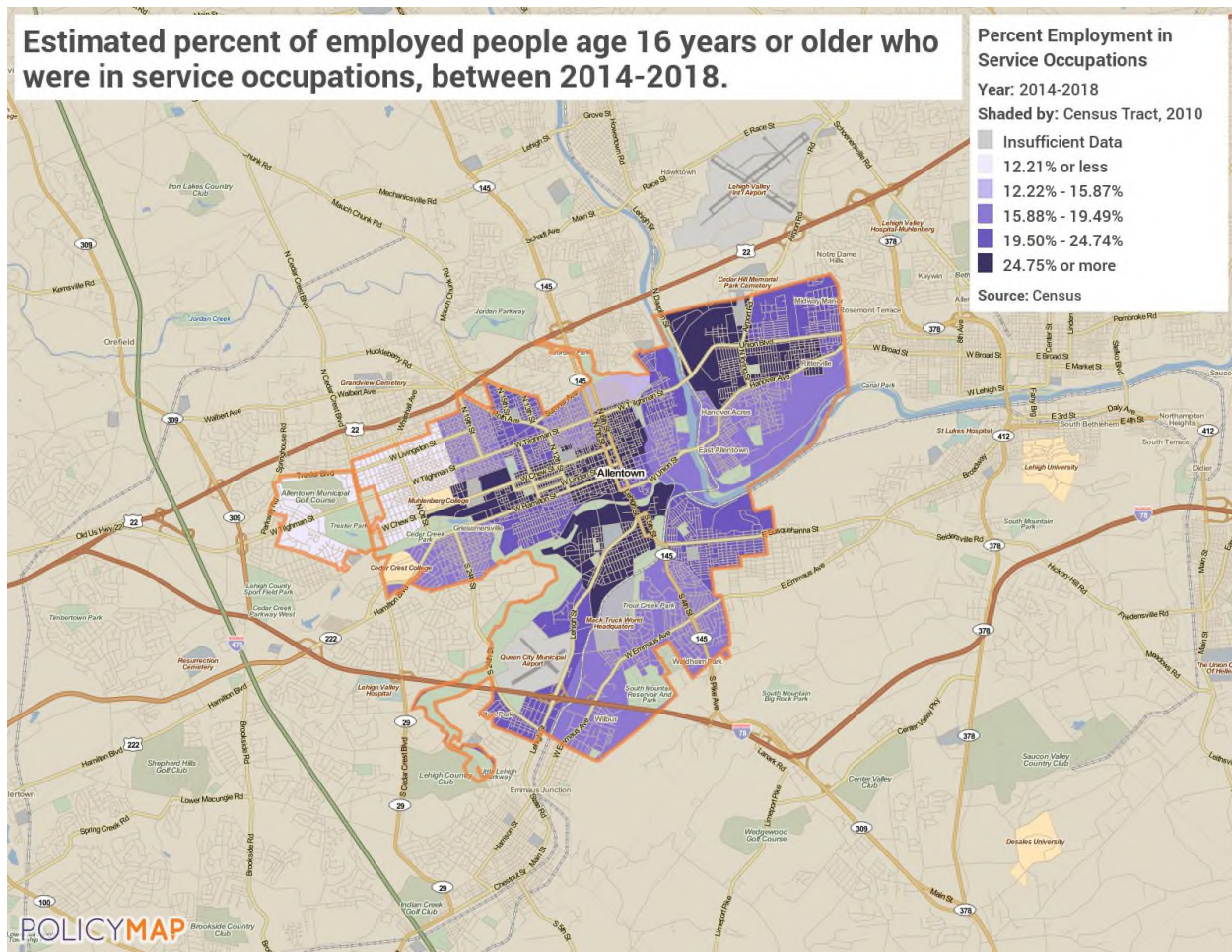
Occupations by Sector	Number of People
Sales and office	12,555
Construction, extraction, maintenance and repair	3,225
Production, transportation and material moving	4,710

Table 45 – Occupations by Sector

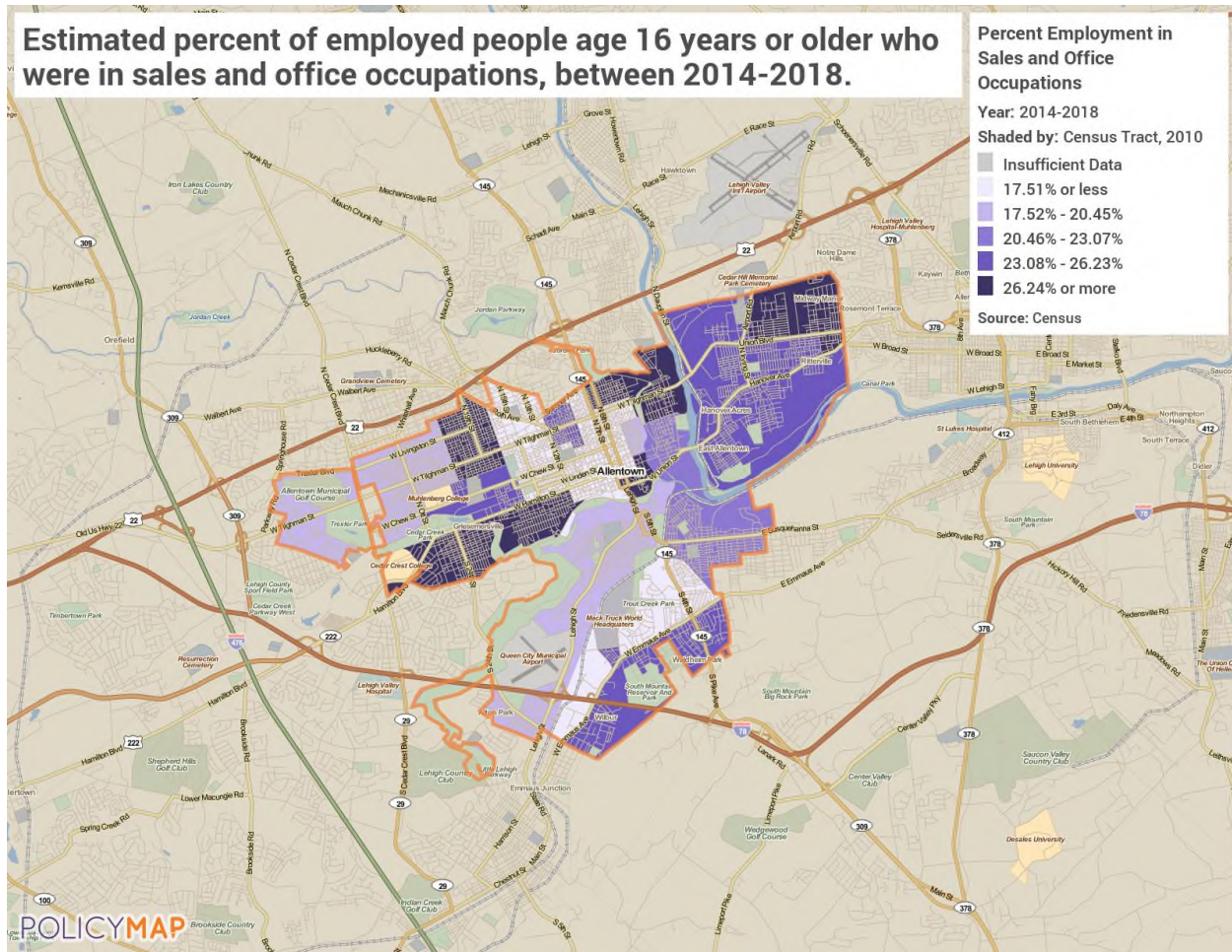
Data Source: 2011-2015 ACS



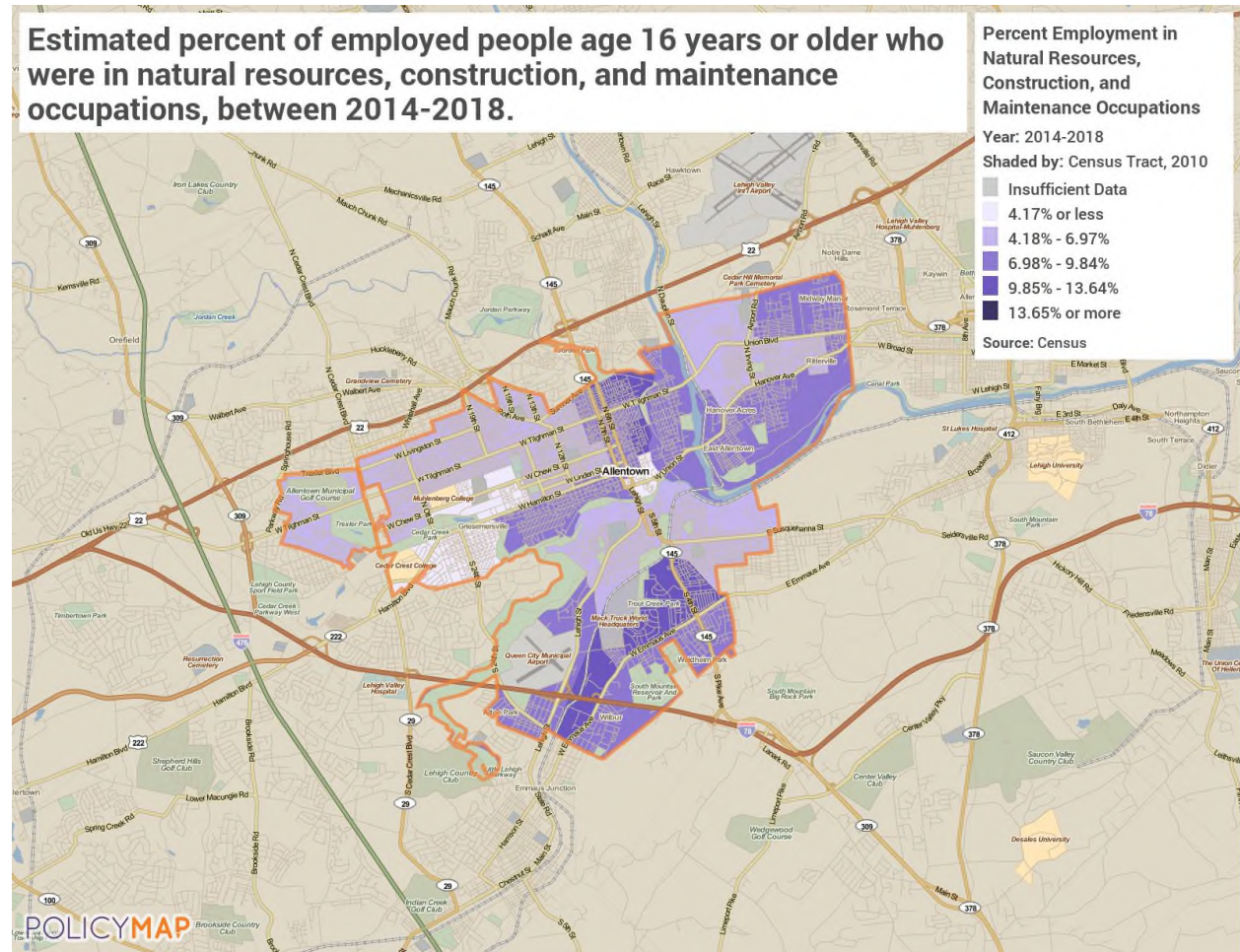
Employed in Management, Business, Science & Arts



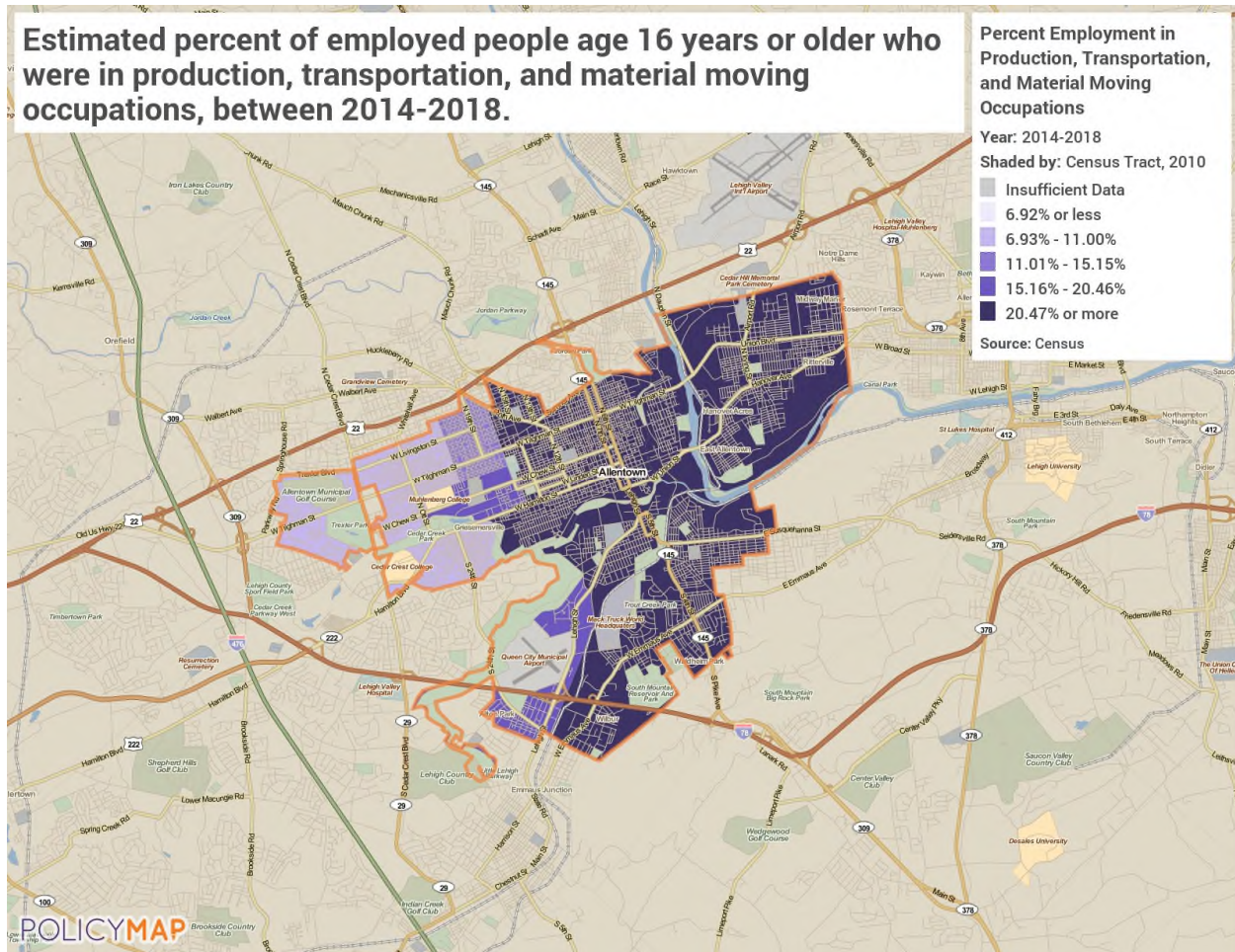
Employed in Service



Employed in Sales & Office



Employed in Natural Resources, Construction & Maintenance



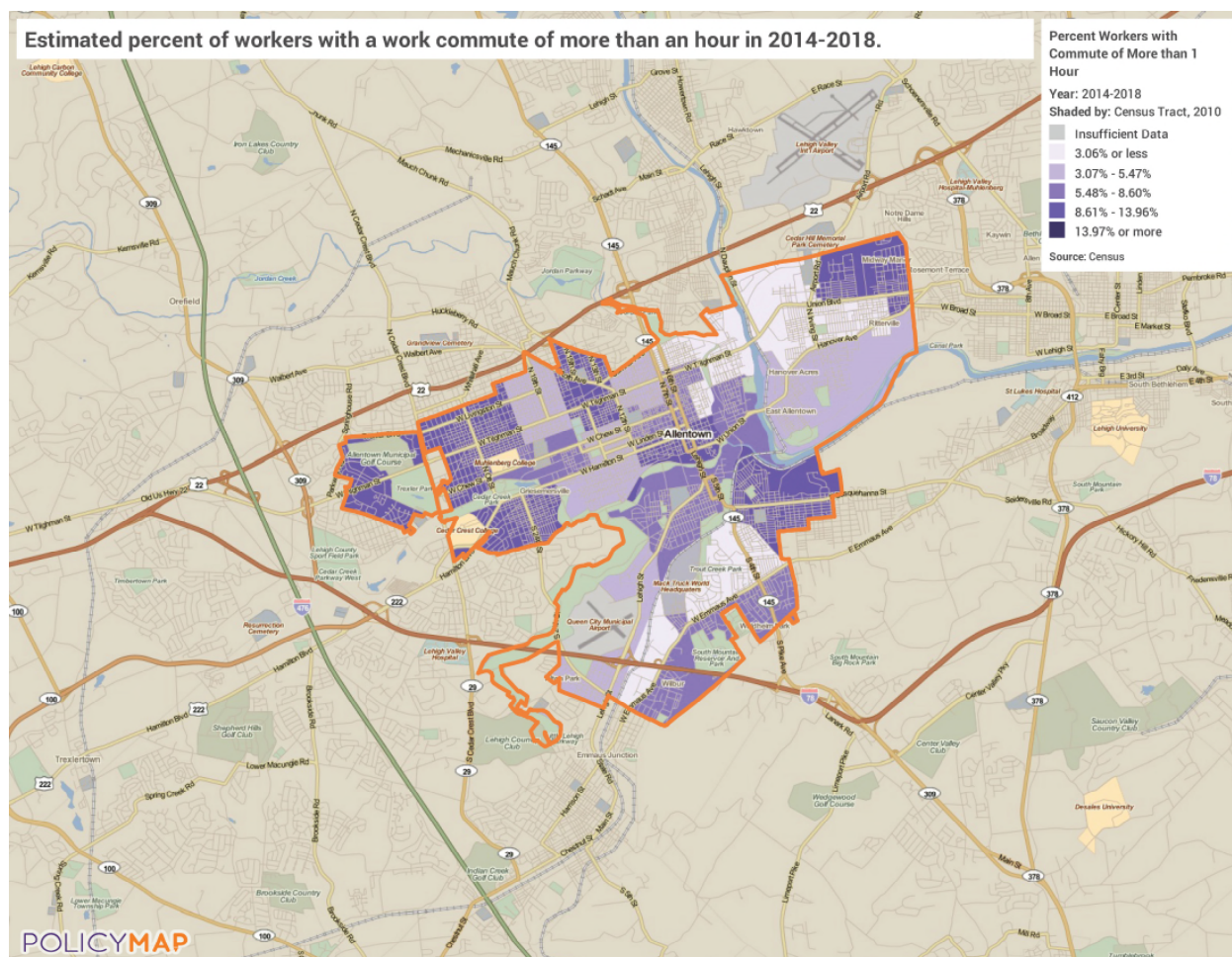
Employed in Production, Transportation and Material Moving

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	33,140	72%
30-59 Minutes	9,320	20%
60 or More Minutes	3,505	8%
Total	45,965	100%

Table 46 - Travel Time

Data Source: 2011-2015 ACS



% of Employed with +1 Hour Commute

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	6,345	1,145	4,840
High school graduate (includes equivalency)	12,955	1,850	5,540
Some college or Associate's degree	11,745	1,380	3,885
Bachelor's degree or higher	7,725	450	1,390

Table 47 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	220	540	1,220	2,050	2,340
9th to 12th grade, no diploma	2,540	2,900	2,095	3,525	1,970
High school graduate, GED, or alternative	4,815	5,765	5,415	9,170	5,680
Some college, no degree	6,275	3,640	3,115	4,900	1,715
Associate's degree	350	1,855	1,040	2,480	505
Bachelor's degree	590	2,345	1,615	2,715	955
Graduate or professional degree	10	605	710	1,580	820

Table 48 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	19,817
High school graduate (includes equivalency)	24,548
Some college or Associate's degree	28,195
Bachelor's degree	36,100
Graduate or professional degree	53,887

Table 49 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The major employment sectors are: Education and Health Care Services (20%); Arts, Entertainment, Accommodations (12%); Manufacturing (12%); and Retail Trade (11%).

