

CITY OF ALLENTOWN, PENNSYLVANIA

CONSOLIDATED PLAN

July 1, 2010- June 30, 2015





Five-Year Strategic Plan

This document includes Narrative Responses to specific questions that grantees of the Community Development Block Grant, HOME Investment Partnership, Housing Opportunities for People with AIDS and Emergency Shelter Grants Programs must respond to in order to be compliant with the Consolidated Planning Regulations.

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Purpose of the Consolidated Plan

The purpose of the Consolidated Plan (CP) is to guide funding decisions in the City of Allentown over the next five years for the use of specific federal funds. The CP is guided by three overarching goals that are applied according to the City of Allentown's needs. The goals are:

- To provide decent, safe, and affordable housing by preserving the existing affordable housing stock, increasing the availability of affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs, and transitioning homeless persons and families into housing;
- To provide a suitable living environment through safer, more livable neighborhoods, greater integration of low and moderate income residents throughout the City, increased housing opportunities, and reinvestment in deteriorating neighborhoods; and
- To expand economic opportunities through more jobs paying self-sufficient wages, homeownership opportunities, development activities that promote long-term community livability, and the empowerment of low and moderate income persons to achieve self-sufficiency.

The primary federal funding sources in the Fiscal Year (FY) 2010-2014 Consolidated Plan are the Community Development Block Grant Program (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Shelter Grants Program (ESG) funds. These programs aim to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate income levels. Funds can be used for a wide array of activities, including: housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, loans or grants to businesses, construction of new housing, and assistance to homeless persons and families.

Focus of the Plan

As required by the federal government, the identification of needs and the adoption of strategies to address those needs must focus primarily on low and moderate income (LMI) individuals and households. The CP must also address the needs of persons with “special needs” such as the elderly, persons with disabilities, large families, single parents, homeless individuals and families, and public housing residents.

Focus Area Expansion

Due to the scarcity of CDBG, HOME, and ESG funds, and in light of the City’s desire to achieve maximum impact from its investment, HUD and other funds will be targeted to specific neighborhoods. The City of Allentown has previously established a primary Focus Area, which encompasses most of the downtown and is roughly circumscribed by: the Lehigh River (east), Cedar Creek (south), 12th Street (west), and West Green Street (north). To extend the impact of federal funds to more of its residents, the City has proposed expanding its Focus Area. This expanded Focus Area (heretofore referred to in the plan as the “Focus Area”) is predicated on the existing Focus Area, as well as the City’s newly proposed Weed & Seed Program area. The larger Weed & Seed area extends the Focus Area to the City line in the north, and encompasses a small addition in the southwest bounded by Hamilton Street, 15th Street, and Cedar Creek. This new area is illustrated in the map on page 12. Federally-funded programs and projects will be directed to certain block groups within the Focus Area based on greatest need as determined by the percentage of low and moderate income (LMI) households located in the block group.

Citizen Participation and Agency Consultation

The City has an open-ended policy of allowing for citizen input because its Consolidated Plan is contingent on citizen input. This input process includes meetings with local community groups, particularly those representing disabled and minority 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 participation of the public housing residents. The Department of Community and Economic Development produces and makes available a Consolidated Grants Program (CGP) Application Package for potential applicants.

The City encourages public communication and agency consultation in an effort to demonstrate its commitment to identifying priority needs and engaging the participation of citizens, public agencies, and nonprofit organizations in a positive and collaborative manner. A list of stakeholders and affordable housing providers was developed and included public agencies and private nonprofit organizations whose missions included the provision of affordable housing and human services to LMI households and persons. These stakeholders were invited to participate in completing specific provider-type surveys, as well as more general community needs surveys, held for the purpose of developing the CP.

Priority Needs and Strategies

The City of Allentown is committed to allocating funds that serve the needs of the lowest income and most disadvantaged residents. Households with incomes less

than 50% of the area median income, particularly those with extremely low incomes (less than 30% of area median income), are particular priorities. The City has also identified special needs individuals as among those who face the greatest challenges and who should receive high priority in the expenditure of federal funds, including at-risk children and youth, low income families, the homeless and persons threatened with homelessness, the elderly, and persons with disabilities. The following needs address these priorities:

- Affordable and quality rental housing and homeownership opportunities;
- Investment in community development activities, parks, and infrastructure in lower income and deteriorating neighborhoods and in facilities that serve lower income populations; and
- Increased economic opportunities through improved physical and utility infrastructure, as well as job-creation incentives for businesses.

By focusing on these needs, Allentown seeks to address community concerns such as:

- The provision of decent, safe, and affordable housing;
- The preservation and improvement of the quality of life experienced in Allentown's neighborhoods, and the promotion of civic and neighborhood pride as well as respect for one's neighbors;
- The improvement of the availability and accessibility of schools, churches, parks, recreational programs and facilities, and community centers for use as neighborhood resources and places for people to gather and recreate;
- The improvement of the standard of living of City residents; and
- The improvement and creation of job opportunities.

The CP requires Allentown to specifically address needs and proposed strategies in the following three areas: housing, homelessness, and community development.

Housing Needs and Strategies

High housing costs reduce economic opportunities, access to jobs and services, and the ability of lower income households, including the elderly and persons with disabilities, to live in the communities and neighborhoods of their choice. The affordability gap results in a concentration of lower income households in older neighborhoods that have higher levels of substandard housing and overcrowding.

HUD regulatory requirements are restricted to assisting households at 80% of the area median income or lower. Given the current market conditions, homeownership costs remain high. As a result, Allentown continues to focus its HOME and CDBG funds to support activities across the housing spectrum seeking to increase homeownership, particularly among low income and first time homebuyers, increase and improve the existing housing stock, for the elderly and other special needs populations, and affirmatively further fair housing.