Describe the workforce and infrastructure needs of the business community:

Allentown, Pennsylvania is a quintessential northeastern industrial community that is emerging rapidly from its historic manufacturing roots and charting a new course for development and redevelopment. According to the US Bureau of Labor Statistics from July 2019, the City of Allentown, the Allentown-Bethlehem-Easton region and the Commonwealth of Pennsylvania all share the same rate of unemployment at 3.9%. It should be noted that the July 2019 unemployment rate of 3.9% is significantly less than the data provided by HUD from the 2011-2015 ACS shown in Table 16, above.

The City is working to invest in development and redevelopment in its downtown, neighborhoods and Lehigh River Waterfront as the focal points for expanding business, industry, recreation and new workforce development opportunities. According to the 2013-2017 American Community Survey 5-Year Estimate, the City's economic base generating approximately 50,000 jobs is dominated by four industrial sectors: manufacturing, retail trade, educational services, and health care and social assistance, and professional, scientific, and management, and administrative and waste management services. Combined these sectors represent 71% of all jobs in the City.

According to the Lehigh Valley Workforce Investment Board's Local Plan (2017-2019) the five targeted industry sectors poised for job growth in the Valley include Administrative and Support (17.2%); Health Care and Social Assistance (16.1%); Retail Trade (13.5%); Construction (12.1%); Professional, Scientific and Technical Services (10.8%); and Transportation and Warehousing (10.7%). These sectors reflect many of the strengths of the City's current industrial base and the composition of its resident workforce.

Despite these strengths and opportunities for new investment, there remains a significant segment of the City's population in need of training. 23.4% of City residents live below the poverty line (2013-17 ACS.) In cooperation with its partners at the LVWIB, area colleges and universities (Cedar Crest, Muhlenberg, Lehigh) and area employers, the City is working to reach these distressed workers as part of a comprehensive approach to neighborhood revitalization and community engagement. As the City's economy continues to evolve, there will be an ongoing need for a wide-ranging business development and workforce training program that addresses the current needs of area employers as well as the basic skills and entry level opportunities available for underserved populations.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The Allentown Neighborhood Improvement Zone has generated \$689 million in total investments, development, and revitalization in Center City. New multi-family housing units, while not directly through the NIZ tax credits, have been constructed to provide more downtown housing options targeted at employees in the new office and commercial developments in the NIZ. Additionally, new employers such as ADP have located in the area and invested in new real estate.

Ongoing development in the NIZ will improve the tax base and bring more businesses and people into Allentown. These developments will also prove the case for investment in the city, which will spur development in other corridors.

Opportunity Zones are a federal program signed into law in the 2017 Tax Act. Opportunity Zones are designed to funnel capital gains into designated low-income census tracts. Investors in these

Opportunity Zones receive the benefit of not paying capital gains tax for up to ten years, and of not paying capital gains taxes on additional value accrued during that time. Investors, through Qualified Opportunity Funds, are able to invest in real estate or businesses. It should be noted that Opportunity Fund Investors are not required to consult the community or the municipality before beginning any development process; Opportunity Zones are only regulated at the federal level, and investors will be primarily motivated by seeking a large return and an investment that satisfies the regulations to decrease their taxes.

Allentown has five Qualified Opportunity Zones. They include the downtown business district as well as two large, heavily industrialized tracts in South Allentown. The Center City NIZ is wholly within a federally designated Opportunity Zone and includes several properties eligible for development. The industrial sites, including the former Mack Truck headquarters, and the South Allentown Census Tracts offer an opportunity for development in industrial space that is close to both the city and Interstate 78.

Opportunity Zones are invested in by Opportunity Funds, which are run by investors, banks, and special interest firms. Targeting this wide-ranging group requires a combination of collaborative strategic planning, marketing, and policy alignment. Many communities are attempting to influence development in Opportunity Zones by creating an Investment Prospectus to highlight projects that would best serve the surrounding neighborhood. Projects could include affordable housing, or needed retail, such as a grocery store. Community engagement is important in forming this list of projects, and local government involvement is also needed to determine what financial incentives or infrastructure improvements are needed to improve the value proposition for investors.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Many low skill jobs are located outside of the City, which creates transportation gaps and problems between employees and employers. According to the 2013-17 American Community Survey, 21.7% of City residents age 25 or older do not have a high school degree. This points to the demand for remedial training and retraining programs currently offered by the LVWIB, the community college, and other institutions. There are job opportunities in the local economy for people with basic skills. Healthcare, education and other service sectors also provide many opportunities for retraining individuals for jobs that require a modest level of specialized education. The construction, logistics, and manufacturing industries also offer opportunities for placing unemployed and underemployed residents who have received training in basic and customized skills programs.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

As noted, through the WIB and area educational institutions, the City is working to reach the unemployed and underemployed residents of the community with basic skills, language skills, and various job training programs that enhance workforce readiness in the most distressed neighborhoods. The Lehigh Carbon Community College maintains a campus downtown on Hamilton Street and also offers specialized training in aviation and aeronautics at its campus at Lehigh Valley International Airport. The Hamilton Street campus is particularly accessible to residents from the City's distressed neighborhoods and provides a good vehicle through which many of the partnerships, training, and employment initiatives documented in the Consolidated Plan can be addressed.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The City is actively putting together a plan and a committee has been formed setting the proper benchmarks and goals regarding the plan.

Discussion

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

The City of Allentown Percent of Households with Severe Cost Burden map and the Percent of Low Households and Extremely Low Households with 4 Housing Problems maps show the distribution of low-income households (household income under 50% of Area Median Income) with a severe housing cost burden (paying more than 50% of household income for housing costs) and for households with 4 Housing Problems. For the purposes of this question, we are defining concentration as an area where more than 30% of the population is low-income households with a severe housing cost burden.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

According to the 2013-2017 American Community Survey data, 59.2% of Allentown's population is White, 14.1% is Black/African American, 2.1% is Asian, 19.5% is "Some Other Race" and 50.6% is Hispanic or Latino. The maps at the end of this section show the distribution of the City's "minority" population. For the purposes of this question, we are defining "concentration" as an area where more than 75% of the populations are non-white or Hispanic. With regard to low-income, we consider an area where more than 40% of the population has incomes below the poverty line to be areas with a concentration of low-income persons. The following City of Allentown Poverty Rate map shows the distribution of persons living in poverty.

What are the characteristics of the market in these areas/neighborhoods?

These neighborhoods are located in the Center City area of the City (see attached map in the Grantee Unique Appendices) and are characterized by some of the oldest and densest housing stock in the City; are home to the poorest population in the Lehigh Valley and have their share of drug related crime and lack some of the amenities that more successful neighborhoods enjoy. The neighborhoods have a lack of shopping opportunities, depressed housing values, a larger percentage of rental housing, housing needing rehabilitation, few job opportunities and households with lower incomes.

Are there any community assets in these areas/neighborhoods?

The above listed issues are somewhat offset by the area's attributes which include the uniqueness of the building stock found in its two historic districts; a burgeoning neighborhood commercial district along 7th Street; long standing health care and educational institutions; community groups dedicated to neighborhood improvement and the energy and entrepreneurial spirit typically found in ethnically diverse communities. "Potential" and "opportunity" are words that can also be used to describe the area. Vibrant downtowns that are walkable, diverse and culturally fulfilling are attracting a younger

demographic looking for these attributes. With the support of the downtown corporate and business community, they also now have a partner willing to support the area's revitalization.

Are there other strategic opportunities in any of these areas?

There are currently no other strategic opportunities in any of these areas.

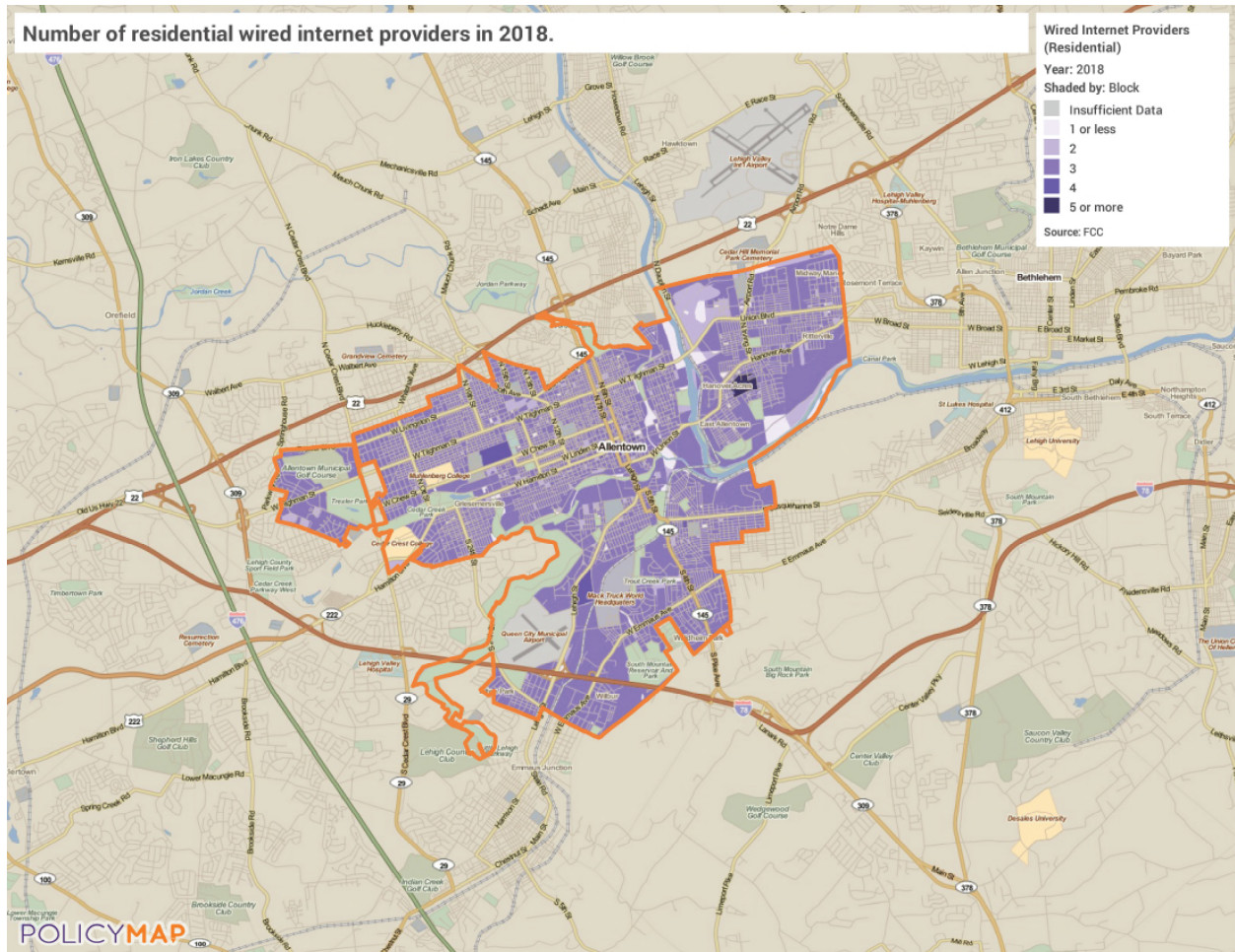
MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

According to 2018 data provided by the FCC, all residents of the City of Allentown have broadband available to them.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The City of Allentown has three (3) internet providers offering broadband speeds of 25Mbps upload and 3Mbps download. At the next tier (100/10), 92% of residents have access to three (3) internet providers. A chart detailing availability by speed is included in this section.



Broadband Service Providers

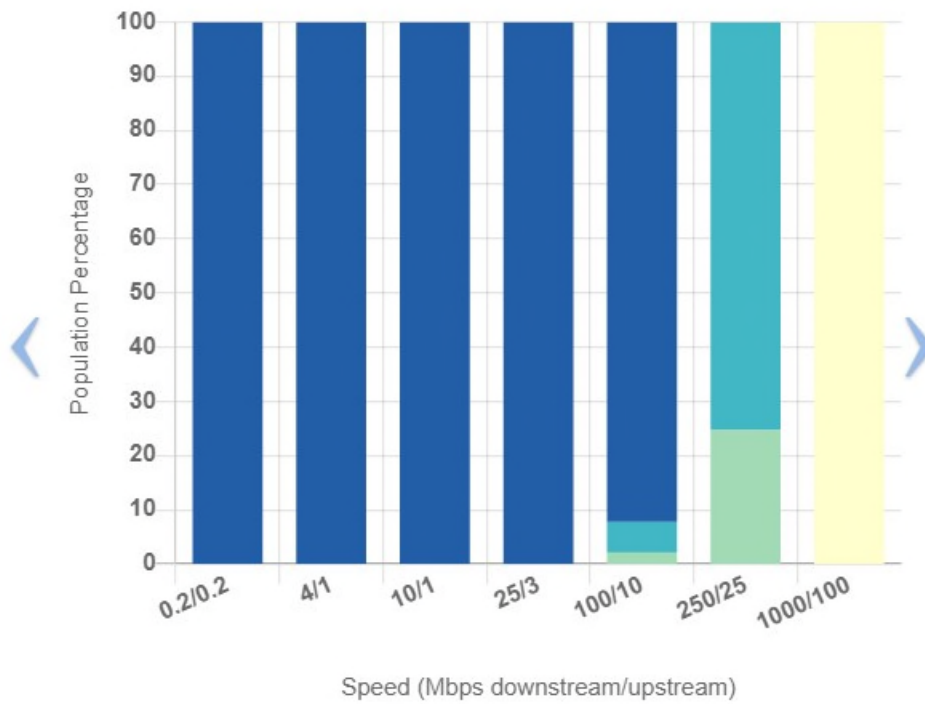
Allentown, PA



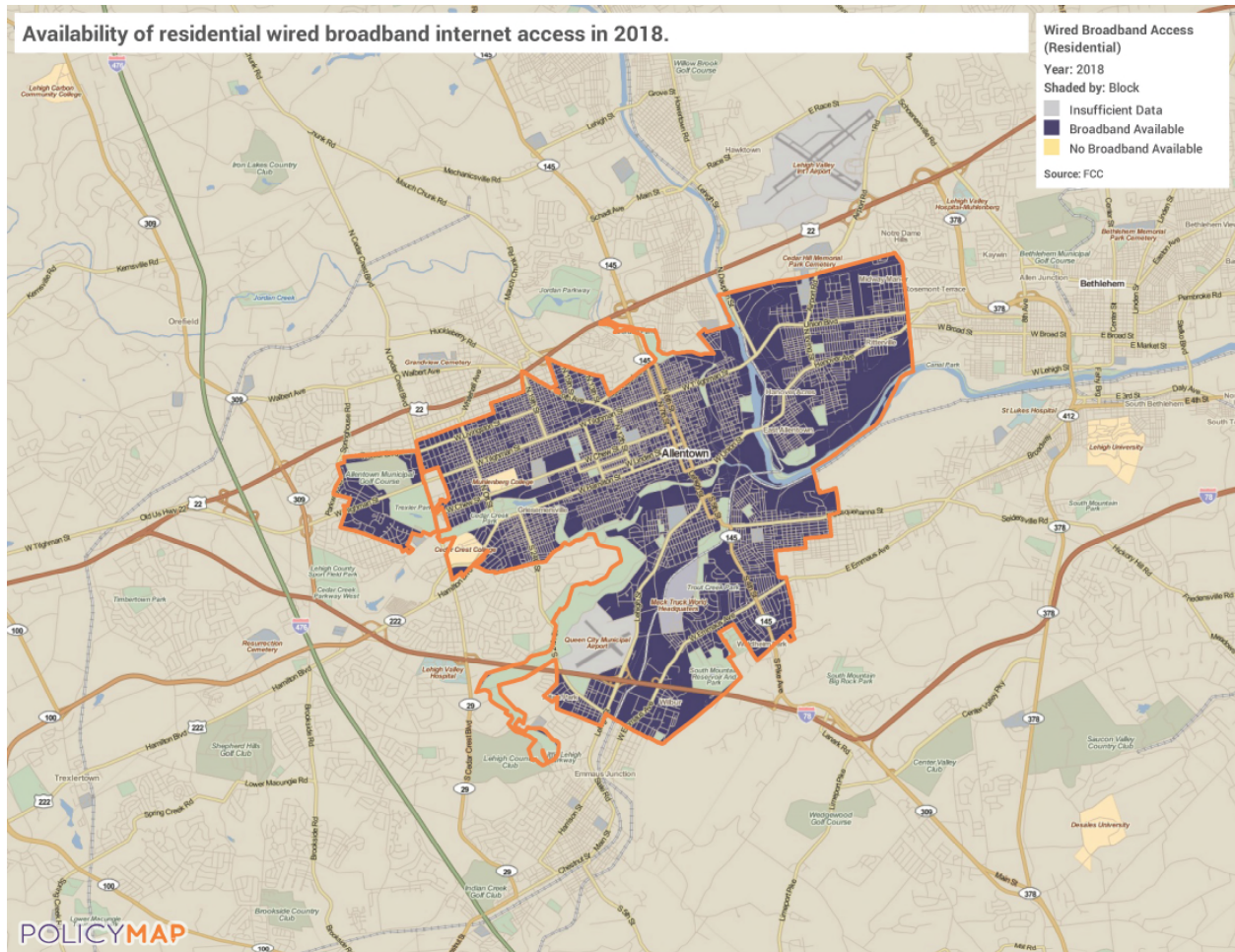
Number of Fixed Residential Broadband Providers



Broadband

**Technology** ADSL, Cable, Fiber, Fixed Wireless, Satellite, Other**Speed** $\geq 25/3$ Mbps**Date** Dec. 2018 (*latest public release*)

Broadband Providers By Speed



Availability of Residential Broadband

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

The Lehigh Valley is vulnerable to a variety of natural hazards such as flooding, tornadoes and sinkholes, and a growing number of man-made hazards that include hazardous materials, traffic accidents and building collapse. Hazard Mitigation planning can lessen the impact of such events by using a proactive approach of assessing the risk and then identifying actions to create safe, more disaster-resilient communities. As a growing city and economic center, Allentown needs to evaluate the ability of its systems and services to respond to shocks, such as flooding or a major storm event, as well as ongoing stressors such as an aging housing stock and economic inequality. Allentown will work together with regional partners such as the Lehigh Valley Planning Commission and city partners such as the Environmental Advisory Council to understand how we can plan for and implement actions to support a greener, more sustainable future. Allentown can reinvent itself as a model small city with regard to sustainability and resilience.