Priority Housing Needs

- *Creation of more decent, safe, and affordable housing for households below 80% of the area median income:* From 1990 to 2000, U.S. Census figures indicate that the percentage of occupied housing units decreased significantly from 93.7% to 91.5%. Recent estimates show the percentage of occupied

housing in Allentown rising to 91.9% by 2008. Despite this rise, housing remains unattainable for a growing percentage of the City's residents. An increase in population, coupled with the economic recession and speculators purchasing properties downtown, have resulted in housing that is unaffordable for LMI households.

- *Maintain and improve the condition of the existing housing stock, particularly in the Focus Area, to meet or exceed current codes:* This strategy includes 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.
- *Creation of new affordable homeownership opportunities within the existing housing stock for LMI households:* Affordability is defined as spending no more than 35% of household income on housing related costs. This strategy involves a three-part approach focusing on: the acquisition of vacant or deteriorated properties for rehabilitation by first-time homebuyers; provision of housing rehabilitation loans; and the development of programs and incentives that encourage homeownership, particularly in the Focus Area.
- *Increase the knowledge and skills necessary for residents to own and maintain their own home:* This strategy involves support for counseling and home-buying guidance for individuals and families, a need made especially imperative in the wake of the national foreclosure crisis. Efforts should be directed towards the City's Focus Area, where homeownership rates are low.

Homeless Needs and Strategies

The priorities for ending homelessness are based on the recognition that homelessness results from more than simply a lack of affordable housing, although providing housing is the ultimate objective. In June 2007, the City of Allentown officially completed its **Plan to End Chronic Homelessness by 2017**. One recommendation of the plan to end homelessness was the creation of the Allentown Commission to End Chronic Homelessness. The Commission is now working to coordinate and support the efforts of all nearby governments, law enforcement and other public safety officials, hospitals, and other public welfare agencies and safety net providers. The plan envisions a system in which public and private agencies work together as a consortium to procure and manage housing, provide central intake services, and deliver support services to clients through a coordinated case management system.

Priority Homeless Needs

The Allentown/Northeast PA Regional Homeless Advisory Board (RHAB) Continuum of Care has identified the following strategies for addressing homeless needs in Allentown and throughout its service area. The following goal statements represent priority objectives for the homeless population in Allentown and Northeast PA developed by the Continuum of Care for the 12 months from 2009 to 2010:

- The HUD objective of at least 65% of homeless persons moving from transitional to permanent housing has been exceeded by 15% and will be maintained at 80%;
- The HUD objective of increasing to at least 77% the homeless persons staying in permanent housing over six months has been exceeded by six percent and will be maintained at 83%;
- The HUD objective of increasing the percentage of homeless persons employed at exit from 20% to 22% has been exceeded by 13% and will be maintained at 35%;
- Decrease the number of homeless households with children through by increasing transitional housing beds; and
- Create new permanent housing beds for chronically homeless persons.

Community Development Needs and Strategies

The City's economic base in the downtown has eroded, while its overall population has increased, meaning there is less tax money to serve more people. Allentown is constantly striving to attract, expand, and retain businesses. The City will continue its efforts to improve the downtown by augmenting small business activity, maintaining its parks and open space, and improving infrastructure to support businesses and residents.

Priority Community Development Needs

Based upon outreach efforts, the following community development needs were determined to have a high priority and will be the emphasis of the CDBG funding that is not directed towards housing rehabilitation:

- *Revitalizing Allentown's economy* through small business loans, vocational/educational training of City residents, and promotion of new activities in the downtown;
- *Upgrading infrastructure in downtown Allentown* – rehabilitation of public infrastructure, including streets, sidewalks, parks, and facilities, to attract businesses and residents back into the community; and
- *Improve Neighborhoods* – by rehabilitating the existing housing stock and creating homeownership and rental housing opportunities through new construction on vacant and underutilized sites.

Funding to Implement the Plan

Several potential funding sources have been identified to implement the strategies contained in the 2010–2014 Consolidated Plan. These sources include, but are not limited to:

- Federal CDBG, HOME, and ESG funds covered under the Consolidated Plan;
- Program income (\$111,000 in CDBG income and \$100,000 in HOME income in FY2009);
- State funds provided under various programs, such as Department of Community and Economic Development grants and loans for business development

One of the main obstacles to meeting community needs is inadequate resources for programs that could address these needs. State and federal funding sources for housing and community development programs are competitive and will remain limited for the immediate future.

Evaluation of Past Performance

The City of Allentown prepared a Consolidated Annual Performance and Evaluation Report (CAPER) for FY2008 (July 1, 2008 to June 30, 2009). This CAPER was the fourth of the prior five-year period and reported the FY2008 accomplishments of Allentown’s CDBG, HOME, and ESG Programs. Allentown is currently in the second half of FY2009, and its Annual Action Plan developed for this year is outlined below.

During FY2009, the City of Allentown received \$2,718,699 in CDBG funds (and an additional \$180,000 in program income), \$958,510 in HOME funds (and an additional \$140,000 in program income), and \$121,670 in ESG funds. Expenditures were more than the grant funds received, since prior year money was still available for expenditure. 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 in 2010.

The CDBG funds were spent on a variety of activities in the following eligible categories:

• Public Services	\$324,449
• Public Facilities	\$339,282
• Property Acquisition	\$257,947
• Code Enforcement	\$178,436
• Demolition	\$42,065
• Relocation	\$84,077
• Direct Homeownership Assistance	\$67,097
• Disposition	\$113,013
• Housing Rehabilitation	\$1,023,010
• Commercial Façade Improvements	\$39,379
• Micro-enterprise Assistance	\$23,409
• Planning	\$131,069
• Administration	<u>\$418,426</u>
Total	\$3,041,659

The HOME grant of \$958,510 was expended on the following eligible activities:

• Housing Rehabilitation	\$494,582
• CHDO Set-Aside	\$82,986
• Administration	<u>147,758</u>
Total	\$725,326

The ESG grant of \$121,670 was expended on the following eligible activities:

• Allentown Rescue Mission	\$29,000
• The Salvation Army – Allentown, PA Corps	\$29,000
• CACLV – Sixth Street Shelter	\$29,000
• Lehigh Co. Conference of Churches – Daybreak	\$29,000
• Administration	<u>\$5,670</u>
Total	\$121,670

In FY2009, all CDBG funds expended for activities met one of the national objectives as defined under the CDBG regulations. In FY2009, CDBG-funded activity expenditures totaled \$2,718,533, with 100% benefiting low and moderate income persons.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) 91.215(a)(1) and the basis for assigning the priority (including the relative priority, where required) given to each category of priority needs 91.215(a)(2). Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
3. Identify any obstacles to meeting underserved needs 91.215(a)(3).

1. Geographic Areas in which Assistance will be Directed

Priority CDBG funding areas in Allentown include areas where the percentage of low and moderate income (LMI) persons is 51% or higher. These areas also include areas of racial and ethnic concentration where the percentage of a specific racial or ethnic group is at least 10 percentage points higher than for the City's overall. The following narrative describes the characteristics of these areas.

Description of the Geographic Area

The City of Allentown is more racially diverse than both Lehigh County and the State of Pennsylvania, and has experienced a dramatic shift in its racial and ethnic composition since 1990. Over the last 18 years, the overall population grew by 9,120 persons (8.7%), while the minority population increased by 25,656 (175.5%). During this time period, the percent of Whites decreased from 86.2% to 64.8% of the population, while Blacks (5.0% to 12.4%), Other Races (7.3% to 17.5%), and persons of Hispanic origin (11.7% to 37.4%) all significantly increased as a percentage of total population.

Between 1990 and 2008, the racial minority share of Allentown's population has increased by 25,656 individuals (a 176.5% increase), rising from 14,533 (13.8% of the total population) in 1990 to 40,189 (35.2%) in 2008. A majority of this increase was in the number of persons who describe themselves as "Some Other Race" (12,269 individuals, comprising 47.8% of the increase) and Blacks (8908 individuals, comprising 34.7% of the increase). Details appear in the following table.

Persons of Hispanic origin may give their race as White, Black, or another race. The Hispanic population in Allentown grew the most dramatically between 1990 and 2008. In 1990, there were 12,274 Hispanics in Allentown, representing 11.7% of the total population; by 2008, there were 42,750 persons of Hispanic origin, accounting for 37.4% of the population. The following are trends in Allentown's minority populations:

- “Some Other Race” remained the largest minority group. In 2008, they represented 17.5% of the total population and 49.7% of the minority population.
- Black residents constituted a significant part of the minority population. In 2008, Blacks accounted for 35.2% of the minority population and 12.4% of the total population.
- American Indians/Alaska natives continued to represent a small percentage (0.2%) of the total population.
- Asian/Pacific Islanders and persons of “Two or More Races” accounted for 2.4% and 2.7% of the total population in 2008, respectively.
- Persons of Hispanic Origin¹ accounted for 37.4% of the total population. Between 1990 and 2008, the number of Hispanic persons increased from 12,274 to 42,750.

Population by Race and Hispanic Origin, 1990-2008

Location	Total Population	Persons of One Race										Persons of Two or More Races*		Persons of Hispanic Origin	
		White		Black		American Indian/Alaska Native		Asian/Pacific Islander		Other		#	%	#	%
		#	%	#	%	#	%	#	%	#	%				
1990															
Pennsylvania	11,881,643	10,520,201	88.5%	1,089,795	9.2%	14,733	0.1%	137,438	1.2%	119,476	1.0%	---	---	232,262	2.0%
Lehigh County	291,130	271,674	93.3%	6,776	2.3%	320	0.1%	3,661	1.3%	8,699	3.0%	---	---	15,001	5.2%
Allentown	105,090	90,557	86.2%	5,230	5.0%	186	0.2%	1,414	1.3%	7,703	7.3%	---	---	12,274	11.7%
2000															
Pennsylvania	12,281,054	10,486,177	85.4%	1,211,669	9.9%	19,511	0.2%	220,352	1.8%	188,186	1.5%	155,159	1.3%	392,121	3.2%
Lehigh County	312,090	271,599	87.0%	10,449	3.3%	721	0.2%	6,971	2.2%	16,341	5.2%	6,009	1.9%	31,811	10.2%
Allentown	106,632	77,577	72.8%	7,790	7.3%	460	0.4%	2,753	2.6%	14,057	13.2%	3,995	3.7%	25,970	24.4%
2008															
Pennsylvania	12,448,279	10,428,104	83.8%	1,288,057	10.3%	17,573	0.1%	300,482	2.4%	229,347	1.8%	184,716	1.5%	595,128	4.8%
Lehigh County	339,989	281,416	82.8%	18,270	5.4%	630	0.2%	9,832	2.9%	23,997	7.1%	5,844	1.7%	54,514	16.0%
Allentown	114,210	74,021	64.8%	14,138	12.4%	283	0.2%	2,685	2.4%	19,972	17.5%	3,111	2.7%	42,750	37.4%

* Persons of two or more races were not documented in the 1990 Census
 Source: U.S. Census 1990, SF1 (P001,P006,P008); Census 2000, SF3 (P1,P6,P7); 2008 American Community Survey 1-Year Estimates (B01003,B02001,B03002)

Concentration of Minority and Hispanic Persons

The following table presents population by race and Hispanic origin. The data is presented by census tract for 106,632 residents in Allentown in 2000. HUD defines areas of racial or ethnic concentration as geographical areas where the percentage of minorities or ethnic persons is at least 10 percentage points higher than in the City overall.