Many major cities have created resilience plans to understand the shocks and stressors that may affect their communities and what preparations they need to take to avert economic, social, or ecological harm to their cities. While some resilience plans resemble climate action planning, there are distinct differences between the two. A resilience plan for Allentown could begin with the Lehigh Valley Hazard Mitigation Plan (2018) to understand the type and likelihood of natural and man-made disasters such as chemical spills, nuclear accidents, floods, tornadoes, or other weather-related events. The Hazard Mitigation Plan generally assumed that these occur over a short duration, thus becoming shocks to the system. The plan outlines the nature of the threat and possible regional response protocol. Additionally, the City of Allentown has over 130 active members of the Allentown Volunteer Medical Reserve Corps – members are trained, credentialed and available to assist first responders and community members during emergencies and disasters. The Resilience Plan should also address longer-term issues that qualify as stressors, such as poor air quality or economic disparity and poverty. Stressors can be more difficult to identify and may be harder to rally resources to resolve them. The Rockefeller Foundation's 100 Resilient Cities Initiative has many resources, case studies, and plans that can be used as a model for a City of Allentown resilience planning approach.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

The Lehigh Valley Hazard Mitigation Plan (2018) identified several potentially hazardous flood areas throughout the City of Allentown that threaten residents from all income categories. The Allentown Vision 2030 Plan recommends developing a City-wide resilience plan based on the findings of the LVHMP.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

This section contains the Strategic Plan for Housing and Community Development that will guide the City of Allentown's allocation of Community Development Block Grant, Emergency Solutions Grant and HOME Investment Partnership Program funding during the 2020-2024 planning period. The City's goals for this period is to focus on a number of identified priority needs and targeted available resources toward several specific goals that are designed to address those needs. These needs include housing assistance for low income persons, homeless and special needs persons, public improvements and facilities for low- and moderate-income persons.

These goals primarily focus on helping residents maintain and improve their quality of life in the City. To this end, Allentown will continue to build on successful projects and programs that meet the needs of low- and moderate-income residents. Projects selected for funding in the five-year period will be limited to those that address the wide range of issues that exist in the City.

SP-10 Geographic Priorities – 91.215 (a)(1)**Geographic Area****Table 50 - Geographic Priority Areas****General Allocation Priorities**

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City of Allentown is not allocating investments geographically in this Consolidated Plan.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 51 – Priority Needs Summary

1	Priority Need Name	Create and Preserve Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Persons with Physical Disabilities
	Geographic Areas Affected	City-wide
	Associated Goals	New Affordable Ownership Housing New Affordable Rental Housing Homeless Support Activities Rehabilitation of Owner-Occupied Homes

	Description	<ol style="list-style-type: none"> 1. IMPROVE THE QUALITY OF ALLENTOWN HOUSING: Healthy, quality housing that is free from physical hazards promotes quality of life and community well-being. Homeowners and landlords both have responsibilities and opportunities to create well-built homes, whether new or renovated, that are more resilient, attractive, and equitable. The city and its partners can help ensure that all residents live in quality housing with code enforcement, education, and assistance programs. 2. INCREASE THE QUANTITY OF HEALTHY, SAFE, AND AFFORDABLE HOUSING: In addition to the demand for market-rate housing, the City of Allentown and the Lehigh Valley needs more healthy and safe housing that is affordable for those making at or below the area's average median income. Affordable housing is more difficult to build than market-rate housing and often has to have some subsidy to make up the gap between the cost of construction and the revenue generated by renting or selling the units. Coordinated action between the city and its partners can make it easier to build more affordable housing through programs, incentives, and funding opportunities. 3. EXPAND PATHWAYS TO HOMEOWNERSHIP: In an era where investors may be located anywhere around the world, cities are finding that property owners who reside locally are more likely to be engaged with neighborhood revitalization efforts and to be part of the community network. Local ownership, whether owner-occupied or rental, is an indication of community-scale investment. Encouraging homeownership can provide stability and economic security to individuals and families. Engaged ownership also reinforces commitment to place and sense of community. 4. PRESERVE ALLENTOWN'S HISTORIC LEGACY HOUSING: Allentown's diverse historic housing contributes to the city's unique character. Landmark structures, historic streetscapes, and charming districts of housing and small commercial tell the story of Allentown's creation. With sensitive zoning, programs, and key projects, Allentown can preserve and protects its assets to ensure that the legacy remains.
	Basis for Relative Priority	As evidenced by the Needs Assessment and Market Analysis section, Affordable Housing remains a top priority for the City of Allentown. The activities of this priority were derived from the City of Allentown's Vision 2030 Comprehensive Plan. Community input began in late 2018 for the Plan and continued through mid-2019 culminating with an initial draft in September 2019.
2	Priority Need Name	Build a Strong, Resilient and Diversified Economy

	Priority Level	High
	Population	Extremely Low Low Moderate Middle Other
	Geographic Areas Affected	City-wide
	Associated Goals	Economic Development/Job Creation Public Safety Goals

Description	<p>Examples of activities that support this Priority are as follows:</p> <p>INCREASE LOCAL EMPLOYMENT: To support economic growth citywide, bringing new jobs and identifying industry growth areas is very important. A significant portion of new jobs should be accessible to Allentown residents that currently work outside of city limits. Ideally, these jobs should pay livable wages, and be accessible to existing populations with minimal training. Jobs in healthcare and manufacturing are likely to be most suitable.</p> <p>INCREASE ACCESS TO TRAINING AND SKILL BUILDING: An important factor in attracting potential and existing employers is a highly skilled labor force. Allentown will ensure its residents are aware of educational resources and get the right skills training to take advantage of high-wage job opportunities.</p> <p>FOSTER SMALL BUSINESS GROWTH AND ENTREPRENEURSHIP: Entrepreneurs and small businesses play a fundamental role in local communities and their economies. Allentown will increase its competitiveness, diversify and stabilize its economic base, and accelerate growth by supporting its small businesses and cultivating an ecosystem of resources for entrepreneurs.</p> <p>ENHANCE LAND VALUE: Strengthening the city's tax base is essential to provide necessary social services and public goods, such as health, public safety, and educational services. To achieve an increase in local employment, Allentown will explore innovative approaches and utilize existing tools and resources that support the continued expansion of businesses and achieve an increase in local employment.</p> <p>CONNECT TO REGIONAL MARKETS: Allentown has an economic advantage in having key tourism destination markets within 200 miles of city limits. The city will strengthen and enhance local tourism to attract tourists and investors from these markets. Doing so will also support local entrepreneurs in their ability to expand their consumer base.</p> <p>ENCOURAGE THE DEVELOPMENT AND SUPPORT OF NEIGHBORHOOD BUSINESSES: Entrepreneurship can flourish in neighborhood commercial districts and provide jobs to local community members. Ease of access to services and amenities builds neighborhood economic strength and a sense of community. When services are within walking, biking or transit distance, it cuts down on the amount of time spent in cars. Increasing services like health clinics, libraries, and recreation also make it easier for everyone to have access, which improves health and quality of life. Furthermore, it makes educational opportunities accessible to a larger population.</p>
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	Basis for Relative Priority	<p>Over eighty percent of employed people in Allentown leave the city for work on a daily basis. This employment pattern contributes to traffic congestion and longer commute times and transportation costs for these Allentown residents.</p> <p>Additionally, Allentown Vision 2030 baseline research has found that often jobs outside of the city do not pay a living wage. One way to balance the uneven job distribution pattern is to encourage more jobs in the City of Allentown that are available to the people who do not have more than a high school degree.</p> <p>Increasing jobs and wages in Allentown will have many favorable impacts. Higher paying jobs provide disposable income, which can support small businesses and cultural assets. Furthermore, the combination of residential development and job development will attract some of the 80% of workers that travel to Allentown on a daily basis to move to the city.</p>
3	Priority Need Name	Reduce Homelessness
	Priority Level	High
	Population	<p>Extremely Low</p> <p>Chronic Homelessness</p> <p>Individuals</p> <p>Families with Children</p> <p>Mentally Ill</p> <p>Chronic Substance Abuse</p> <p>veterans</p> <p>Persons with HIV/AIDS</p> <p>Victims of Domestic Violence</p> <p>Unaccompanied Youth</p>
	Geographic Areas Affected	City-wide
	Associated Goals	Homeless Support Activities

	Description	<p>Addressing the root causes of homelessness goes beyond the need to build more housing and should include issues such as stagnant wages and the lack of adequate mental healthcare in the United States. Increasing access to training and transportation can provide some solution to the former issue, and for the latter, public health services exist. But the most concrete step to address homelessness from a city planning perspective is to create more affordable and supportive housing.</p> <p>Priority projects to serve the homelessness include:</p> <ol style="list-style-type: none"> 1. Street Outreach to engage unsheltered homeless people in the services of the Continuum of Care. 2. Emergency Shelter Support to assist with operating expenses of running emergency shelters. 3. Rapid Re-housing to provide homeless individuals with immediate housing and supportive services. 4. Essential services, such as Case management; Employment Assistance and Job Training; Outpatient Health Services; Legal Services; Mental Health Services; Substance Abuse Treatment Services; Transportation; and more. 5. Homeless Prevention to help stave off threats to stable housing such as eviction and utility shutoffs. 6. Support for existing Transitional Housing projects.
	Basis for Relative Priority	The basis for this relative priority is the severity of the homelessness problem in the Lehigh Valley and, more acutely, in the City of Allentown.
	4	
	Priority Need Name	Improve Mobility & Connectivity
	Priority Level	Low
	Population	<p>Extremely Low</p> <p>Low</p> <p>Moderate</p> <p>Middle</p> <p>Large Families</p> <p>Families with Children</p> <p>Elderly</p> <p>Public Housing Residents</p> <p>Persons with Physical Disabilities</p>

	Geographic Areas Affected	City-wide
	Associated Goals	Economic Development/Job Creation Public Infrastructure Improvements Public Safety Goals Special Needs Goals (Non-Homeless)

Description	<p>People need to connect with physical infrastructure such as sidewalks and roads, they need the means to travel such as bikes, cars, and public transit, and they need other ways of connecting, such as virtual networks. Cities provide the infrastructure that enables people of all ages to connect through the design of neighborhoods, the regulation and/or operation of transportation systems, and access to virtual networks.</p> <p>The following further describes the activities to be undertaken under this priority:</p> <p>CREATE SAFE AND EFFICIENT ROUTES: A citywide mobility plan, coordinated with the Lehigh Valley Planning Commission's (LVPC) regional Walk/RollLV plan should assess the physical infrastructure, existing and emerging technologies and services, and lastly, how people make mobility choices. Mode optimization such as LANTA's Enhanced Bus Service proposes that dedicated lanes, signal prioritization, and transit-oriented development, could lead to increased service frequency and decreased travel times. Trail and bikeway systems provide dedicated or shared routes that decrease travel times and increase safety. Complete Streets is an umbrella concept that integrates multiple modes of transportation into a safe, physically attractive, and economically desirable streetscape and enables children to be independent through programs like Safe Routes to School.</p> <p>CONNECT PLACES IN THE CITY: Well-designed streets provide alternative routes, enable bicycle and pedestrian circulation, create greater access, and decrease congestion. Allentown's dense street grid makes it one of the largest walkable areas in the Lehigh Valley. Infrastructure improvements, combined with targeted development strategies, can create vibrant urban destinations and strengthen the viability of Allentown's urban network.</p> <p>WELCOME PEOPLE TO THE CITY: Improvements to the experience of entering the city would help establish Allentown's identity and thereby support economic development. Gateways and signage could help orient people to centers within the city and help clusters of businesses market themselves to Allentonians and visitors alike. A shared parking strategy could dynamically manage demand for car storage and could promote alternative transportation through price signals. Establishing gateways and coordinated signage, potentially through a wayfinding initiative, can lead to stronger recognition of and improved economic activity for Allentown attractions, such as: cultural districts and corridors like the Theater District and the Seventh Street restaurant corridor; major destinations and attractions like the Fairgrounds and the PPL Arena;</p>
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		<p>institutions like hospitals and universities; and neighborhoods and historic districts.</p> <p>CREATE MOBILITY CHOICES: As the perception (and reality) of traffic congestion increases, improved bike and pedestrian networks, safe and identifiable transit stations, and more convenient service frequency could change the calculus and make car alternatives more appealing.</p> <p>PREPARE ALLENTOWN TO BE A SMART CITY: With rising numbers of employees working from home or remotely, the importance of physical connection to job centers is waning for knowledge-centric industries. Access to digital services is a major component in education - students who have access to the internet do better in school and are better poised to succeed after graduation. Allentown will need to incorporate planning for the expanded broadband service and capacity in order to provide residents with digital connections.</p>
	Basis for Relative Priority	Allentown's success is linked to regional economic opportunities, housing, and other cultural assets. Residents of Allentown need to be able to easily and efficiently access job opportunities outside and within the city. Job growth in Allentown is attracting people from surrounding municipalities and they need efficient ways to access the city.
5	Priority Need Name	Improve Living Systems
	Priority Level	Low
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents
	Geographic Areas Affected	City-wide
	Associated Goals	Public Infrastructure Improvements Public Safety Goals Public Facilities Improvements

Description	<p>Living Systems address both community and environmental health. Community health includes physical health as well as how Allentonians can thrive in their communities – ensuring neighborhoods are safe, walkable, and promote a culture of health. Environmental health looks at the natural systems that support Allentown, from the greenspaces and parks to the streams and Lehigh River. Ensuring Allentown’s Living Systems are healthy, resilient, and sustainable will support a vibrant and prosperous future.</p> <p>The underlying themes of this priority are as follows:</p> <p>INCREASE ENVIRONMENTAL STEWARDSHIP: Everyone can care for the environment, whether in daily actions by an individual or in larger and longer-term actions that need to be accomplished by many people acting together. There needs to be a mix of activity to improve Allentown’s environment, from engaging residents and businesses to support neighborhood cleanups to working to mitigate noise pollution.</p> <p>CREATE PRODUCTIVE AND CONNECTED URBAN LANDSCAPES: Urban open space and parks are often considered a sign of environmental health, yet the presence of green space does not mean that the urban landscape is functioning at a healthy level. Allentown has many opportunities for win-win solutions where flood control and water quality improvements yield both ecological and economic benefits and opportunities for networked trails, parks, and outdoor recreation and learning environments.</p> <p>PLAN FOR A SUSTAINABLE AND RESILIENT ALLENTOWN: As cities consider their long-term sustainability and resilience, they need to respond to shocks, like a natural disaster, as well as stressors, like a lack of food access. As a growing city and economic center, Allentown needs to consider the long term viability of its services in light of shock and stressors associated with economic conditions like rapid growth, environmental conditions associated with climate change, and social conditions like access to services and opportunities for immigrant populations. Allentown can reinvent itself as a model small city with regard to sustainability and resilience.</p>
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	Basis for Relative Priority	The health of the community and the environment is essential for a city to thrive. Ensuring Allentonians are living in healthy neighborhoods provides the foundation for a strong education, workforce development, and economic opportunity. Furthermore, as Allentown plans to become a more sustainable city in the face of climate change, we will become more resilient to disruptive events such as flooding, heatwaves, and extreme weather that can affect economic development.
6	Priority Need Name	Improve Access to Essential Services & Amenities
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	City-wide

	Associated Goals	New Affordable Ownership Housing Homeless Support Activities Public Services Special Needs Goals (Non-Homeless)
	Description	<p>To improve quality of life for all citizens of Allentown, it is important to provide necessary services that meet daily needs in a convenient and welcoming way. In the Allentown Vision 2030 community planning process, what rose to the top was the importance of providing access to training facilities, grocery stores, banking, and programs to assist returning populations and the homeless. Access to these services defines a just and equitable society and provides a foundation for citizens not just to survive, but to improve their lives.</p> <p>Community health is closely tied to the places where we live, learn, work and play. Improvements in residents' health result from limiting exposure to negative conditions, such as poor air quality, flooding, and noise, as well as from adopting of beneficial activities like exercise and healthy eating habits. To improve community health, Allentown can adopt the CDC's call to "change the context to make healthy choices easier."</p>
	Basis for Relative Priority	The need for public services was a common theme throughout focus groups and public hearings conducted in preparation of this Plan. In addition, the Allentown Vision 2030 Plan listed Amenities and Services as one of its five guiding principles.
7	Priority Need Name	Support Public Housing
	Priority Level	Low
	Population	Extremely Low Low Moderate Public Housing Residents
	Geographic Areas Affected	City-wide
	Associated Goals	New Affordable Rental Housing
	Description	Support activities that improve the health, safety and accessibility of public housing residents as well as improve energy efficiency and environmental stewardship of the Allentown Housing Authority properties.

	Basis for Relative Priority	The Allentown Housing Authority has the experience and access to resources to improve the condition of existing and availability of new affordable housing. The City is in a unique position to help support those efforts.
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Narrative (Optional)

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The City of Allentown is not intending to allocate funding to traditional Tenant-Based Rental Assistance Programs in this Consolidated Plan cycle. However, it remains a priority of the City to allocate a large portion of Emergency Solutions Grant (ESG) to rapidly rehousing the homeless population. Rapid rehousing programs are a voucher-based program that are administered very similarly to traditional TBRA programs. The demand for long-term supportive housing for the homeless far exceeds available resources.
TBRA for Non-Homeless Special Needs	The City of Allentown is not intending to allocate funding to Tenant-Based Rental Assistance for Non-Homeless Special Needs populations in this Consolidated Plan cycle.
New Unit Production	The largest market factor impacting the creation of new affordable housing is the rising real estate values in the City. This market factor impacts the financial feasibility of all affordable housing developments.
Rehabilitation	Market factors influencing the rehabilitation of housing include: age of housing stock; general economic conditions, including income and employment levels as factors which affect whether homeowners repair their homes or not; positive rate of return; presence of lead-based paint, and market interest rates.
Acquisition, including preservation	Market conditions influencing acquisition and preservation of housing are: age of structure, cost of land, cost of infrastructure improvements required for development of land and positive rate of return.

Table 52 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

Allentown's Program Year 2020 allocations are as follows:

CDBG: \$2,305,197

HOME: \$975,569

ESG/HESG: \$198,373

Funding amounts shown for the remaining four (4) years of the Consolidated Plan were estimated by multiplying PY2020's allocation by four.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,305,197	83,000	0	2,388,197	9,220,788	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	975,569	0	0	975,569	3,902,276	
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	0	0	0	0	0	Allentown is not a HOPWA recipient.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	198,373	0	0	198,373	793,492	

Table 53 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The federal CDBG and HOME funds are intended to provide low- and moderate-income households with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration. The City will partner with other public agencies and nonprofit organizations, when feasible, to leverage resources and maximize outcomes development. The City of Allentown will continue to utilize a wide range of state and local funding sources to leverage CDBG funds.

The City of Allentown has encouraged private developers and non-profit groups to participate in community revitalization efforts, particularly in the development of affordable housing. These groups may access such funding sources as the Federal Home Loan Bank or the Low-Income Housing Tax Credit Program to supplement other resources in developing affordable housing for the low income and special needs populations.

Allentown will continue to leverage funds from the Pennsylvania Housing and Finance Agency, Department of Community and Economic Development, and other agencies to address the housing goal.

Leveraging of ESG funds will be accomplished through a combination of grants and other fundraising efforts of the ESG subrecipients.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Several projects are expected to take place on public land and right of ways. These projects will address the need to **Improve Mobility and Accessibility**.

Discussion

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
ALLENTOWN	Government	Economic Development Non-homeless special needs Ownership Planning neighborhood improvements public facilities public services	Jurisdiction
REDEVELOPMENT AUTHORITY OF THE CITY OF ALLENTOWN	Redevelopment authority	Ownership Rental	Jurisdiction
ALLENTOWN ECONOMIC DEVELOPMENT CORPORATION	Redevelopment authority	Economic Development	Jurisdiction
ALLENTOWN NEIGHBORHOOD HOUSING SERVICES, INC	Non-profit organizations	Ownership Rental	Region
Allentown Housing Authority	PHA	Public Housing	

Table 54 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The Community Development Dept. is responsible for the overall implementation of the five-year strategy. It administers the contracts with nonprofit organizations providing housing rehabilitation services, homeownership opportunities, shelter and supportive counseling for the homeless, and social services for those threatened with homelessness. The Department works in conjunction with Allentown Housing Authority (AHA), the Bureau of Planning and Zoning, the Bureau of Building Standards and Safety is responsible for code enforcement, systematic inspections, owner occupied rehabilitation and for demolition of dilapidated buildings, the Bureau of Health is responsible for the childhood lead testing

program, the Redevelopment Authority of the City of Allentown and the Allentown Economic Development Corporation.

An important part of the institutional structure for affordable housing and community development in Allentown is represented by community-based nonprofit organizations. The city's nonprofit development organizations are "specialized" organizations because they focus on fulfilling a small role in the larger picture of delivering affordable housing in a region with great need. Some of the city's nonprofit organizations limit their efforts to a small geographic area, such as a neighborhood, for maximum impact. The focus tends to be on a particular type of housing (e.g. new units for small families with children) or on meeting a particular need (e.g. rehabilitation of existing units for very LMI households). The City currently works with Alliance for Building Communities, Housing Association and Development Corporation, Habitat for Humanity and Neighborhood Housing Services.

The City of Allentown's strengths include: ability to coordinate multiple programs, capacity for varied activities, and technical expertise. The City's weaknesses include: limited resources, limited staff, and relatively slow ability to react in comparison to NGOs.

The Allentown Housing Authority's strengths include: direct connection to low and moderate income households; ability to access certain housing resources; and extensive portfolio of housing. AHA's weaknesses include: limited staff and resources; relatively slow ability to react in comparison to NGOs.

Nonprofits strengths include: provision of varied support services, community integration, and ability to react quickly in comparison to government entities. Nonprofit weaknesses include: extremely limited resources and long-term financial stability.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics	X		
Other Street Outreach Services		X	

Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X		
Education	X		
Employment and Employment Training	X		
Healthcare	X	X	
HIV/AIDS	X		X
Life Skills	X		
Mental Health Counseling	X	X	X
Transportation	X		
Other			

Table 55 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

There are many social service agencies in Allentown and throughout the LVRHAB region that provide benefits to very low and low-income individuals and families in order to prevent homelessness. These organizations also serve the needs of those who have already become homeless. Allentown's government also provides an extensive network and referrals to other government agencies and/or social services when needed. A few of these agencies include the following:

Allentown Housing Authority;
 Allentown Rescue Mission;
 Community Action Committee of Lehigh Valley;
 Lehigh Valley Conference of Churches;
 Lehigh Valley Center for Independent Living;
 The Salvation Army; and
 Turning Point of the Lehigh Valley.

These organizations provided many services to homeless or at-risk residents, including but not limited to: counseling, case management, life skills training, financial literacy classes, and victim advocacy. These services help residents develop skills and knowledge to transition into permanent supportive housing or independent living and to gain steady employment. The ultimate goal of providing supportive services is self-sufficiency.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Homelessness and the needs for the special needs population in the City of Allentown is a concern of many of the City's departments including the Department of Community and Economic Development, the Police and Fire Departments, the Department of Parks and Recreation, the Department of Public Works, the Bureau of Solid Waste and Recycling, the Health Bureau, the Bureau of Building Standards and Safety, and the Bureau of Planning and Zoning. Each area now has a standard protocol that dictates how a homeless individual or family is assisted. City staff also assists with the annual Point-in-Time Count, among other activities related to homelessness.

The City of Allentown is supported in its task by the Continuum of Care (CoC) process led by the Eastern PA CofC. The Eastern PA CofC is one of two regional efforts created to encompass non-entitlement portions of the state in order to receive homeless assistance from HUD. Within the region, the Lehigh Valley Regional Homeless Advisory Board encompasses Lehigh and Northampton counties along with the Cities of Allentown, Bethlehem and Easton. The LVRHAB has helped secure \$4 million in competitive grants for the region to provide homeless housing and support services.

However, gaps in the service delivery system exist, including: inadequate funding to provide the level of services needed; and uneven geographic coverage of services. In addition, the following issues have been identified:

- Insufficient public awareness of services and needs;
- Various regulations tied to a variety of funding sources, no uniform definition of homelessness for a variety of government programs;
- Some language and cultural barriers; and
- Cultural barriers which may prevent accepting government assistance.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Rehabilitation of Owner-Occupied Homes	2020	2024	Affordable Housing		Create and Preserve Affordable Housing	CDBG: \$500,000	Homeowner Housing Rehabilitated: 25 Household Housing Unit
2	New Affordable Ownership Housing	2015	2019	Affordable Housing		Create and Preserve Affordable Housing Improve Access to Essential Services & Amenities	CDBG: \$80,000 HOME: \$800,000	Public service activities for Low/Moderate Income Housing Benefit: 460 Households Assisted Homeowner Housing Added: 8 Household Housing Unit
3	New Affordable Rental Housing	2015	2019	Affordable Housing Public Housing		Create and Preserve Affordable Housing Support Public Housing	HOME: \$800,000	Rental units constructed: 100 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Homeless Support Activities	2015	2019	Affordable Housing Homeless		Create and Preserve Affordable Housing Reduce Homelessness Improve Access to Essential Services & Amenities	CDBG: \$200,000 ESG: \$720,000	Public service activities for Low/Moderate Income Housing Benefit: 450 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 15 Households Assisted Homeless Person Overnight Shelter: 1500 Persons Assisted
5	Public Infrastructure Improvements	2015	2019	Non-Housing Community Development		Improve Mobility & Connectivity Improve Living Systems	CDBG: \$1,200,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 25000 Persons Assisted
6	Public Safety Goals	2015	2019	Public Safety		Build a Strong, Resilient and Diversified Economy Improve Mobility & Connectivity Improve Living Systems	CDBG: \$2,000,000	Buildings Demolished: 90 Buildings

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Public Facilities Improvements	2020	2024	Public Facilities		Improve Living Systems	CDBG: \$750,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4000 Persons Assisted
8	Special Needs Goals (Non-Homeless)	2015	2019	Affordable Housing Non-Homeless Special Needs		Improve Access to Essential Services & Amenities Improve Mobility & Connectivity	CDBG: \$100,000	Public service activities other than Low/Moderate Income Housing Benefit: 460 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 460 Households Assisted
9	Public Services	2015	2019	Public Services		Improve Access to Essential Services & Amenities	CDBG: \$1,750,000	Public service activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 100 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	Economic Development/Job Creation	2015	2019	Economic Development		Build a Strong, Resilient and Diversified Economy Improve Mobility & Connectivity	CDBG: \$160,000	Public service activities other than Low/Moderate Income Housing Benefit: 400 Persons Assisted Businesses assisted: 15 Businesses Assisted
11	Planning and Administration	2015	2019	Planning and Administration			CDBG: \$2,300,000 HOME: \$700,000	Public service activities for Low/Moderate Income Housing Benefit: 50 Households Assisted Other: 1 Other

Table 56 – Goals Summary

Goal Descriptions

1	Goal Name	Rehabilitation of Owner-Occupied Homes
	Goal Description	The City will annually implement activities to maintain and improve the condition of the housing stock to meet or exceed current code standards, improve energy efficiency, and comply with the City's Property Maintenance Code. Projects that will address this goal include the Hazard Elimination Program to repair or replace major housing systems that have failed and are posing a threat to the owner's health and safety.

2	Goal Name	New Affordable Ownership Housing
	Goal Description	The City will implement and subcontract several activities to support the creation of new affordable ownership housing: First-time homebuyer education and counseling; Down payment Assistance; and Subsidizing the development of new affordable ownership housing.
3	Goal Name	New Affordable Rental Housing
	Goal Description	The City's support of new affordable rental housing will focus on subsidies to housing developers, including the Allentown Housing Authority. HOME funds will generally support this activity with leveraged resources including the Low-Income Housing Tax Credit Program and Federal Home Loan Bank programs.
4	Goal Name	Homeless Support Activities
	Goal Description	The City of Allentown will use a variety of different programs as well as funding sources to help serve the social service and housing needs of the City's homeless population.
5	Goal Name	Public Infrastructure Improvements
	Goal Description	The City will undertake a series of public infrastructure projects over the course of this Plan, including road reconstruction, water and sewer improvements, and lighting improvements. Given the nature of these types of improvements, the City anticipates benefitting as many as 25,000 people under this goal over the course of the Plan.
6	Goal Name	Public Safety Goals
	Goal Description	This goal will primarily focus on the demolition or stabilization of buildings that are posing a threat to the public's health and safety. The number of demolished properties is expected to be approximately 90 over the course of this Plan.

7	Goal Name	Public Facilities Improvements
	Goal Description	Public facilities are defined as those buildings or spaces that serve the residents of Allentown. Often public facilities are owned and operated by the City, in the case of parks and senior centers. However, vital public facilities are also owned and operated by nonprofit organizations. Examples might include the YMCA and the Boys and Girls Club. In order to be eligible for assistance from the CDBG program, the facility must primarily benefit low- and moderate-income residents.

8	Goal Name	Special Needs Goals (Non-Homeless)
	Goal Description	<p>The City will fund a full array of services for special needs populations, including:</p> <p><u>Priorities for the Elderly/Frail Elderly Population</u></p> <p>Continue to support, locally and on a regional basis, activities that provide affordable housing for elderly and frail elderly residents at or below 80% of area median income.</p> <p>Priorities for Persons with Mental Illness</p> <p>Continue to support locally and on a regional basis, local agencies that provide supportive services and outreach programs to individuals with mental illness.</p> <p>Continue to support, on a regional basis, an increase in the supply of transitional and permanent supportive housing facilities for persons with mental illness and mental disabilities. These facilities should provide case management services to residents.</p> <p><u>Priorities: for Persons with Disabilities</u></p> <p>Continue to support, locally and on a regional basis, local agencies that provide supportive services and outreach programs to individuals and families who have</p> <p><u>Priorities for Persons with Alcohol and Drug Addiction</u></p> <p>Continue to support, locally and on a regional basis agency that provide outreach programs to individuals with drug and alcohol problems.</p> <p><u>Priorities for Persons with HIV/ AIDS</u></p> <p>Continue to support, locally and on a regional basis, efforts that provide affordable housing to people living with HIV AIDS.</p> <p>Continue to support organizations that provide supportive services to people living with HIV AIDS</p>

9	Goal Name	Public Services
	Goal Description	<p>Increase the availability of public services for Allentown's low- and moderate-income residents. The CDBG regulations allow the use of grant funds for a wide range of public service activities, including, but not limited to:</p> <ul style="list-style-type: none">Employment services (e.g., job training);Crime prevention and public safety;Child care;Health services;Substance abuse services (e.g., counseling and treatment);Fair housing counseling;Education programs;Energy conservation;Services for senior citizens;Services for homeless persons;Welfare services (excluding income payments);Down payment assistance; andRecreational services. <p>While exact numbers of beneficiaries will vary from year to year, the City's public service projects are expected to serve approximately 1,000 low- and moderate-income residents each year.</p>

10	Goal Name	Economic Development/Job Creation
	Goal Description	The City expects to fund several different kinds of projects with CDBG funds to further this goal. Activities might include, job training and readiness programs, vocational training, and GED programs. The City also anticipates funding training and assistance programs for the start-up of small business, including micro-enterprise assistance. Beneficiaries will include individuals seeking employment as well as small businesses.
11	Goal Name	Planning and Administration
	Goal Description	Planning and Administration expenses include salary and wages of City employees, consultants and direct expenses for administration of the CDBG, HOME and ESG programs. CDBG regulations permit the use of administration funds for fair housing activities. The 50 individuals listed as beneficiaries of this activity are expected to result from fair housing activities during the period of this Consolidated Plan.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

During the 2020-2024 Consolidated Planning period, the City estimates the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing at 125 households.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)**Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

Public Housing residents and applicants' accessibility needs vary from size to configuration and amenities. The Allentown Housing Authority (AHA) strives to place applicants in suitable units and transfer residents promptly after receiving the proper request and documentation from their physician.

Over the past several years, the AHA has focused on making physical upgrades to all its family and elderly public housing developments through the annual Capital Fund grant (approximately \$1.5 million annually). Ongoing repairs and modernization activities include kitchen and bathroom modernizations, new HVAC and water improvements, new sidewalks, curbs, and roofing. Plans are to request funding for elderly services as well as new housing construction funding from the federal government in the future.

Activities to Increase Resident Involvements

The Gross Towers and Towers East public housing developments currently have a resident council. The resident councils provide input and are primarily involved in planning for, and feedback on, the renovation/modernization needs of the developments. The resident councils attend regular meetings and take part in the planning processes for both the Five-Year and annual Public Housing Authority (PHA) plans that are submitted to HUD.

The Allentown Housing Authority (AHA) recognizes the inherent difficulty in keeping the resident councils engaged. As such, the AHA plans to seek involvement and support of the councils by scheduling regular meetings with the AHA Executive Director.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

Not applicable

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Affordability is closely linked to the number of available housing units or the supply of housing relative to housing demand in a market. Unlike its more suburban and rural neighbors, Allentown neighborhood patterns have been set for decades and the city does not have much undeveloped land. However, Allentown does have key parcels available for redevelopment, such as the State Hospital site, riverfront redevelopment, and redevelopment of underutilized areas such as vacant retail sites and former industrial sites.

The character and fabric of the different neighborhoods of Allentown are a major asset that adds to the authenticity and quality of life. Zoning updates should make it easier to preserve that character while also adding in appropriate density. Allentown's Zoning Ordinance currently has eight different classifications of residential. Given the large variety of homes in the city, it seems that the original authors tried to create specific conditions to allow for neighborhoods to retain their identity. With this in mind, a new Zoning Code could more efficiently retain this character, while allowing for change and adaptation.

Currently, residential zones have minimum lot widths. Many of these lot widths do not correspond with the actual lot sizes. If home prices in Allentown increase, this can encourage consolidation of lots, in order to build larger homes, which impacts neighborhood character and decreases the availability of smaller, more affordable homes. A new ordinance could include the provision that existing lot widths within each zone are suitable.

Residential zones should also align with the type of housing that exists in each zone. For example, in the Low-Density Residential categorization, twin dwellings are not permitted, but there are a number of these structures in Hamilton Park, which is an R-L zone.

Where accessory dwelling units are permitted, it is worth considering whether front, back, and side setbacks allow for units to be built that meet the requirements for habitation.

Like most other towns in the United States, Allentown utilizes the International Building Code (IBC) to govern construction of buildings. These building codes address public health and safety with measures peer-reviewed by the ICBO and the International Codes Council and are based in building science. The IBC offers guidance as to where a building should be placed on a lot, and the amount of square footage a building should contain. This guidance could be used in place of existing zoning and would simplify the building process.

Regional Analysis of Impediments to Fair Housing Choice

In 2019, Northampton County, and the cities of Allentown, Bethlehem, and Easton agreed to prepare a joint Regional Analysis of Impediments to Fair Housing Choice. This Regional AI is an endeavor to streamline the Lehigh Valley region's approach to fair housing and to identify and address impediments to fair housing choice that often do not strictly follow jurisdictional boundaries. By conducting this

regional analysis, communities across the Lehigh Valley will be able to promote fair housing choices for all persons, provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities.

As of the submission date of this Consolidated Plan, the Regional Analysis of Impediments to Fair Housing Choice had not yet been finished. Once it has been reviewed and approved, this Plan will be amended to include the findings and recommendations of the Regional AI.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

While the City funds activities each year directly related to addressing barriers to fair housing choice, this section will be updated with release of the 2020 Regional Analysis of Impediments to Fair Housing Choice to reflect the specific strategy outlined in that document.

SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Lehigh Valley has formal outreach teams that work to identify and engage unsheltered persons through outreach and services. Outreach is conducted at soup kitchens and other known locations where street homeless congregate. Additional outreach and other services are provided by the chronic homeless providers throughout the Lehigh Valley. The Lehigh County Conference of Churches' Linkage program provides street outreach to the homeless population in Allentown. Valley Youth House provides a street outreach program for youth in Allentown.

Addressing the emergency and transitional housing needs of homeless persons

The City of Allentown is home to a large network of provider agencies that address the shelter and transitional housing needs of persons who are homeless.