¹ Hispanic origin is defined by the Census Bureau as “people whose origins are from Spain, the Spanish-speaking countries of Central or South America, the Caribbean, or those identifying themselves generally as Spanish, Spanish-American, etc. Origin can be viewed as ancestry, nationality, or country of birth of the person or person’s parents or ancestors prior to their arrival in the United States. Spanish/Hispanic/Latino people may be of any race.”

Population by Race and Hispanic Origin, 2000

	Total Population	White	%	Black	%	Asian/Pacific Islander	%	Hispanic*	%
Allentown Total	106,632	77,577	72.8%	7,790	7.3%	2,753	2.6%	25,970	24.4%
Tract 0001	7,412	5,868	79.2%	334	4.5%	307	4.1%	935	12.6%
Tract 0002	589	546	92.7%	37	6.3%	0	0.0%	77	13.1%
Tract 0003	6,867	4,605	67.1%	602	8.8%	144	2.1%	2,375	34.6%
Tract 0004	3,412	2,224	65.2%	134	3.9%	60	1.8%	1,099	32.2%
Tract 0005	2,271	1,019	44.9%	336	14.8%	18	0.8%	1,415	62.3%
Tract 0006	5,766	4,060	70.4%	362	6.3%	140	2.4%	1,569	27.2%
Tract 0007	3,449	1,954	56.7%	426	12.4%	69	2.0%	1,384	40.1%
Tract 0008	3,615	1,787	49.4%	221	6.1%	119	3.3%	1,846	51.1%
Tract 0009	1,697	645	38.0%	247	14.6%	44	2.6%	1,014	59.8%
Tract 0010	2,777	1,473	53.0%	349	12.6%	7	0.3%	1,570	56.5%
Tract 0011	793	474	59.8%	84	10.6%	0	0.0%	384	48.4%
Tract 0012	2,206	1,185	53.7%	390	17.7%	124	5.6%	943	42.7%
Tract 0013	2,143	1,257	58.7%	334	15.6%	101	4.7%	761	35.5%
Tract 0014.01	6,398	5,237	81.9%	408	6.4%	189	3.0%	971	15.2%
Tract 0014.02	1,957	1,759	89.9%	53	2.7%	48	2.5%	148	7.6%
Tract 0015.01	6,033	4,208	69.7%	333	5.5%	208	3.4%	1,706	28.3%
Tract 0015.02	6,042	4,959	82.1%	390	6.5%	204	3.4%	530	8.8%
Tract 0016	3,448	2,129	61.7%	439	12.7%	26	0.8%	1,218	35.3%
Tract 0017	4,006	2,652	66.2%	365	9.1%	113	2.8%	1,324	33.1%
Tract 0018	4,043	2,459	60.8%	576	14.2%	41	1.0%	1,507	37.3%
Tract 0019	4,001	3,363	84.1%	190	4.7%	52	1.3%	538	13.4%
Tract 0020	4,479	3,107	69.4%	467	10.4%	69	1.5%	1,133	25.3%
Tract 0021	6,075	4,682	77.1%	454	7.5%	196	3.2%	976	16.1%
Tract 0022.01	4,410	4,156	94.2%	71	1.6%	0	0.0%	210	4.8%
Tract 0022.02	4,017	3,691	91.9%	46	1.1%	113	2.8%	184	4.6%
Tract 0023.01	5,686	5,272	92.7%	73	1.3%	317	5.6%	19	0.3%
Tract 0023.02	3,040	2,806	92.3%	69	2.3%	44	1.4%	134	4.4%

Source: Census 2000, SF3 (P6,P7)

In the City of Allentown, minority persons comprised 35.2% of the population. More specifically: Blacks comprised 7.3% of the population (17.3% threshold); Asians comprised 2.6% (12.6% threshold); and persons of Hispanic origin comprised 24.4% (34.4% threshold). In Allentown, there was one census tract that met the criteria for areas of racial concentration. It includes:

- Census Tract 12

In addition, persons of Hispanic origin represented 24.4% of the population in the City of Allentown. Therefore, an area of ethnic concentration includes the census tracts where the percentage of Hispanics is 34.4% or higher. There were 11 census tracts in Allentown which fit this criterion. They are:

- Census Tract 3
- Census Tract 5
- Census Tract 7
- Census Tract 8
- Census Tract 9
- Census Tract 10

- Census Tract 11
- Census Tract 12
- Census Tract 13
- Census Tract 16
- Census Tract 18

Low and Moderate Income Areas

The following table presents information regarding low and moderate income (LMI) persons in Allentown. LMI persons, as determined by HUD, have incomes at or below 80% of the median family income (MFI). In its 2009 estimates, HUD determined that there were 60,370 LMI persons in Allentown, equivalent to 59.4% of the population for whom this rate is determined. 2008 American Community Survey reported that the 2008 MFI in Allentown was \$44,475.

HUD defines an LMI census tract as one in which 51% or more of the population have incomes of 80% or less of MFI. According to these criteria, 23 of the City's 27 census tracts, and 56 of the 86 census block groups, qualify as LMI areas. All block groups representing qualifying LMI areas are detailed in the following chart.

Low & Moderate Income Persons by Census Tract, 2009

Census Tract	Block Group	% LMI Persons
City Total		57.5%
0001	1	25.2%
	2	48.4%
	3	65.6%
	4	54.8%
	5	59.4%
	6	59.2%
	7	43.2%
0002	1	54.0%
0003	1	67.4%
	2	46.6%
	3	83.6%
	4	62.1%
0004	1	67.6%
	2	75.9%
0005	1	74.0%
	2	83.5%
0006	1	65.6%
	2	48.5%
	3	28.3%
	4	63.8%
0007	1	81.4%
	2	67.7%
	3	78.7%
0008	1	65.1%
	2	83.8%
	3	83.4%
	4	81.0%
0009	1	78.7%
0010	1	82.1%
	2	79.2%
0011	1	87.0%
0012	1	70.0%
0013	1	83.0%
0014.01	1	65.2%
	2	54.6%
	3	49.3%
	4	44.8%
	5	39.9%
0014.02	1	28.2%
	2	48.7%
0015.01	1	53.6%
	2	66.1%
	3	65.9%

Census Tract	Block Group	% LMI Persons
City Total		57.5%
0015.02	1	33.0%
	2	37.5%
	3	54.6%
	4	56.1%
0016	1	81.5%
	2	89.7%
	3	52.7%
0017	4	65.2%
	1	61.5%
	2	65.5%
0018	3	70.3%
	1	68.9%
	2	81.3%
0019	3	62.3%
	4	67.1%
	1	46.7%
0020	2	76.5%
	1	64.9%
	2	71.5%
0021	3	67.4%
	4	57.8%
	5	59.9%
	1	47.3%
0022.01	2	70.0%
	3	45.4%
	4	35.6%
	5	66.7%
0022.02	1	35.4%
	2	46.5%
	3	40.7%
0023.01	5	34.2%
	1	52.1%
	2	60.9%
	1	30.3%
	2	14.1%
	3	23.3%
0023.02	4	20.0%
	5	26.0%
	6	44.5%
	1	29.1%
0023.02	2	32.8%
	3	39.0%

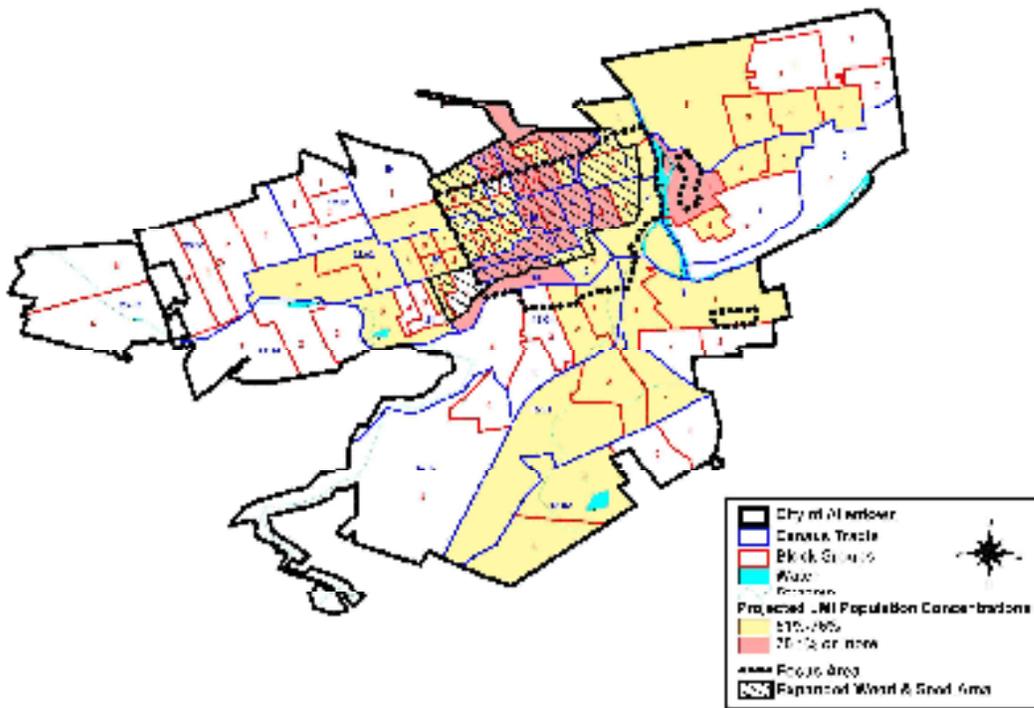
Source: HUD 2000 LMI Estimates

Concentrations of LMI Persons, Minority Persons, and Hispanics

There were 23 census tracts identified as having at least one LMI block group, with 16 of those tracts having all block groups as LMI areas. Of the 23 census tracts, all 11 were noted to be areas of minority/Hispanic concentration. They are:

- Census Tract 3
- Census Tract 5
- Census Tract 7
- Census Tract 8
- Census Tract 9
- Census Tract 10
- Census Tract 11
- Census Tract 12
- Census Tract 13
- Census Tract 16
- Census Tract 18