The shelters and transitional housing in Allentown:

Community Action Committee of the Lehigh Valley - 6th Street Shelter (ES)

Community Action Committee of Lehigh Valley- Turner St. Apartments (TH)

Salvation Army Emergency Shelter (ES)

Allentown Rescue Mission (ES)

Turning Point of the Lehigh Valley (Domestic Violence) (TH)

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Finding available, affordable units is the challenge most households face in their efforts to move from shelter or transitional to permanent housing. Housing supply is limited and is often priced higher than many households can afford. Affordable units may not be safe or meet minimum housing code standards. The City is working to address the availability and condition of affordable housing and provides a substantial amount of its CDBG and HOME funds to housing.

The LVRHAB encourages shelters and transitional housing providers to access the listing of affordable units on PHFA's housing locator website.

The LVRHAB tracks the length of time households remain homeless continually works to reduce that time. The RHAB hopes to partner with housing authorities to give preference to homeless families. They also plan to address employment and training opportunities to increase income of homeless individuals and households before they leave shelter or transitional housing.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The LVRHAB is participating with other state CoCs through the PA Homeless Steering Committee to develop partnerships with state agencies that operate programs that discharge individuals to homelessness. Progress has been made with several agencies. Discharge planning by youth serving agencies includes steps to prepare youth for discharge from foster care and penal institutions. Mental health discharge is coordinated with the County Office of Mental Health. The Departments of Corrections and Public Welfare are working to implement a new protocol to ensure that those leaving penal institutions are enrolled in Medical Assistance through the COMPASS application process. This process also will tie into Food Stamps and cash assistance shortly. Discharge from health care is more difficult due to the special needs and short time frame involved in discharge. The PA Homeless Steering Committee is working with the Department of Health, Division of Acute and Ambulatory Care to research and establish protocols.

Coordination of services and local advocacy ensures that families that are already enrolled in one system of care are properly referred to other agencies providing appropriate services. The implementation of some form of coordinated assessment/centralized intake will expand the degree of coordination.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

Due to the age of the housing stock, particularly the stock available to low- to moderate- income households, Allentown's Bureau of Health has been active in preventing lead poisoning for children for over 35 years. The Bureau seeks to identify children at risk of lead poisoning, assures medical treatment and case management for the children and their families, and assures that lead hazard reduction activities are conducted in premises where environmental investigations reveal excessive lead levels. Historically, the Health Bureau actively screened children for lead poisoning and provides outreach and presentations at family centers, safety carnivals, health fairs, and childcare centers. The Bureau collaborates with area hospitals and family health centers to provide and promote lead screenings. Because of extensive budget cuts, however, the Health Bureau's outreach and testing have been severely reduced in recent years.

There are several possible explanations for the low incidence of childhood lead poisoning in Allentown. One possible reason is the aggressive housing rehabilitation program, conducted by the City's Bureau of Building Standards and Safety, which was historically funded through the CDBG Program. Over 5,000 homes have been inspected during the last 38 years. Also, the housing stock in the City is mostly brick, with few painted, wooden structures.

The City recently concluded the implementation of a three-year Lead Hazard Reduction Grant from the US Department of Housing & Urban Development. The grant was successful in removing lead hazards from fifty-three (53) homes where a child under age six was found to have an elevated blood lead level – three more than the 50-unit target. Thirty-three (33) very low-income families and nineteen (19) low-income families were assisted by the program. Eleven (11) of the assisted properties were owner-occupied and the remaining forty-two (42) were rentals. The grant was also successful in training and certifying eighteen (18) contractors with the Lead Abatement Supervisor certification. Allentown's Community Health Specialist completed more than fifty (50) outreach events reaching over 2,000 families with education, support and testing referrals. The Community Health Specialist conducted 138 home assessments where children under six had an elevated blood lead level. Assessments included a lead risk assessment, education and cleaning supplies. The City was also able to purchase a lead blood analyzer with the grant to help increase the rate of testing in Allentown.

The City will continue to ensure that all housing rehabilitation work is done in accordance with all lead-based paint regulations, with housing units certified as lead-safe upon completion.

All contractors working on federally funded programs must have the appropriate lead certifications and that documentation is kept on file in the City.

How are the actions listed above related to the extent of lead poisoning and hazards?

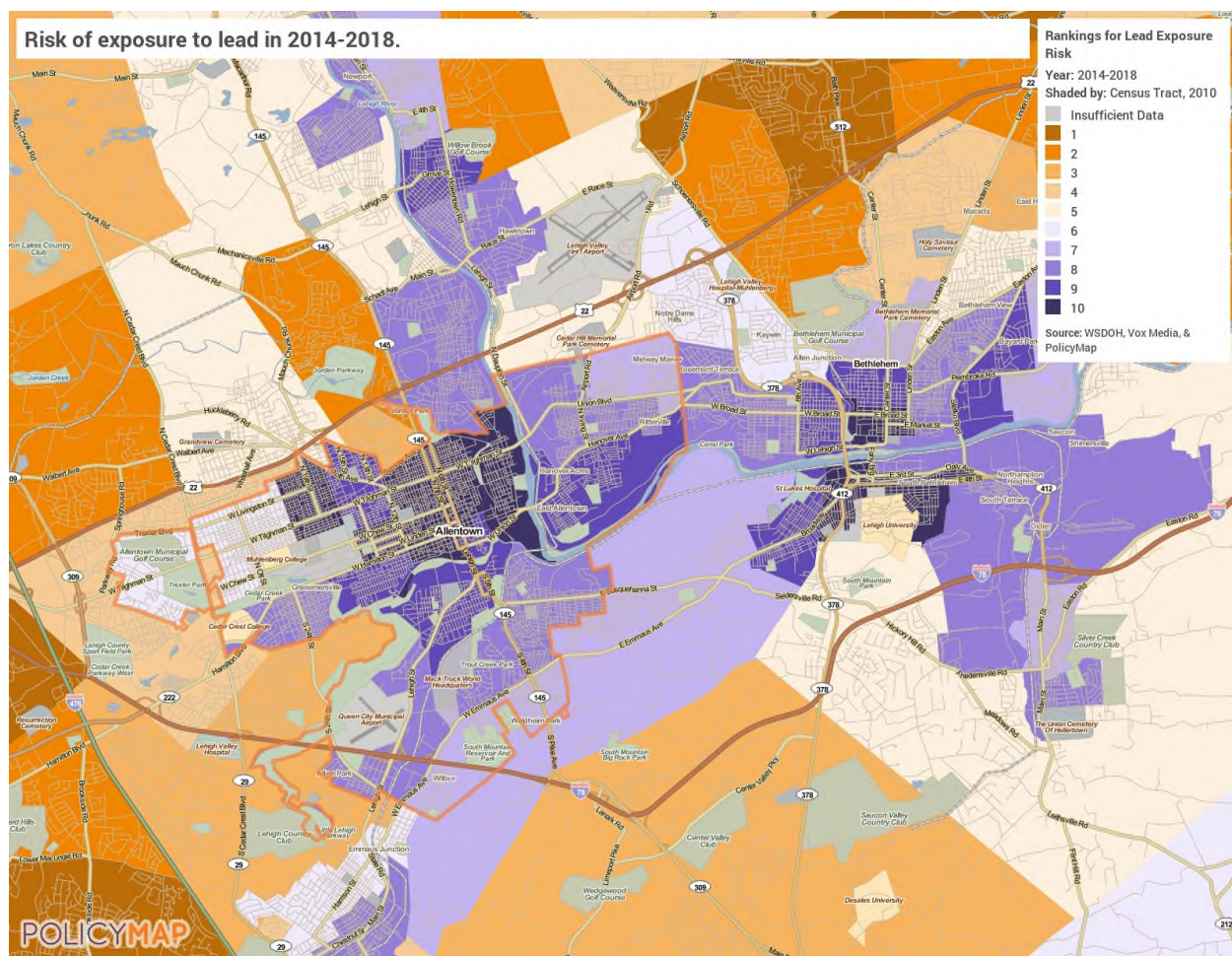
According to the 2014-2018 American Community Survey, the City of Allentown has 45,749 housing units, 84.4% of which (38,625) were constructed prior to 1980. The attached map ranks the risk of lead hazards by census tract using based on the age of the home and other data. Most census tracts in Allentown scored an 8, 9 or 10 on the scale of 1 to 10.

How are the actions listed above integrated into housing policies and procedures?

In addition to the Allentown Health Bureau's outreach and education effort, a key component of the LHC program is the training of contractors in Lead Safe Work Practices. To date, more than 25 [update] workers, representing eight [update] contracting companies, have been trained in same, and additional trainings are expected to be offered in the future.

The program complements continuing activities of both the Bureaus of Health and Building Standards and Safety. The Health Bureau's Childhood Lead Poisoning Prevention Program identifies children who were at risk of lead poisoning, assures that medical treatment and case management were done, and that lead hazard reduction activities were conducted in premises where environmental investigations revealed excessive lead levels. This program began in January 1993; however, the City's Bureau of Health has had an active lead poisoning prevention program for approximately 30 years.

Administrative and code enforcement staff continue to take advantage of training opportunities. Also, staff works to disseminate appropriate information to nonprofit organizations and contractors who will be impacted.

**Lead Exposure Risk**

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

According to the 2014-2018 American Community Survey, 26.16% of Allentown residents live in poverty. The City believes that the most effective method of lowering the number of households living in poverty is to assist them in developing the skills necessary to become more independent and self-sufficient.

Each year, the City budgets a portion of its CDBG funds to the provision of human services, largely to assist extremely low-income individuals and families. For adults, the City funds literacy programs, vocational training, micro-enterprise lending and business start-up counseling, and first-time homebuyer programs. For children, CDBG funds are used to support supplemental formal education, life-skills education, cultural enrichment, and structured recreation.

For persons with special needs who have a permanent disability, it may not be practical to expect a reduction in the number of households with incomes below the poverty line, depending on their level of disability. It is possible, however, to offer persons with special needs appropriate options in living environments. Supportive services likely will be an important part of any option chosen. For those who choose to live independently, supportive services will be essential to maintaining their independence. In addition to the services mentioned previously, which are available to all extremely low-income residents, the City funds several services for persons with special needs. For example, it supports a drop-in center for the mentally ill and persons addicted to alcohol or other drugs. The City's housing rehabilitation programs often enable elderly or frail elderly homeowners to remain in their home and allow those with physical limitations to adapt their home to their specific needs.

The City continues to make efforts in meeting the supportive needs of the homeless, those threatened with homelessness, and those with special needs. In the case of the homeless, the purpose of the supportive services is to assist them in dealing with the problems that led to their homelessness. Hopefully, their stay in a shelter facility and access to permanent supportive housing will lead to self-sufficiency. The City will use ESG funds to support the operating budget of emergency shelters and a rapid re-housing program. This will allow the sheltering organizations to provide more intensive social services to the participants in their programs. In addition, whenever possible, the City will assist the shelter providers in obtaining financial assistance to meet the physical needs of the sheltering facilities.

Previously, it was established that those threatened with homelessness usually are of extremely low income. They are also often in need of a wide range of social services to remove the threat of homelessness and to develop the skills necessary to increase the independence and self-sufficiency.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

As the city continues to grow, it is important to encourage mixed-income neighborhoods. The city does not want to create isolated pockets of poverty by developing additional affordable housing in neighborhoods that are already primarily low-income. Encouraging a mix of incomes in a neighborhood is important in bringing vitality to a city. This can be done through the development of market rate housing and affordable housing within one development. Other ways to encourage mixed-income neighborhoods include identifying key parcels for development or redevelopment within areas of the city that can accommodate additional housing. While it may not happen with every project, it is critical to consider where new housing is being proposed and how it will impact the community. The city will continue to work with developers of both market rate housing and affordable housing to identify key parcels throughout the city that have redevelopment opportunities.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Most of the activities described previously will be implemented by the City's Department of Community and Economic Development and nonprofit organizations. Each year, the Department of Community and Economic Development prepares an annual plan, based on the City's Consolidated Plan, detailing its anticipated activities during the upcoming program year. Once the plan is approved by the Mayor and City Council, staff are assigned their priorities for the new program year.

Once the new program year has started, supervisors within the Department of Community and Economic Development meet with the staff on a regular basis to monitor their progress towards meeting the objectives outlined in the plan, and to ensure compliance with Federal statutory and regulatory requirements. All expenditures are reviewed by supervisors within the Department of Community and Economic Development. The financial status of the various programs is reviewed on a bi-weekly basis by accounting, administrative, and programmatic staff.

Each year, nonprofit organizations submit applications for funding through City-administered Federal grant programs. The applications are reviewed for eligibility and appropriateness, and the organizations are evaluated for their ability to properly administer the proposed program. Once funding decisions are made, the proposals are used to prepare the contracts with the agencies. Each contract includes a description of the activities to be funded, a schedule for completing the work, the anticipated accomplishments (written as Outcome-Based Objectives) and a budget. The contract also details the applicable Federal regulatory requirements.

Each nonprofit organization must submit monthly progress reports, which enable the City to compare the actual accomplishments to the objectives stated in the contract. Similarly, invoices are compared to the budget contained in the contract. Concerns raised by the progress reports or the invoices are shared with the nonprofit organization. The financial status of the various activities is reviewed by accounting and administrative staff on a bi-weekly basis.

The City conducts on-site monitoring of each subrecipient once a year. Additional monitoring may be necessary in some cases. At the end of the program year, the nonprofit organization must submit a cumulative report describing the accomplishments for the entire year. In addition, each agency must submit an annual audit, either a Single Audit or an audit conducted in accordance with generally accepted auditing standards.

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

Allentown's Program Year 2020 allocations are as follows:

CDBG: \$2,305,197

HOME: \$975,569

ESG/HESG: \$198,373

Funding amounts shown for the remaining four (4) years of the Consolidated Plan were estimated by multiplying PY2020's allocation by four.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,305,197	83,000	0	2,388,197	9,220,788	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	975,569	0	0	975,569	3,902,276	
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	0	0	0	0	0	Allentown is not a HOPWA recipient.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	198,373	0	0	198,373	793,492	

Table 57 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The federal CDBG and HOME funds are intended to provide low- and moderate-income households with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration. The City will partner with other public agencies and nonprofit organizations, when feasible, to leverage resources and maximize outcomes development. The City of Allentown will continue to utilize a wide range of state and local funding sources to leverage CDBG funds.

The City of Allentown has encouraged private developers and non-profit groups to participate in community revitalization efforts, particularly in the development of affordable housing. These groups may access such funding sources as the Federal Home Loan Bank or the Low-Income Housing Tax Credit Program to supplement other resources in developing affordable housing for the low income and special needs populations. Allentown will continue to leverage funds from the Pennsylvania Housing and Finance Agency, Department of Community and Economic Development, and other agencies to address the housing goal.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Several projects are expected to take place on public land and right of ways. These projects will address the need to **Improve Mobility and Accessibility**.

Discussion

Leveraging of ESG funds will be accomplished through a combination of grants and other fundraising efforts of the ESG subrecipients.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Rehabilitation of Owner-Occupied Homes	2015	2019	Affordable Housing		Create and Preserve Affordable Housing	CDBG: \$100,000 HOME: \$0	Homeowner Housing Rehabilitated: 3 Household Housing Unit
2	New Affordable Ownership Housing	2015	2019	Affordable Housing		Create and Preserve Affordable Housing	CDBG: \$20,000 HOME: \$200,000	Public service activities for Low/Moderate Income Housing Benefit: 110 Households Assisted Homeowner Housing Added: 4 Household Housing Unit Direct Financial Assistance to Homebuyers: 15 Households Assisted
3	New Affordable Rental Housing	2015	2019	Affordable Housing Public Housing		Create and Preserve Affordable Housing Support Public Housing	HOME: \$320,000	Rental units constructed: 50 Household Housing Unit Rental units rehabilitated: 2 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Homeless Support Activities	2015	2019	Affordable Housing Homeless		Reduce Homelessness	CDBG: \$20,000 ESG: \$198,373	Public service activities for Low/Moderate Income Housing Benefit: 100 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 27 Households Assisted Homeless Person Overnight Shelter: 1276 Persons Assisted
5	Economic Development/Job Creation	2015	2019	Economic Development		Build a Strong, Resilient and Diversified Economy	CDBG: \$30,000	Public service activities other than Low/Moderate Income Housing Benefit: 70 Persons Assisted Businesses assisted: 42 Businesses Assisted
6	Public Infrastructure Improvements	2015	2019	Non-Housing Community Development		Improve Mobility & Connectivity Improve Living Systems	CDBG: \$750,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 35000 Persons Assisted
7	Public Safety Goals	2015	2019	Public Safety		Improve Mobility & Connectivity Improve Living Systems	CDBG: \$500,000	Buildings Demolished: 8 Buildings Housing Code Enforcement/Foreclosed Property Care: 10 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Special Needs Goals (Non-Homeless)	2015	2019	Affordable Housing Non-Homeless Special Needs		Create and Preserve Affordable Housing Improve Access to Essential Services & Amenities	CDBG: \$20,000	Public service activities other than Low/Moderate Income Housing Benefit: 245 Persons Assisted
9	Public Services	2015	2019	Public Services		Improve Access to Essential Services & Amenities	CDBG: \$8,000	Public service activities other than Low/Moderate Income Housing Benefit: 582 Persons Assisted
10	Planning and Administration	2015	2019	Planning and Administration		Create and Preserve Affordable Housing	CDBG: \$461,039 HOME: \$146,335 ESG: \$14,877	Other: 1 Other

Table 58 – Goals Summary

Goal Descriptions

1	Goal Name	Rehabilitation of Owner-Occupied Homes
	Goal Description	To maintain and improve the condition of the housing stock to meet or exceed current code standards and to reduce overcrowding in housing units as defined in the City's Property Maintenance Code.

2	Goal Name	New Affordable Ownership Housing
	Goal Description	To make available affordable homeownership, within the existing housing stock (affordability is defined as spending no more than 35% of household income on housing related costs).
3	Goal Name	New Affordable Rental Housing
	Goal Description	To support the provision of decent, safe, and affordable rental housing with the City.
4	Goal Name	Homeless Support Activities
	Goal Description	To participate in a regional effort to contribute to meeting the shelter and service needs of homeless residents of the City, to assist residents of the City in imminent danger of becoming homeless, and to assist homeless residents find permanent housing, in accordance with the goals of the Continuum of Care.
5	Goal Name	Economic Development/Job Creation
	Goal Description	Economic Development/Job Creation Goals: The City of Allentown's primary goals for the community are to improve the standard of living and the economic opportunities for City residents, and to revitalize neighborhood commercial and industrial areas, as well as the central business district.
6	Goal Name	Public Infrastructure Improvements
	Goal Description	A primary goal for the City is the improvement of transportation and utility infrastructure to attract new business and industry, and improve the quality of life for residents.