The City of Allentown HUD 2009 Projected LMI Concentrations



2. Basis for Allocating Investments

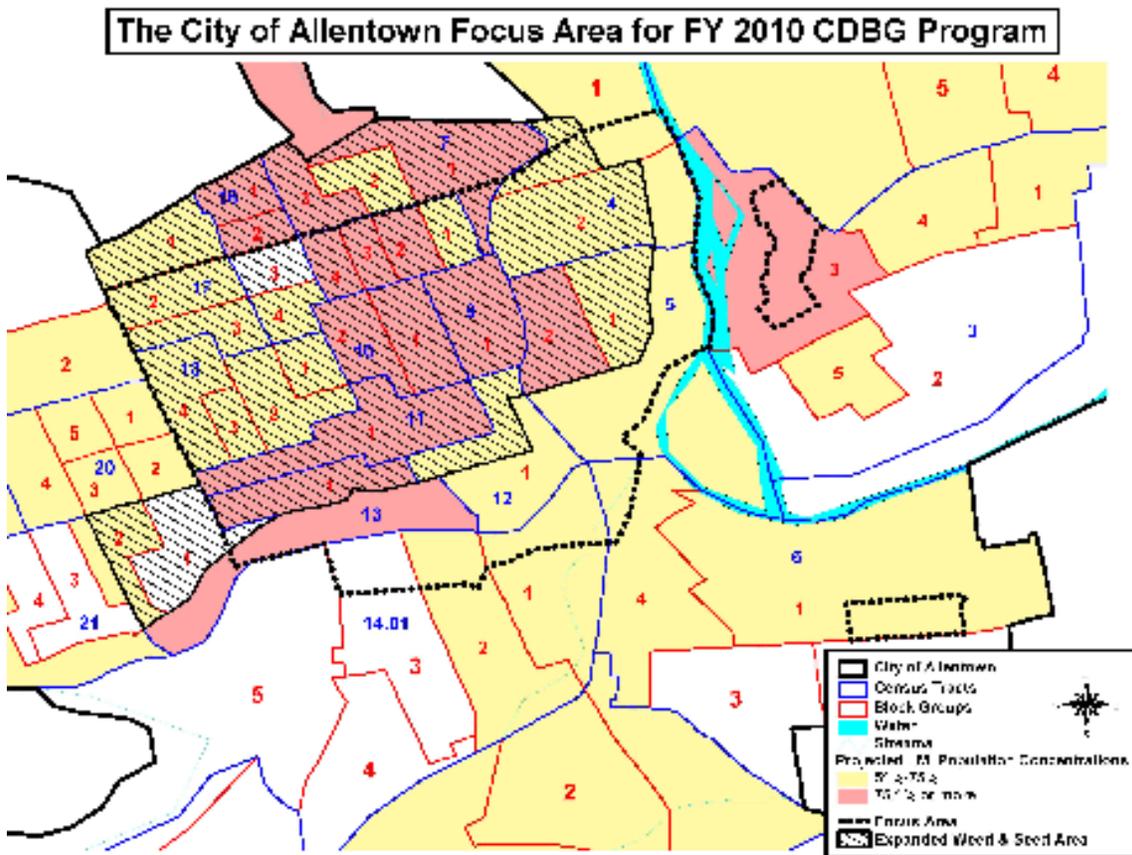
Federal CDBG funds are intended to provide low and moderate income households with viable communities, including decent housing, a suitable living environment and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration.

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

- Meeting the statutory requirements of the CDBG program
- Meeting the needs of LMI residents

- Focusing on low and moderate income areas or neighborhoods
- Coordination and leveraging of resources
- Response to expressed needs
- Sustainability and/or long-term impact
- The ability to demonstrate measurable progress and success

Much of the City’s funds are invested in the CDBG focus area in downtown Allentown. The following map describes the distribution of the areas in Allentown with an LMI majority and the expanded Focus Area for federal funds. Because 70% of the City’s CDBG funds must benefit low and moderate income persons, a significant portion of the City’s CDBG funds will be spent in these areas. These are concentrated in downtown Allentown, and are located primarily in census tracts 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14.01, 16, 17, 18, and 21. In particular, these census tracts contain the expanded Focus Area, which includes the Focus Area from the previous Consolidated Plan, as well as the proposed Weed & Seed Program area expansion, which are targeted for receiving CDBG and HOME funds.



3. 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. 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 & 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.

Managing the Process (91.200 (b))

1. Lead Agency. Identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
3. Describe the jurisdiction's consultations with housing, social service agencies, and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.

*Note: HOPWA grantees must consult broadly to develop a metropolitan-wide strategy and other jurisdictions must assist in the preparation of the HOPWA submission.

1. Lead Agency

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 County Conference of Churches, Lehigh Valley Center for Independent Living, and the Salvation Army, will also be important.

2. Significant Aspects of the Process

In November 2009, the City engaged the services of Mullin & Lonergan Associates, Inc. to serve as consultant to the project. A project schedule was developed with the goal of submitting the adopted CP to HUD on or before May 15, 2010.

The City made the decision to encourage a high level of public communication and agency consultation in an effort to demonstrate its commitment to identifying priority needs and engaging the participation of citizens, public agencies, and nonprofit organizations in a positive and collaborative manner. A list of stakeholders and affordable housing providers was developed and included public agencies and private nonprofit organizations whose missions included the provision of affordable housing and human services to LMI households and persons. These stakeholders were

invited to participate in completing specific provider-type surveys, as well as more general community needs surveys, held for the purpose of developing the CP.

The CP was developed using reliable data from sources such as the U.S. Census Bureau, HUD's State of the Cities Data System (CHAS data tables), the National Low Income Housing Coalition, the local real estate multi-list service database, municipal departments, and several planning documents produced by or on behalf of Allentown. These include the City's FY2006-10 Consolidated Plan and FY2010 Action Plan, recent CAPER reports, and Allentown 2020: The City of Allentown Comprehensive Plan, among other items.

Additionally, public and private agencies which were identified as stakeholders in the process were asked to complete written questionnaires to provide data on special needs populations such as the elderly, youth, persons with HIV/AIDS, public housing residents, persons with disabilities, and the homeless. A community-wide, online survey was also conducted to get resident input. Copies of the written questionnaires sent to the various entities are included in Additional Information – Appendix C.

Based on the public hearings and stakeholder questionnaires, a set of priorities was established by the City for the next five years.

The required Public Needs Hearing was held on January 14, 2010 at the Council Chambers, City Hall, 435 Hamilton Street, Allentown, PA. Additionally, another Public Needs Hearing was held on April 27, 2010 at the same location. A number of concerns and issues were voiced by the community; a summary of these comments is included in the Citizen Participation section. Minutes of the hearing are also kept on file in the Department of Community and Economic Development.