7	Goal Name	Public Safety Goals
	Goal Description	<p>The primary goal of the City will continue to be ensuring a safe and secure environment in which residents can live, work, and play. Another goal is to reduce the crime and potential for crime, particularly in the. Objectives include the following:</p> <p>Create safe and secure residential neighborhoods and commercial districts.</p> <p>Enforce existing safety codes for areas in public rights-of-way and in residential neighborhoods.</p>
8	Goal Name	Special Needs Goals (Non-Homeless)
	Goal Description	<p>To participate in a regional effort to make available a full array of permanent housing opportunities for special needs populations</p> <p><u>Priorities for the Elderly/Frail Elderly Population</u></p> <p>Continue to support, locally and on a regional basis, activities that provide affordable housing for elderly and frail elderly residents at or below 80% of area median income.</p> <p>Priorities for Persons with Mental Illness</p> <p>Continue to support locally and on a regional basis, local agencies that provide supportive services and outreach programs to individuals with mental illness.</p> <p>Continue to support, on a regional basis, an increase in the supply of transitional and permanent supportive housing facilities for persons with mental illness and mental disabilities. These facilities should provide case management services to residents.</p> <p><u>Priorities: for Persons with Disabilities</u></p> <p>Continue to support, locally and on a regional basis, local agencies that provide supportive services and outreach programs to individuals and families who have</p> <p><u>Priorities for Persons with Alcohol and Drug Addiction</u></p> <p>Continue to support, locally and on a regional basis agencies that provide outreach programs to individuals with drug and alcohol problems.</p> <p><u>Priorities for Persons with HIV/ AIDS</u></p> <p>Continue to support, locally and on a regional basis, efforts that provide affordable housing to people living with HIV AIDS.</p> <p>Continue to support organizations that provide supportive services to people living with HIV AIDS</p>

9	Goal Name	Public Services
	Goal Description	<p>Increase the number of, and access to, recreational and educational program opportunities for residents of the Allentown. Examine the recreation/education needs of citizens living in the City.</p> <p>Work with recreation/education service providers to offer desired services Support the provision of recreational/educational programs, whenever possible</p> <p>Support the provision of convenient transportation to the desired activities</p> <p>Encourage recreation/education service providers to recognize other human service needs of participants in the recreation programs, and to make appropriate referrals to other social service agencies</p>
10	Goal Name	Planning and Administration
	Goal Description	Planning and Administration

Projects

AP-35 Projects – 91.220(d)

Introduction

In December 2019, City Council adopted a 10-year comprehensive and economic development plan known as **Allentown Vision 2030**. The City undertook a robust community engagement strategy to create, educate and inform the Plan. The outcomes of those sessions and the Plan itself have been integrated into this Consolidated Plan and the First Year Annual Action Plan.

The following is a summary of the investments being made by the City in this First Year Annual Action Plan:

Infrastructure projects to make accessibility (ADA) improvements to public walkways (\$352,203) and improve street lighting (\$400,000);

Programs to help renters become homeowners, including \$10,000 to the Community Action Committee of Lehigh Valley and \$10,000 to Neighborhood Housing Services of the Lehigh Valley;

Support for homeless programs and services totaling \$199,698, including: two programs (\$10,000 ea.) serving homeless youth for the Valley Youth House; operations support for homeless shelters \$116,560; and \$63,137 to rapidly rehouse homeless individuals.

Projects to address distressed and unsafe housing, include \$300,000 for the acquisition and resale of blighted properties and \$200,000 for demolition of unsafe structures.

More than three quarters of a million dollars (\$778,011) for construction of new housing, including an award of \$346,335 to create four new ownership units on North Street to the Housing Association and Development Corporation, and \$220,000 to build new 50 Allentown Housing Authority units, the creation of 13 new family rental units to the HDC Mid Atlantic Development Corporation (\$11,676), and the creation of 8 new family rental units to the Seton Hall Project (\$200,000);

Community action of the Lehigh Valley is doing targeting construction service currently working on 10th street to increase and preserve homeownership, and to develop neighborhood wealth for the benefit of the whole community (100,000). One hundred thousand dollars (\$100,000) to help existing homeowners eliminate hazardous and emergency conditions in their homes;

Assistance to families seeking affordable rental housing with an award to the Lehigh Valley for

Independent Living to help disabled families and \$10,000, and to North Penn Legal Services (\$30,000);

Investments in recreation facilities, including \$50,000 to connect existing parks and greenways and \$153,000 to make improvements and renovations to the YMCA;

Recreation program for youth support totaling \$57,500 for the Salvation Army (\$10,000), Community Bike Works (\$10,000), and afterschool programs at the Health Bureau, Alliance Hall of Allentown (\$7,500), Allentown YMCA (\$10,000), the Neighborhood Center (\$10,000) and the Baum School of Art (\$10,000);

Education and enrichment investments in YouthBuild (\$10,000) to help high school drop outs; the Boys & Girls Club; for educational programming at the Teen Services Center (\$10,000), scholarships to the Grace Montessori School (\$10,000), and programming at the Literacy Center (\$10,000);

Economic development projects including \$25,000 for small business and micro-enterprise startup training (Community Action Development Corporation of Allentown), \$10,000 for the Lehigh Valley Workforce Investment Board to provide employment training, employment assistance ; and essential social services, including mental health and nutrition programs at the Lehigh County Conference of Churches (\$10,000).

Projects

#	Project Name
1	Acquisition & Disposition of Substandard Properties
2	ADA Curb Cuts
3	Street Lighting
4	Youth Recreation Program (Allentown YMCA)
5	P.L.A.C.E. Program (Lehigh Valley Center for Independent Living)
6	English As A Second Language (The Literacy Center)
7	Daybreak (Lehigh County Conference of Churches)
8	Scholarship Program (Grace Montessori School)
9	The Baum School of Art
10	Community Action Financial Services (Community Action Committee of the Lehigh Valley)
11	Home Ownership Outreach Program (Neighborhood Housing Services of the Lehigh Valley)
12	Make Your M.A.R.K. (Boys and Girls Club of Allentown)
13	After School Program (The Neighborhood Center)
14	Synergy - (Valley Youth House)
15	Earn-a-Bike Program (Community Bike Works)
16	Allentown YMCA Renovation (Allentown YMCA)
17	Youth Enrichment Program (The Salvation Army)

#	Project Name
18	Allentown City Parks/Jordan Creek Greenway
19	Alliance Summer Recreation Program (Alliance Hall of Allentown, Inc.)
20	Great Beginnings (Valley Youth House)
21	Allentown Employment and Training Center (Lehigh Valley Workforce Development Board)
22	YouthBuild Allentown - HADC Education Program
23	Home Hazard Elimination Program
24	Demolition
25	Community Based Economic Development (Community Action Development Corporation of Allentown)
26	CDBG Program Administration
27	Fair Housing (North Penn Legal Services)
29	HOME Administration
31	Housing Association & Development Corporation - North Street
32	Allentown Housing Authority - Phase 2 of 3
34	ESG 2020
35	Community Action Committee of the Lehigh Valley
36	Seton Hall Project
37	HDC - MidAtlantic

Table 59 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

In allocating CDBG and HOME funds, the City funded activities that were deemed to have the greatest benefit to residents and were supportive of the strategies outlined in **Allentown Vision 2030** -- the City's 10-year Comprehensive and Economic Development Plan adopted by City Council in December 2019.

The system for establishing the priority for the selection of these projects is predicated upon the following criteria:

The primary obstacle to meeting underserved needs is the limited resources available to address identified priorities. When feasible, the City of Allentown partners with other public agencies and nonprofit organizations to leverage resources and maximize outcomes involving housing and community development activities. In addition, several other obstacles to meeting underserved needs include:

- Increased need for affordable housing and supportive services resulting from economic downturn - while budgets for projects are generally stretched in good economic conditions, the recent economic downturn has exacerbated these issues and concerns; and
- Increased foreclosures and unemployment - in addition to the community implications of the recent economic downturn are effects on a more individual basis, such as a high foreclosure

rate, the associated problem of poor credit and rising unemployment.

The City will continue to use federal funds for housing programs, including homeownership, to aid low- and moderate-income homeowners. Further, the City will continue to fund microenterprise and economic development initiatives that bring jobs to city residents.

AP-38 Project Summary

Project Summary Information

1	Project Name	Acquisition & Disposition of Substandard Properties
	Target Area	
	Goals Supported	New Affordable Ownership Housing New Affordable Rental Housing Public Safety Goals
	Needs Addressed	Create and Preserve Affordable Housing Improve Living Systems
	Funding	CDBG: \$300,000
	Description	Acquire, conduct property management, and disposal of blight properties throughout City.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Addressing threats to health and safety posed by blighted structures throughout the City will benefit the entire population of Allentown.
	Location Description	City-wide. Blighted properties throughout the City will be addressed by the proposed project.
	Planned Activities	Activities include acquisition, stabilization and/or demolition of blighted properties.
2	Project Name	ADA Curb Cuts
	Target Area	
	Goals Supported	Public Infrastructure Improvements
	Needs Addressed	Improve Mobility & Connectivity Improve Living Systems
	Funding	CDBG: \$500,000
	Description	City-wide curb cuts to comply with ADA requirements
	Target Date	12/31/2020

	Estimate the number and type of families that will benefit from the proposed activities	All 8,395 individuals in the 2018 American Community Survey One Year Estimate (2018) reported to have ambulatory difficulties will benefit from the proposed project.
	Location Description	City-wide. New ADA-compliant curb cuts will be installed on public walkways throughout Allentown.
	Planned Activities	Professional fees and construction costs to remove and replace sidewalk sections that transition to street level. New curbs and ramped sidewalks will comply with all applicable ADA codes.
3	Project Name	Street Lighting
	Target Area	
	Goals Supported	Public Infrastructure Improvements
	Needs Addressed	Improve Mobility & Connectivity Improve Living Systems
	Funding	CDBG: \$450,000
	Description	Street lighting, including Peter Lewnes - W 7th St + N Turner Street
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	The entire population of the City will benefit from the proposed street lighting improvements.
	Location Description	New lighting will be installed in the mixed-use area surrounding the intersection of North 7th Street and West Turner Street.
	Planned Activities	Professional fees and construction costs associated with the removal of existing and the installation of new street lighting.
4	Project Name	Youth Recreation Program (Allentown YMCA)
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Improve Access to Essential Services & Amenities
	Funding	CDBG: \$10,000
	Description	Youth after-school recreation program.
	Target Date	12/31/2020

	Estimate the number and type of families that will benefit from the proposed activities	Sixty (60) children low to moderate income aged 9 through 14 would benefit from the program.
	Location Description	425 South 15th Street, Allentown, PA
	Planned Activities	Community outreach program, through after school initiative that provides mentorship and a sense of belonging.
5	Project Name	P.L.A.C.E. Program (Lehigh Valley Center for Independent Living)
	Target Area	
	Goals Supported	Special Needs Goals (Non-Homeless) Public Services
	Needs Addressed	Improve Access to Essential Services & Amenities
	Funding	CDBG: \$10,000
	Description	The People Living in Accessible Community Environments Program advances the ability of persons with significant disabilities to live independently and productively in affordable and accessible housing of their choice.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	The program will serve forty-five (45) Allentown residents with disabilities, and/or their family members.
	Location Description	713 North 13th Street, Allentown, PA
	Planned Activities	LVCIL proposes the PLACE (People Living in Accessible Community Environments) program to provide housing counseling services to 45 low-income City residents with any disability, and their family members.
6	Project Name	English As A Second Language (The Literacy Center)
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Improve Access to Essential Services & Amenities
	Funding	CDBG: \$10,000

	Description	Teaches non-English-speaking low to moderate income individuals basic reading, writing skills to improve opportunities for sustainable employment, housing, and increased earnings.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Thirty five (35) residents low and moderate income residents
	Location Description	1132 Hamilton Street, Allentown
	Planned Activities	Enroll 35 residents, of whom 70% will reach a minimum of 50 instructional hours for outcomes post testing. Document at least 4.5 average gain on the Comprehensive Adult Student Assessment System, for post tested students. Document educational gain in post tested students through the completion of educational functioning levels at rates meeting or exceeding the current outcomes.
7	Project Name	Daybreak (Lehigh County Conference of Churches)
	Target Area	
	Goals Supported	Homeless Support Activities Public Services
	Needs Addressed	Reduce Homelessness Improve Access to Essential Services & Amenities
	Funding	CDBG: \$10,000
	Description	An adult drop-in center for the mentally ill and those recovering from addictions, providing services such as meals, supportive, counseling and recreation in a protective environment.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Two hundred (200) residents with special needs, HIV/AIDS, and/or disabilities.
	Location Description	457 West Allen Street, Allentown, PA

	Planned Activities	Daybreak is a weekday drop-in center that gives people living with mental illness or physical disabilities and those struggling with addiction or HIV/AIDS, as well as the neighborhood's elderly, a place to belong. Daybreak serves three balanced meals each weekday. Staff teach life skills and work with members to provide stability and help them reach their full potential.
8	Project Name	Scholarship Program (Grace Montessori School)
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Improve Access to Essential Services & Amenities
	Funding	CDBG: \$10,000
	Description	Scholarships for low/moderate income children, ages 18 months to six years, to attend pre-school.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	The program will benefit 6 at risk students whose families are low income.
	Location Description	814 West Linden Street, Allentown, PA
	Planned Activities	The program will provide high quality education and childcare to children of Allentown's economically disadvantaged neighborhoods. Grace Montessori School is located in the heart of the downtown area. The community outreach program, through after school initiative, provides mentorship and belonging.
9	Project Name	The Baum School of Art
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Improve Access to Essential Services & Amenities
	Funding	CDBG: \$4,766
	Description	After school arts program for Focus Area low/moderate income youth
	Target Date	12/31/2020

	Estimate the number and type of families that will benefit from the proposed activities	The project will serve thirty (30) elementary school students from eight different local schools.
	Location Description	510 West Linden Street, Allentown, PA
	Planned Activities	The program will provide program participants with twenty (20) hours of art education during the school year.
10	Project Name	Community Action Financial Services (Community Action Committee of the Lehigh Valley)
	Target Area	
	Goals Supported	New Affordable Ownership Housing
	Needs Addressed	Create and Preserve Affordable Housing
	Funding	CDBG: \$100,000
	Description	Includes individual and group counseling, which prepares potential low/moderate income homebuyers for the homebuying process.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	One hundred ten (110) low- and moderate-income residents will benefit from the proposed activity.
	Location Description	1337 East 5th Street, Allentown, PA
	Planned Activities	Homeownership counseling program, offers a number of programs to help Lehigh Valley families achieve homeownership and avoid foreclosure.
11	Project Name	Home Ownership Outreach Program (Neighborhood Housing Services of the Lehigh Valley)
	Target Area	
	Goals Supported	New Affordable Ownership Housing Public Services
	Needs Addressed	Create and Preserve Affordable Housing Improve Access to Essential Services & Amenities
	Funding	CDBG: \$10,000
	Description	Individual counseling program to assist low/moderate income residents purchase a home.

	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	The program will serve fifteen (15) low and moderate-income first-time homebuyers from Allentown.
	Location Description	239 North 10th street
	Planned Activities	Assisting in down payment assistance, this program provides affordable housing solutions to low to moderate income families to become first time homeowners.
12	Project Name	Make Your M.A.R.K. (Boys and Girls Club of Allentown)
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Improve Access to Essential Services & Amenities
	Funding	CDBG: \$10,000
	Description	Motivational learning and tutoring program for low/moderate income youth to be offered at the Teen Services Center on North Seventh Street.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	The program will serve forty-two (42) students between 2nd and 12th grade.
	Location Description	641 North Seventh Street, Allentown, PA
13	Planned Activities	Provide disadvantaged, school-aged youth in the community with individualized, prescriptive curriculum reading/language arts/English and math designed to improve areas of academic weakness.
	Project Name	After School Program (The Neighborhood Center)
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Improve Access to Essential Services & Amenities
	Funding	CDBG: \$10,000
	Description	Provides structured programs for low/moderate income youth in the Seventh Street neighborhood

	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Twenty (20) low to moderate income students will benefit from the proposed project.
	Location Description	435 north 7th Street Allentown, PA 18102
	Planned Activities	To address the need for positive role models, for safe care, for discussions regarding values and decision making, and to assist in preventing further youth involvement in gangs.
14	Project Name	Synergy - (Valley Youth House)
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Improve Access to Essential Services & Amenities
	Funding	CDBG: \$10,000
	Description	Street outreach program for homeless youth.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately one hundred (100) homeless youth will benefit from the program.
	Location Description	Services are deployed to areas where homeless youth are known to congregate.
	Planned Activities	The program will conduct street outreach in the City of Allentown using 4-wheel drive vehicles, bicycles, and foot patrols. Outreach workers visit places where homeless youth are known to congregate or where client and community referrals suggest targeted youth may be located. They also meet youth upon request.
15	Project Name	Earn-a-Bike Program (Community Bike Works)
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Improve Access to Essential Services & Amenities
	Funding	CDBG: \$10,000

	Description	An extensive bicycle mechanics and safety program for low/moderate income children, ages nine through 17 where full participation earns them a bicycle.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	The program will serve approximately fifty (50) children age nine thru seventeen.
	Location Description	235 North Madison Street, Allentown, PA
	Planned Activities	The program teaches life lessons through bicycles to the youth of Allentown who could benefit most. Youth development programs that allow Allentown's younger residents to learn mechanical and life skills while developing relationships caring adults.
16	Project Name	Allentown YMCA Renovation (Allentown YMCA)
	Target Area	
	Goals Supported	
	Needs Addressed	Improve Access to Essential Services & Amenities
	Funding	CDBG: \$153,000
	Description	Upgrade and remodel deteriorating childcare facility.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Thirty-eight (38) low and moderate income families will benefit from the project.
	Location Description	425 15th St, Allentown, PA
	Planned Activities	Create an environment that reinforces quality, compliance, research shows quality early childhood environment increase individual learning skills and school readiness. Increase capacity by 6%, increase supervision of all childhood teachers and participants, expansion of services to the community.
17	Project Name	Youth Enrichment Program (The Salvation Army)
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Improve Access to Essential Services & Amenities

	Funding	CDBG: \$10,000
	Description	After school education and recreation program for youth.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	One hundred forty (140) children will benefit from the program.
	Location Description	144 North 8th Street, Allentown, PA
	Planned Activities	The program will offer LMI children with academic and recreational activities, through health education, reading revival, dance and cooking.
18	Project Name	Allentown City Parks/Jordan Creek Greenway
	Target Area	
	Goals Supported	Public Infrastructure Improvements
	Needs Addressed	Improve Mobility & Connectivity
	Funding	CDBG: \$50,000
	Description	Connecting trails of City parks.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	The entire population of Allentown will benefit from the proposed project.
	Location Description	Improvements will be concentrated around the Jordan Creek Greenway.
	Planned Activities	Installation of critical sections of missing trail way to connect the Jordan Creek Greenway with other trails in the City.
19	Project Name	Alliance Summer Recreation Program (Alliance Hall of Allentown, Inc.)
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Improve Access to Essential Services & Amenities
	Funding	CDBG: \$5,500
	Description	Summer program including recreation, lunch, snacks, and health promotion for children ages 7 - 13.

	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	The program will serve approximately 200 children aged 7 to 12 years old.
	Location Description	245 North 6th Street, Allentown, PA
	Planned Activities	Collaborative effort by several organizations providing arts and crafts, swimming, field trips, breakfast and lunch to inner city children.
20	Project Name	Great Beginnings (Valley Youth House)
	Target Area	
	Goals Supported	New Affordable Rental Housing Public Services
	Needs Addressed	Create and Preserve Affordable Housing Improve Access to Essential Services & Amenities
	Funding	CDBG: \$10,000
	Description	A program which provides housing and services to pregnant and parenting homeless women, ages 16 - 21.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Seventeen (17) expecting mothers between the ages of 16 and 21 will be served by the program.
	Location Description	747 E. Tilghman Street
	Planned Activities	Great Beginnings is designed for pregnant and parenting homeless youth between the ages of 16 and 21.
21	Project Name	Allentown Employment and Training Center (Lehigh Valley Workforce Development Board)
	Target Area	
	Goals Supported	Public Services Economic Development/Job Creation
	Needs Addressed	Build a Strong, Resilient and Diversified Economy Improve Access to Essential Services & Amenities
	Funding	CDBG: \$10,000

	Description	Program to assist residents find jobs.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	The program will serve fifty (50) low and moderate income individuals.
	Location Description	555 Union Boulevard, Allentown, PA
	Planned Activities	Providing strategic close to customer workforce employment and training services to low and moderate income individuals.
22	Project Name	YouthBuild Allentown - HADC Education Program
	Target Area	
	Goals Supported	Public Services Economic Development/Job Creation
	Needs Addressed	Build a Strong, Resilient and Diversified Economy Improve Access to Essential Services & Amenities
	Funding	CDBG: \$10,000
	Description	Educational and vocational training for high school dropouts.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	The program will serve twenty (20) youth that have dropped out of high school.
	Location Description	513-515 Chew Street, Allentown, PA
	Planned Activities	Provide case management, GED preparation coursework, construction skill instruction to the YouthBuild Students, to prepare them for job opportunities by giving the youth participants a skill.
23	Project Name	Home Hazard Elimination Program
	Target Area	
	Goals Supported	Rehabilitation of Owner-Occupied Homes
	Needs Addressed	Create and Preserve Affordable Housing
	Funding	CDBG: \$100,000
	Description	Elimination of conditions detrimental to health or safety within owner occupied properties

	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	The program will address hazardous conditions in the homes of low- and moderate-income Allentown residents.
	Location Description	The program will be offered throughout the City of Allentown.
	Planned Activities	Delivery and construction costs related to the removal of hazardous living conditions in the homes of Allentown residents.
24	Project Name	Demolition
	Target Area	
	Goals Supported	Public Safety Goals
	Needs Addressed	Create and Preserve Affordable Housing Improve Living Systems
	Funding	CDBG: \$200,000
	Description	Emergency demolition of hazardous and blighted properties.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	All residents of the City of Allentown will benefit from the proposed activity.
	Location Description	Homes targeted for demolition will be city-wide.
	Planned Activities	Professional and hard costs related to demolition of hazardous and blighted properties. Approximately five (5) buildings will be demolished.
25	Project Name	Community Based Economic Development (Community Action Development Corporation of Allentown)
	Target Area	
	Goals Supported	Economic Development/Job Creation
	Needs Addressed	Build a Strong, Resilient and Diversified Economy
	Funding	CDBG: \$25,000

	Description	Provides Start Your Business Program, a series of 17 weekly classes in which prospective entrepreneurs will learn to start and run a micro-enterprise successfully. Project to create low/moderate jobs within the City of Allentown.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Thirty (30) prospective business owners and twelve (12) existing business owners in creating, retaining and/or expanding their business through the Start Your Business Program and technical assistance.
	Location Description	523-525 North 7th Street, Allentown, PA
	Planned Activities	Provides business training and technical assistance, facilitates start-up financing and assists with research for the creation of new businesses.
26	Project Name	CDBG Program Administration
	Target Area	
	Goals Supported	Planning and Administration
	Needs Addressed	
	Funding	CDBG: \$461,039
	Description	General Management, Oversight and Coordination (City of Allentown, Department of Community and Economic Development). A portion of the salaries and fringe benefits of six employees, as well as operating costs for overall program management, coordination, monitoring and evaluation.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable.
	Location Description	Not applicable.
27	Planned Activities	This activity will support the administration of the City's CDBG program. Funds will be used for salary and fringes of City employees dedicated to the administration of the program. Costs may also include the hiring of consultants, advertising and office expenses.
	Project Name	Fair Housing (North Penn Legal Services)
	Target Area	

	Goals Supported	New Affordable Ownership Housing New Affordable Rental Housing Public Services
	Needs Addressed	Create and Preserve Affordable Housing Improve Access to Essential Services & Amenities
	Funding	CDBG: \$30,000
	Description	Promotes fair housing within the City of Allentown.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Thirty (30) low and moderate income households experiencing obstacles to fair housing choice.
	Location Description	559 Main Street, Allentown, PA
	Planned Activities	Fair housing coordinator position for Lehigh Valley Housing Project. Coordinating fair housing training and outreach events, distribution of fair housing material work on fair housing training and outreach events.
28	Project Name	HOME Administration
	Target Area	
	Goals Supported	Planning and Administration
	Needs Addressed	Create and Preserve Affordable Housing
	Funding	HOME: \$97,557
	Description	Administration (City of Allentown, Department of Community and Economic Development).
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	Includes cost of overall program management, coordination, monitoring and evaluation.
	Project Name	Housing Association & Development Corporation - North Street

29	Target Area	
	Goals Supported	New Affordable Ownership Housing
	Needs Addressed	Create and Preserve Affordable Housing
	Funding	HOME: \$34,633,535
	Description	New construction of four (4) town homes. This project includes both HOME entitlement funds and CHDO reserve.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	The project will serve four (4) low and moderate income families.
	Location Description	North Street, Allentown, PA
	Planned Activities	New construction of townhomes.
30	Project Name	Allentown Housing Authority - Phase 2 of 3
	Target Area	
	Goals Supported	New Affordable Rental Housing
	Needs Addressed	Create and Preserve Affordable Housing Support Public Housing
	Funding	HOME: \$220,000
	Description	New construction - Martin Luther King
	Target Date	12/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	The project will support the Allentown Housing Authority's project to create fifty (50) new units of affordable housing. This is phase two of a three phase project.
	Location Description	1338 West Allen Street, Allentown, PA
	Planned Activities	The project will support the Allentown Housing Authority's project to create fifty (50) new units of affordable housing.
31	Project Name	ESG 2020
	Target Area	
	Goals Supported	Homeless Support Activities Planning and Administration

	Needs Addressed	Reduce Homelessness
	Funding	ESG: \$194,268
	Description	This Project includes all uses of ESG funds for the Program Year -- Shelter Support, Rapid Re-housing and Administration.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	<p>The Allentown Rescue Mission's Shelter Support project will serve 926 homeless men.</p> <p>The Community Action Committee of Lehigh Valley's Sixth Street Shelter will serve one hundred (100) homeless families for a total of 350 individuals.</p> <p>Lehigh Conference of Churches (RRH) will serve 10 homeless individuals.</p> <p>The Salvation Army's Hospitality House will provide emergency housing to 169 homeless women and children.</p>
	Location Description	<p>Allentown Rescue Mission: 355 Hamilton Street</p> <p>Sixth Street Shelter (CACLV): 219 North 6th Street</p> <p>Lehigh Conference of Churches (RRH): 457 West Allen Street</p>
	Planned Activities	<p>The Allentown Rescue Mission will use \$37,653.67 for the payment of operating costs for its emergency shelter.</p> <p>CACLV will use \$37,653.67 for the payment of operating costs for its emergency shelter.</p> <p>Lehigh Conference of Churches Rapid Rehousing Program will use \$63,137.10.</p> <p>The Salvation Army will use \$41,253.46 for operation of the Hospitality House emergency shelter.</p> <p>The City of Allentown will use \$14,570.10 for administration of the Emergency Solutions Grant.</p>
32	Project Name	Community Action Committee of the Lehigh Valley
	Target Area	
	Goals Supported	Rehabilitation of Owner-Occupied Homes
	Needs Addressed	Create and Preserve Affordable Housing
	Funding	HOME: \$100,000

	Description	Rehabilitation of 9 new affordable apartment rentals and a commercial space.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	The program will serve 9 low- and moderate-income households.
	Location Description	City-wide.
	Planned Activities	Soft and hard costs associated with the rehabilitation of owner-occupied housing.
33	Project Name	Seton Hall Project
	Target Area	
	Goals Supported	New Affordable Rental Housing
	Needs Addressed	Create and Preserve Affordable Housing
	Funding	HOME: \$200,000
	Description	Rehabilitation
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	9 low- and moderate-income families will benefit from the proposed project.
	Location Description	402 W Chew St, Allentown, PA
	Planned Activities	Rehabilitation of Seton Hall into 9 new affordable apartment rentals and a commercial space.
34	Project Name	HDC - MidAtlantic
	Target Area	
	Goals Supported	New Affordable Rental Housing
	Needs Addressed	Create and Preserve Affordable Housing
	Funding	HOME: \$11,677
	Description	Matching funds for a Low Income Housing Tax Credit project.
	Target Date	12/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	The project will benefit an undetermined number of low and moderate income households.
	Location Description	4-6 W King St #4, Lancaster, PA 17603
	Planned Activities	Funds will be used as a match for Low Income Housing Tax Credits financing.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Not applicable. This Plan does not use geography to determine funding allocation priorities. Nor has the City has opted to create Target Areas as defined by the regulation for the distribution of entitlement funds.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Allentown expects to focus its CDBG and HOME entitlement funds towards improving the quality of life in city neighborhoods for extremely low, very low, and low income households, and to preserve and increase the stock of affordable owner and renter housing units. The following objectives have been established:

7. Expand homeownership – develop new homeownership opportunities through first-time homebuyer assistance, new construction and substantial rehabilitation of blighted housing.
8. Preserve existing housing – provide assistance to lower income homeowners to rehabilitate their homes to meet code standards.
9. Expand rental housing – provide assistance to developers to construct new rental housing or conversion of non-residential facilities into housing.
10. Support the actions of the City of Allentown Housing Authority to improve public housing.
11. Support the actions of developers (non-profit and for-profit) seeking funds to develop housing to address the needs of persons with disabilities and the elderly.
12. Support the development of new permanent supportive housing for persons who need more than just an apartment to end the cycle of homelessness.

One Year Goals for the Number of Households to be Supported	
Homeless	2
Non-Homeless	191
Special-Needs	0
Total	193

Table 60 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	2
The Production of New Units	56
Rehab of Existing Units	10
Acquisition of Existing Units	125
Total	193

Table 61 - One Year Goals for Affordable Housing by Support Type

Discussion

AP-60 Public Housing – 91.220(h)

Introduction

The Allentown Housing Authority (AHA) currently owns and manages 987 conventional public housing units, primarily within 10 separate developments located throughout the City of Allentown. Almost all of the public housing units are occupied, with yearly turnover ranging from 2 to 23 units among the 10 developments. This total includes 79 scattered site units located throughout the City of Allentown.

The Public Housing Authority Survey in the Unique Grantee Appendix shows the target population of each development as well as the total units, year built, occupancy rate, and annual unit turnover. Sixty-five percent of the units are designated for elderly tenants overall. The overall annual turnover rate is low, approximately 15% of the units, and the occupancy rates range from 97 to 99%.

The AHA has converted 205 conventional public housing units through the HUD Rental Demonstration Program. Seventy (70) units at Cumberland Gardens received Project Based Vouchers and 135 units at Overlook Park receive Project Based Rental Assistance (PBRA).

In addition, AHA owns and manages 95 units that were acquired and rehabilitated through the federal Section 8 Substantial Rehabilitation Program. These units are also scattered throughout the City. The major unmet need in the City of Allentown reported by AHA was for additional family housing units with a varied bedroom mix. Also, adequate on-site facilities for community programs are seen as a great need.

Overlook Park

There are an additional 79 rental units that are eligible for Section 8 Housing Choice Vouchers at Overlook Park. The first two phases of Overlook Park are coming up on the end of their initial 15-year Low Income Housing Tax Credit (LIHTC) compliance period. Overlook Park was part of a 2005 HUD award that AHA received. This \$20 million HOPE VI Revitalization grant was provided to demolish and rebuild the Hanover Acres and Riverview Terrace (HART) public housing developments and introduce a new mixed-income model of affordable housing and community revitalization to the City of Allentown. Demolition for the project began in June 2006 with the 322 barracks-style Hanover Acres. Hanover Acres was opened in 1939 as Pennsylvania's first public housing for low income workers. AHA temporarily relocated all tenants prior to the demolition. A total of 421 public housing units at Hanover Acres and the adjacent Riverview Terrace have been replaced with 269 rental units for low- and moderate-income residents, a 17,000 square foot community center, a greenway, and park. The project is a public-private partnership between AHA, a private developer, and the City, which contributed funding through its federal HOME Investment Partnerships Program funding. The rental units are a mix of two-, three-, and four-bedroom townhouses and twin homes. Fifty-three (53) detached homes were built and sold to low- and moderate-income residents. AHA procured the Catholic Social Agency to provide case management and Community Supportive Services, and provide management services. AHA leveraged approximately

\$40 million from its partners toward the total cost of the project.

Actions planned during the next year to address the needs to public housing

Over the past several years, the focus of the AHA has been on making physical upgrades to all its family and elderly public housing developments through the annual Capital Fund grant (approximately \$1.5 million annually). Ongoing repairs and modernization activities include kitchen and bathroom modernizations, new HVAC and water improvements, new sidewalks, curbs, and roofing. Plans are to request funding for elderly services as well as new housing construction funding from the federal government in the future.

A major rehabilitation was initiated in 2012 at the Cumberland Gardens development. Several needs have been identified by the AHA and public housing residents. Safety issues have begun to be addressed by the installation of overhead surveillance cameras at three building sites. City police have been cooperative in their understanding of the increased problems experienced by public housing residents. Another need is more off street parking in several of the developments, as well as generally reduced density within the public housing neighborhoods.

The rehabilitation included dividing the development into three phases. Phase 1, 74 units; Phase 2, 70 units and Phase 3, 56 units. The AHA and its development partner successfully utilized four and nine percent Low Income Housing Tax Credits, City of Allentown HOME Funds, ARRA Stimulus Funds and LIHTC Equity to renovate all units. A small number of units were demolished and replaced with new units containing handicap accessible units. In addition, the Community Building was renovated.

Five of the seven public housing developments currently have a resident council. The resident councils provide input and are primarily involved in planning for, and feedback on, renovation/modernization needs of the developments. The resident councils attend regular meetings and take part in the planning processes for both the 5 year and annual Public Housing Authority (PHA) plans that are submitted to HUD.

The AHA recognizes the inherent difficulty in keeping the resident councils engaged. It plans to seek involvement and support of the councils by scheduling regular meetings with the Director of Social Services or AHA Executive Director.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The AHA recognizes the inherent difficulty in keeping the resident councils engaged. It plans to seek involvement and support of the councils by scheduling regular meetings with the AHA Executive Director. It is anticipated that by employing this strategy, residents will be able to have a direct impact

on decisions and projects related to improving their living environments.

Gross Towers and Towers East currently have a resident council. The resident councils provide input and are primarily involved in planning for, and feedback on, renovation/modernization needs of the developments. The resident councils attend regular meetings and take part in the planning processes for both the 5-year and annual Public Housing Authority (PHA) plans that are submitted to HUD.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not Applicable

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

Homelessness is a complex issue that, in addition to housing cost and availability, often involves problems of addiction, mental health, domestic violence, health, and poverty. It is now believed that these problems can best be reduced by partnering social service organizations with regional governments and communities so that maximum coordination of all housing and support services is ensured.

Federal funding that addresses homelessness requires communities and organizations to formally work together to develop a "Continuum of Care" (CoC) process to address homelessness at all levels. Since 2005, the City of Allentown has participated in the regional CoC process, led by the Eastern Pennsylvania CoC and coordinated at a local level by the Lehigh Valley Regional Homeless Advisory Board (RHAB). The Eastern PA CoC is one of two regional CoC's in Pennsylvania that cover non-entitlement portions of the state in order to receive homeless assistance from HUD. Within the region, the Lehigh Valley RHAB encompasses Lehigh and Northampton Counties, the cities of Allentown, Bethlehem and Easton. Each year, the Lehigh Valley RHAB applies for competitive federal grants for the region to provide homeless housing and support services.

The Commonwealth of Pennsylvania's Department of Community and Economic Development (DCED) is the Collaborative Applicant for the Eastern PA CoC. The Collaborative Applicant is the eligible applicant (State, unit of local government, private, nonprofit organization, or public housing agency) designated by the CoC to: 1) Collect and submit the required CoC Application information for all projects the CoC has selected for funding, and 2) Apply for CoC planning funds on behalf of the CoC. The Eastern PA CoC (of which LV RHAB is a member) is currently an unincorporated organization that serves as the primary decision-making group for the CoC process. The CoC's responsibilities include ensuring representation of key stakeholders; setting the agenda for full CoC planning meetings; conducting the annual homeless single Point-in-Time count; overseeing the various subcommittees and working groups; completing the annual CoC application; and assisting in reviewing programs, activities, data, and all other efforts that will eliminate homelessness and improve the well-being of homeless persons and families in Eastern Pennsylvania region.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

In Lehigh County in 2019, 28 people were identified as chronically homeless during the annual Point in Time Count. The City has identified the chronically homeless in Allentown as mainly the childless adult

group with serious disabling conditions.

Outreach to connect services to the homeless populations is provided by the Linkage Program of the Lehigh County Conference of Churches and various agencies who reach out to homeless veterans. In addition to emergency shelter and transitional housing resources, there are a number of Rapid Rehousing and Permanent Supportive Housing resources available to residents of Allentown experiencing homelessness, that are accessible through Connect to Home, the CoC's Coordinated Entry system. Additionally, the non-profit organization Turning Point of Lehigh Valley operates a Domestic Abuse Hotline that is likewise available on a 24/7 basis. Valley Youth House provides Street Outreach services, and other emergency situations require the use of the County 911 system.