A draft of the Consolidated Plan for 2010-2014 and the Annual Plan for FY2010 was placed on public display for 30 days beginning March 29, 2010 and ending April 28, 2010. City Council adopted the 5-Year Plan and Annual Action Plan at its regularly scheduled meeting on May 5, 2010.

3. Jurisdiction's Consultations

The City engaged in an extensive consultation process with the community, local public agencies, and nonprofit organizations in an effort to develop a community-driven CP. From January 29 through February 15, a survey questionnaire was placed on the City's website and distributed to local service providers, and advertised for public input. In addition, more directed surveys were distributed to regional stakeholders to identify current issues and trends impacting the agencies and organizations as well as their organizational priorities. A summary of the interviews and focus group sessions is included in Additional Information—Appendix C.

Based on the survey responses received by City's Department of Community and Economic Development, several trends and urgent needs were identified. The primary housing needs identified by both the community and service provider focus groups were increased affordable housing opportunities, both homeownership and rental, for LMI households. The main public service needs were more programs for youths and seniors, 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, primarily encompassed by the Focus Area.

Various public agencies, housing groups, and private organizations submit input throughout the year that is part of the CP development process. These organizations include, but are not limited to the following groups:

Allentown Department of Community and Economic Development
Allentown Economic Development Corporation
Allentown Housing Authority
Allentown Rescue Mission
Allentown City School District
Allentown YMCA & YWCA
Boy Scouts of America, Minsi Trails Council
Boys/Girls Club of Allentown
Community Action Committee of the Lehigh Valley - Sixth Street Shelter
Community Music School
Congregations United for Neighborhood Action
Embrace Your Dreams
Habitat For Humanity - Lehigh Valley
Hispanic Chamber of Commerce
Housing Association & Development Corporation
Lehigh Carbon Community College
Lehigh County Conference of Churches
Lehigh County Department of Human Services
Lehigh Valley Assertive Community Treatment
Lehigh Valley Center for Independent Living
Neighborhood Housing Services of the Lehigh Valley, Inc.
Old Town Neighborhood Watch
Old Allentown Preservation Association
Pennrose Properties
Redevelopment Authority of the City of Allentown
Salvation Army
Syrian Arab American Charity Association
Turning Point of The Lehigh Valley
Valley Housing Development Corporation
Valley Youth House, Inc.
West Park Civic Association
West Walnut Neighborhood Association
West Watch Neighborhood Group

During the public input and agency consultation process, some general themes were repetitively voiced by the participants in the questionnaires. These themes included the following:

- The recession has substantially impacted contributions to local nonprofit organizations. The ability of these organizations to provide supportive services to their clientele is substantially impaired, and they are more reliant on local, state, and federal funds. Additionally, clients are dependent upon these public services as a safety net now more than ever.
- Issues are not concentrated in one sector. Shortfalls in housing, services,

community development, and economic conditions mean that what resources are available will not be able to meet all of the community's needs. Local nonprofit organizations reported lack of affordable housing for low income and disabled individuals, whereas a main concern of many homeless and special needs providers is lack of services. These problems are inter-related, more affordable rents would leave agencies with sufficient funds to provide services.

- Effective improvements should begin with enhanced communication between the City, local nonprofits, and the community. With less funding available, effectively targeting money and projects to those most in need will require better coordination. The City does address this issue when developing its Focus Area in which to target funds, yet this also precludes pockets of need outside of downtown.

Copies of all meeting minutes during the consultation process are included in Appendix C.

Citizen Participation (91.200 (b))

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

1. Summary of Citizen Participation Process

The City of Allentown has followed the same procedures in advertising the amount of assistance expected to be received and the range of activities to be undertaken during the fiscal year, including the estimated benefits for low and moderate income populations.

The City will make copies of the draft CP available for public review and comment for 30 days. The CP will also be posted on the City's website, www.allentownpa.gov. The draft CP will be available at the following locations, in accordance with Allentown's Citizen Participation Plan:

- Department of Community and Economic Development
435 Hamilton Street
Allentown, PA 18101
- The Allentown Public Library
1210 Hamilton Street
Allentown, PA 18102

- The Lehigh Valley Center for Independent Living
435 Allentown Drive
Allentown, PA 18109

The City conducted two Public Needs Hearings on January 14, 2010; one was held at 10:00 am and one was held at 6:00 pm at the Council Chambers, City Hall, 435 Hamilton Street, Allentown, PA. The hearings were scheduled in accordance with the City's Citizen Participation Plan. A public notice for the hearing was published in *The Morning Call*, a copy of which is included in Additional Information – Appendix C. Notices also were posted in community buildings throughout the city, including the Allentown City Hall and Allentown Housing Authority sites as well as on the City's website, www.allentownpa.gov.

2. Summary of Citizen Comments

The City received several public comments at both the January 14, 2010 and April 27, 2010 Public Needs Hearings. A summary of these comments is included in Additional Information – Appendix C

3. Summary of Efforts Made to Broaden Public Participation

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. The Department of Community and Economic Development produces and makes available a Consolidated Grants Program Application Package for potential applicants.

4. Explanation of Comments Not Accepted

During the mandated 30-day public review, the City received **XX** comments and responded per its citizen participation plan requirements. The City of Allentown has made a concerted effort towards citizen outreach, including incorporation of citizen comments regarding the goals, objectives, and focus of the Consolidated Plan. Due to the limited funding available for the many projects proposed for the city, not all comments received have been incorporated into the plan.