Addressing the emergency shelter and transitional housing needs of homeless persons

Federal funding that addresses homelessness requires communities and organizations to formally work together to develop a "Continuum of Care" (CoC) process to address homelessness at all levels. Since 2005, the City of Allentown has participated in the regional CoC process, led by the Eastern Pennsylvania CoC and coordinated at a local level by the Lehigh Valley Regional Homeless Advisory Board (RHAB). The Eastern PA CoC is one of two regional CoC's in Pennsylvania that cover non-entitlement portions of the state in order to receive homeless assistance from HUD. Within the region, the Lehigh Valley RHAB encompasses Lehigh and Northampton Counties, the cities of Allentown, Bethlehem and Easton.

The shelters and transitional housing in Allentown:

- Community Action Committee of the Lehigh Valley - 6th Street Shelter (ES)
- Community Action Committee of Lehigh Valley - Turner St. Apartments (TH)
- Salvation Army Emergency Shelter (ES)
- Lehigh Rescue Mission (ES)
- Lehigh Rescue Mission Christian Living and Values Transitional Program(TH)
- Turning Point of the Lehigh Valley (Domestic Violence) (TH)

In order to meet the City's Goals to participate in a regional effort to contribute to meeting the shelter and service needs of homeless residents of the City, to assist residents of the City in imminent danger of becoming homeless, and to assist residents in a continuum to find permanent housing, the City has budgeted \$193,373 from the FY2020 Emergency Solutions Grant funds for the support of the City's four (4) emergency shelters and a rapid re-housing program. Activities implemented by the City of Allentown, The CACLV Sixth Street Shelter, The Allentown Rescue Mission, The Salvation Army and the Lehigh Conference of Churches. The City anticipates assisting approximately 100 persons through the shelter assistance.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to

permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Finding available, affordable units is the challenge most households face in their efforts to move from shelter or transitional to permanent housing. Housing supply is limited and is often priced higher than many households can afford. Affordable units may not be safe or meet minimum housing code standards. The City is working to address the availability and condition of affordable housing and provides a substantial amount of its CDBG and HOME funds to housing. Several projects in this year's action plan directly support the creation and rehabilitation of housing as well as prepare families for homeownership.

The LVRHAB encourages shelters and transitional housing providers to access the listing of affordable units on PHFA's housing locator website (<https://www.phfa.org/renters/>). The LVRHAB will continue to track the length of time households remain homeless and work to reduce that time.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The LVRHAB is participating with other state CoCs through the PA Homeless Steering Committee to develop partnerships with state agencies that operate programs that discharge individuals to homelessness. Progress has been made with several agencies. Discharge planning by youth serving agencies includes steps to prepare youth for discharge from foster care and penal institutions. Mental health discharge is coordinated with the County Office of Mental Health. The Departments of Corrections and Public Welfare are working to implement a new protocol to ensure that those leaving penal institutions are enrolled in Medical Assistance through the COMPASS application process. This process also will tie into Food Stamps and cash assistance shortly. Discharge from health care is more difficult due to the special needs and short time frame involved in discharge. The PA Homeless Steering Committee is working with the Department of Health, Division of Acute and Ambulatory Care to research and establish protocols.

Coordination of services and local advocacy ensures that families that are already enrolled in one system of care are properly referred to other agencies providing appropriate services. The implementation of

the 2-1-1 system will help expand the degree of coordination.

This Action Plan includes several projects to help individuals and families avoid becoming homeless, including legal services to halt evictions and address housing discrimination.

Discussion

AP-70 HOPWA Goals– 91.220 (I)(3)**Not Applicable**

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	0
Tenant-based rental assistance	0
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	0

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

A property owner in the City of Allentown will pay real estate taxes to the City, Lehigh County, and the Allentown School District. Each governing body determines its own tax rate; the actual tax paid is based on this rate multiplied by the assessed value of the property. The assessed value of the property is determined by Lehigh County. The most recent assessment was completed in 1990.

Since the City is limited to a one-percent earned income tax under State law, it is heavily dependent upon the real estate tax for revenue. In fact, as the largest source of revenue, the real estate tax provides more than three times the revenue to the City as the earned income tax. The City's tax rate is not excessive compared to other cities of a similar size; however, in comparison to suburban municipalities, Allentown homeowners pay a higher tax rate. This situation wherein the City must disproportionately increase real estate taxes relative to the surrounding municipalities effectively raises costs for purchasing land and developing affordable housing.

In the codified ordinances of the City of Allentown, it states that the purpose of the zoning ordinance "...is the promotion of the public health, safety, morals, and/or general welfare by":

- Encouraging the most appropriate use of land
- Preventing the overcrowding of land
- Conserving the value of land and buildings
- Lessening the congestion of traffic on the roads
- Avoiding undue congestion of population
- Providing for adequate light and air
- Securing safety from fire, flood, and other dangers
- Facilitating adequate provision for transportation, water supply, sewage disposal, draining, school, parks, and other public facilities
- Giving reasonable consideration, among other things, to the character of districts and their peculiar suitability for particular uses
- Giving effect to the policies and proposals of the Comprehensive Plan as approved by the City Planning Commission and adopted by Council

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

In 2019, Lehigh County, Northampton County, and the cities of Allentown, Bethlehem, and Easton agreed to prepare a joint Regional Analysis of Impediments to Fair Housing Choice. This Regional AI is an

endeavor to streamline the Lehigh Valley region's approach to fair housing and to identify and address impediments to fair housing choice that often do not strictly follow jurisdictional boundaries. By conducting this regional analysis, communities across the Lehigh Valley will be able to promote fair housing choices for all persons, provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities.

As of the submission date of this Consolidated Plan, the Regional Analysis of Impediments to Fair Housing Choice had not yet been finished. Once it has been reviewed and approved, this Plan will be amended to include the findings and recommendations of the Regional AI.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

The City has developed the following actions planned to: address obstacles to meeting unserved needs, foster and maintain affordable housing, reduce lead based paint hazards, reduce the number of poverty level families, develop institutional structures, and enhance coordination between public and private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

The primary obstacle to meeting underserved needs is the limited resources available to address identified priorities. When feasible, the City of Allentown partners with other public agencies and nonprofit organizations to leverage resources and maximize outcomes involving housing and community development activities. The City will continue to use federal funds for housing programs, including homeownership, to aid low- and moderate-income homeowners. Further, the City will continue to fund microenterprise and economic development initiatives that bring jobs to city residents.

Also, during the upcoming program year, the City will continue to search for other funding opportunities to assist in meeting underserved needs. Information will be passed along to appropriate partners if the funding fits their respective missions. The City will also offer technical assistance to review these grant applications, if requested.

Actions planned to foster and maintain affordable housing

The City will continue to use CDBG and HOME funds for rehabilitation programs, as described in earlier sections, and to encourage the creation of new affordable housing as opportunities arise. The City's use of CDBG funds to prepare families for homeownership will also improve affordable housing options. Further, the City has a strong code enforcement program and rental property inspection program that is used to prevent blight and improve the housing stock.

Actions planned to reduce lead-based paint hazards

Due to the age of the housing stock, particularly the stock available to low- to moderate- income households, Allentown's Bureau of Health has been active in preventing lead poisoning for children for over 35 years. The Bureau seeks to identify children at risk of lead poisoning, assures medical treatment and case management for the children and their families, and assures that lead hazard reduction activities are conducted in premises where environmental investigations reveal excessive lead levels. Historically, the Health Bureau actively screened children for lead poisoning and provides outreach and presentations at family centers, safety carnivals, health fairs, and child care centers. The Bureau collaborates with area hospitals and family health centers to provide and promote lead screenings. Because of extensive budget cuts, however, the Health Bureau's outreach and testing have been

severely reduced in recent years.

The City will continue to ensure that all housing rehabilitation work is done in accordance with all lead regulations, with housing units certified as lead-safe upon completion. All contractors working on federally-funded programs must have the appropriate lead certifications and that documentation is kept on file in the City.

The Bureau of Building Standards and Safety will continue to coordinate with the City's Bureau of Health. If the Bureau of Health identifies families with a lead poisoned child, the Bureau of Building Standards and Safety will offer funds to rehabilitate the unit to abate the lead hazards. It is anticipated that four owner occupied properties and eight rental units will be assisted.

The City was recently awarded \$460,000 in funds from Commonwealth of Pennsylvania to address lead hazards in homes. Approximately twenty (20) homes will be addressed by the program. This program continues the success of the City's recently concluded US Department of HUD Lead Hazard Reduction Demonstration Grant. The grant was successful in removing lead hazards from fifty-three (53) homes where a child under age six was found to have an elevated blood lead level – three more than the 50-unit target. Thirty-three (33) very low-income families and nineteen (19) low-income families were assisted by the program. Eleven (11) of the assisted properties were owner-occupied and the remaining forty-two (42) were rentals. The grant was also successful in training and certifying eighteen (18) contractors with the Lead Abatement Supervisor certification. Allentown's Community Health Specialist completed more than fifty (50) outreach events reaching over 2,000 families with education, support and testing referrals. The Community Health Specialist conducted 138 home assessments where children under six had an elevated blood lead level. Assessments included a lead risk assessment, education and cleaning supplies. The City was also able to purchase a lead blood analyzer with the grant to help increase the rate of testing in Allentown.

Actions planned to reduce the number of poverty-level families

The City believes that the most effective method of lowering the number of households living in poverty is to assist them in developing the skills necessary to become more independent and self-sufficient.

The most obvious examples of this philosophy are the references throughout the Consolidated Plan to meeting the supportive needs of the homeless, those threatened with homelessness, and those with special needs. In the case of the homeless, the purpose of the supportive services is to assist them in dealing with the problems that led to their homelessness. Hopefully, their stay in a shelter facility will serve as a transition to permanent housing and a starting point towards developing their independence and self-sufficiency. The City will use ESG funds to support the operating budget of emergency shelters and create additional rapid re-housing vouchers. This will allow the sheltering organizations to provide more intensive social services to the participants in their programs. In addition, whenever possible, the City will assist the shelter providers in obtaining financial assistance to meet the physical needs of the

sheltering facilities.

Previously, it was established that those threatened with homelessness usually are of extremely low income. They are also often in need of a wide range of social services to remove the threat of homelessness and to develop the skills necessary to increase the independence and self-sufficiency. Each year, the City budgets a portion of its CDBG funds to the provision of human services, largely to assist extremely low-income individuals and families.

For persons with special needs who have a permanent disability, it may not be practical to expect a reduction in the number of households with incomes below the poverty line, depending on their level of disability. It is possible, however, to offer persons with special needs appropriate options in living environments. Supportive services likely will be an important part of any option chosen. For those who choose to live independently, supportive services will be essential to maintaining their independence. In addition to the services mentioned previously, which are available to all extremely low-income residents, the City funds several services for persons with special needs. For example, it supports a drop-in center for the mentally ill and persons addicted to alcohol or other drugs. The City's housing rehabilitation programs often enable elderly or frail elderly homeowners to remain in their home, and allow those with physical limitations to adapt their home to their specific needs.

Actions planned to develop institutional structure

The City of Allentown's Department of Community and Economic Development will be responsible for the overall implementation of the five-year strategy outlined in its Consolidated Plan in addition to the strategy outlined in this One Year Action Plan. It will administer the contracts with nonprofit organizations providing housing rehabilitation services, homeownership opportunities, supportive housing for special needs populations, shelter and supportive counseling for the homeless, and social services for those threatened with homelessness. In addition, the Department will review proposals that seek to increase the supply and affordability of standard rental housing units. When addressing the issues of public housing, the Department works in conjunction with Allentown Housing Authority (AHA). In addition, there are several offices within the City's departmental structure that provide housing, economic, and community development services to citizens of Allentown. These include:

During the program year, the City will continue its twice monthly Department of Community and Economic Development Managers' meetings where the Director of CED, Operations Manager of CED, Director of the Bureau of Health, Director of the Bureau of Building Standards and Safety, Director of Planning and Zoning, HUD Grants Manager and Business Development Director will meet to discuss relevant Community and Economic Development issues, especially those that incorporate a variety of CED bureaus. Any programmatic issues which may arise for HUD-funded programs will be discussed and addressed. These meetings also incorporate discussions of relationships and issues with other partners such as the Redevelopment Authority of the City of Allentown, Allentown Economic Development Corporation and the Allentown Housing Authority. Any gaps in the service delivery systems can be

identified and addressed at these meetings.

The Bureau of Planning and Zoning works with many community organizations that provide services pursuant to the Plan;

The Bureau of Building Standards and Safety is responsible for code enforcement, systematic inspections, owner occupied rehabilitation and for demolition of dilapidated buildings;

The Bureau of Health is responsible for the childhood lead testing program;

The Redevelopment Authority of the City of Allentown, The Allentown Economic Development Corporation serve as development partners with the City; and

The Allentown City School District also plays an important collaborating role.

Public housing in Allentown is administered by the Allentown Housing Authority (AHA). AHA is responsible for all aspects of the Consolidated Plan dealing with public housing, and for administration of the City's Section 8/Housing Choice Voucher program. While its daily operations are independent of those of City government, AHA works closely with the Department of Community and Economic Development and other agencies to meet the City's low-income housing needs. The Director of the City's Department of Community and Economic Development sits on the Board of Directors of the Allentown Housing Authority as does one member of Allentown City Council.

Actions planned to enhance coordination between public and private housing and social service agencies

The City has improved the coordination between its existing housing programs and other agencies and levels of government by networking/sharing information. The information exchange that occurred during the Consolidated Plan process continues between public and private agencies, grantee sub-recipients and colleagues in the County. Also, as described in the Citizen Participation narrative, the City sought a wide range of citizen participation and made all materials readily available to the public for review and comment. In addition, this Consolidated Plan has the support of Mayor and City Administration. The Community Development staff of the City reviewed Requests for Proposals and, after review and evaluation, recommended approval by the City Administration.

The approach employed by the City has proven to be a valuable tool for eliciting input that would not otherwise be available. This development process combined diverse ideas and approaches into a comprehensive planning document. The process further provides a set of strategies that address the low-income needs of the City in a clear and logical fashion. The delivery system in place for these housing, public services, and community development programs is coordinated through the City's

Community Development staff. No changes to the delivery system are anticipated.

During the program year, the City will continue to encourage dialogue and collaboration with its private housing and social services agencies. During pre-contract meetings, agencies will have the opportunity to hear what housing and social services partners are proposing for the upcoming grant year.

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Projects planned with all CDBG, ESG, and HOME funds expected to be available during the year are identified in the projects table. The executive summary includes the objectives and outcomes identified in the plan as well as a evaluation of past performance, and a summary of the citizen participation and consultation process.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	93.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is

as follows:

The City does not propose to use any other forms of investment beyond those identified in Section 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The issue of resale/recapture arises when a homeowner that received homebuyer assistance under the HOME Program decides to sell the property. If the property is sold after the period of affordability has expired, there are no restrictions in terms of resale or recapture of HOME funds that apply to such a transaction. If, however, the sale occurs before the period of affordability has expired, certain regulatory limitations apply. The regulations at 92.254 (a)(5) give the participating jurisdiction two broad options relative to the treatment of properties that are sold before the period of affordability has expired:

- The owner that received HOME assistance must sell the home to a low income family that will use the property as their principal residence; or
- The participating jurisdiction must recapture some or all of the HOME investment that was initially extended to the home buyer.

The City of Allentown has opted to recapture its HOME investment at the time of resale of an assisted unit.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

HOME-assisted units, other than owner-occupied housing rehabilitation, carry occupancy restriction for varying lengths of time, known as the affordability period. The HOME assisted housing must meet the affordability period specified in the following table, beginning at the end of project completion:

Under \$15,000: 5 Years
\$15,000 to \$40,000: 10 Years
Over \$40,000: 15 Years

The City has opted to impose recapture restrictions on its HOME assisted units. Owners selling HOME-assisted properties prior to the expiration of the above affordability controls will be required to repay HOME funds as per the provisions of a mortgage and mortgage note recorded against the

property.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The PJ will not be using any HOME funds to refinance debt secured by multifamily housing that is being rehabbed with HOME funds.

Emergency Solutions Grant (ESG) Reference 91.220(I)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

The City of Allentown's written standards for providing ESG assistance are included as an attachment in the Grantee Unique Appendices (see Consolidated Grants Program information and application packet).

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Connect To Home: Coordinated Entry System of Eastern PA (CES) coordinates and manages access, assessment, prioritization and referral to housing and services for any person(s) experiencing or at imminent risk of homelessness in the following counties: Adams, Bedford, Blair, Bradford, Cambria, Carbon, Centre, Clinton, Columbia, Cumberland, Franklin, Fulton, Huntingdon, Juniata, Lebanon, Lehigh, Lycoming, Mifflin, Monroe, Montour, Northampton, Northumberland, Perry, Pike, Schuylkill, Somerset, Snyder, Sullivan, Susquehanna, Tioga, Union, Wayne and Wyoming.

Participation in CES is required for all projects funded by HUD Continuum of Care or Emergency Solutions Grants (including those administered by the Commonwealth of Pennsylvania) and strongly encouraged for all other housing and service providers in order to ensure equitable and coordinated access for all.

Connect To Home Referral Partners accept appropriate program referrals from Coordinated Entry Specialists. Coordinated Entry Specialists make direct referrals to homeless prevention and emergency services, including Emergency Shelter and Transitional Housing (both of the latter through HMIS). Rapid Re-Housing and Permanent Supportive Housing providers receive their referrals from the Community Queue prioritization list in PA HMIS. The Community Queue has special protocols for both veterans and survivors of domestic violence to ensure they are connected to appropriate housing and services.

The Eastern PA CoC has selected the Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT) as its Coordinated Entry assessment tool. There is no formal training, license or fee required to use the VI-SPDAT. However, Connect To Home Coordinated Entry Specialists are required to complete the free OrgCode VI-SPDAT training webinar series online at http://www.orgcode.com/vi_spdat.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The City of Allentown has a mailing list of interested citizens, agencies and providers (which include community and faith based organizations) and as part of its Consolidated Grants Program. Letters go out to this mailing list along with an explanation of the process of applying for and awarding Community Development Block Grant Program funds, Emergency Solutions Grants Program funds and HOME Investment Partnerships Program funds. An advertisement is also placed in The Morning Call newspaper announcing the process and a public hearing is held. In addition, the process is announced at the Lehigh Valley Regional Homeless Advisory Board meeting. The City provides technical assistance to new agencies who have never navigated the application process.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The City of Allentown presents the proposed allocations to the Lehigh Valley RHAB, whose members speak for homeless individuals. Since not only ESG funds assist homeless services in the City, the presentation includes use of CDBG and HOME funds, also.

5. Describe performance standards for evaluating ESG.

The evaluation of ESG applications is consistent with the evaluations of all applicants for the City's Consolidated Grants Program funds (CDBG, ESG and HOME).