Institutional Structure (91.215 (i))

1. Explain the institutional structure through which the jurisdiction will carry out its consolidated plan, including private industry, non-profit organizations, and public institutions.
2. Assess the strengths and gaps in the delivery system.
3. Assess the strengths and gaps in the delivery system for public housing, including a description of the organizational relationship between the jurisdiction and the public housing agency, including the appointing authority for the commissioners or board of housing agency, relationship regarding hiring, contracting and procurement; provision of services funded by the jurisdiction; review by the jurisdiction of proposed capital improvements as well as proposed development, demolition or disposition of public housing developments.

1. Institutional Structure

PUBLIC INSTITUTIONS

Within Allentown

The City of Allentown's Department of Community and Economic Development will be responsible for the overall implementation of the five-year strategy. 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:

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

Within Pennsylvania

The coordination and provision of affordable housing and meeting community development needs is primarily represented by several essential State agencies:

- Pennsylvania Department of Community and Economic Development (DCED)
- Pennsylvania Housing Finance Agency (PHFA)

Other public agencies also collaborate in efforts to achieve the objectives outlined in the plan. These include several Lehigh County agencies, such as the Department of Human Services, and the Lehigh and Northampton Transit Authority, as well as Lehigh Carbon Community College.

The Federal Government

The U.S. Department of Housing & Urban Development (HUD) provides entitlement grant funds through the Community Development Block Grant Program (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Shelter Grants Program (ESG).

PRIVATE NONPROFIT ORGANIZATIONS

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 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. 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 many community-based organizations, including:

- Alliance for Building Communities
- Housing Association and Development Corporation
- Habitat for Humanity of the Lehigh Valley
- Neighborhood Housing Services of the Lehigh Valley

PRIVATE INDUSTRY

For-Profit Developers

Nonprofit housing providers account for a significant percentage of the affordable housing units created in Allentown; the remaining majority is provided by for-profit developers. These range from small property owners with individual buildings of three or more units to investors/developers with projects of 15 to 50 or more units.

Financial Institutions

Like many other Pennsylvania communities, Allentown has observed the closing or relocation of many local banks and financial institutions. In many cases, these local lenders have been replaced by much larger institutions with no local ties to the community. The City will strive to take an aggressive role in challenging these lenders to participate to a greater degree in providing credit on reasonable terms for lower income residents, and to fulfill their obligations under the federal Community

Reinvestment Act. The following institutions have provided financing for affordable housing development projects in Allentown within the last decade:

- Wells Fargo
- Other local banks

2. Strengths and Gaps in the System of CP Administration

The major gap remains scarce resources and limited staff to effectively operate programs. Coordination through the above listed organizations assists with networking, ensuring that overlap of missions is minimized and facilitating more efficient use of resources. The following table provides a description of strengths and weaknesses associated with agencies involved in the administration of the program process.

Assessment of Institutional Strengths & Weaknesses

Agency	Strength	Weakness
Public		
City of Allentown Department of Community and Economic Development	<ul style="list-style-type: none"> • Coordination of programs • Capacity to conduct varied activities • Technical expertise 	<ul style="list-style-type: none"> • Limited resources • Limited staff
Allentown Housing Authority	Housing for extremely low income, including elderly and disabled	<ul style="list-style-type: none"> • Limited resources
City and County Agencies	One-stop resource for many social service, education, and employment resources	<ul style="list-style-type: none"> • Limited resources • Limited staff
States Agencies (DCED, PHFA)	Varied programs to address varied housing and community development needs	<ul style="list-style-type: none"> • Limited staff • Limited resources
Nonprofit		
Nonprofit Organizations	Support services	<ul style="list-style-type: none"> • Long-term financial stability • Technical expertise • Limited resources
Private		
Banks, Lenders	Underwriting, funding, servicing	<ul style="list-style-type: none"> • Aversion to risk • Timeliness • Rate Variation

3. Strengths and Gaps in the Delivery System for Public Housing

Public housing in Allentown is administered by 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.

Monitoring (91.230)

1. Describe the standards and procedures the jurisdiction will use to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

The City of Allentown has established a staff committee which meets bi-monthly to ensure implementation of the Consolidated Plan; assess and evaluate programs, policies, and procedures; and make program adjustments, as necessary. This working group will pay particular attention to the proposed accomplishments presented in this document.

Priority Needs Analysis and Strategies (91.215 (a))

1. Describe the basis for assigning the priority given to each category of priority needs.
2. Identify any obstacles to meeting underserved needs.

1. Basis for Assigning Priorities

In light of the limited amount of CDBG, HOME and ESG funds available to the City of Allentown, not all the City's housing needs can be addressed over the next five years. Therefore, priorities must be established to ensure that scarce resources are directed to the most pressing housing needs in the City.

A multi-step process was used to establish the priorities for the City. First, data relative to each need was collected and grouped into one of four major categories: housing needs, homeless needs, non-homeless special needs, and non-housing community development needs. Second, the City of Allentown consulted with a diverse group of public agencies, nonprofit organizations, and community development entities to determine the needs as perceived by the consumers of these groups.

Finally, the data were analyzed and priorities were established (relative to the expenditure of CDBG, HOME and ESG funds) using the following definitions:

- **High** priorities – Activities to address these needs WILL be funded by the locality during the five-year period covered by the Consolidated Plan
- **Medium** priorities – If funds are available, activities to address these needs MAY be funded by the locality during the five-year period. Also, the locality will take other actions to help this group of needs locate other sources of funds
- **Low** priorities – The locality WILL NOT fund activities to address these needs during the five-year period. The locality will consider certifications

of consistency for other entities' applications for federal assistance

Medium and low priority activities are still important and are not meant to be understood as being unnecessary in the City of Allentown. Rather, it is perceived that those needs may have other, more appropriate funding sources. The City has identified a limited number of priorities to provide a focus for activities that will be funded in the next five years. If a high priority proposal is not received during the local CDBG application process, a medium priority project may be funded. There are a sufficient number of medium priority needs to ensure that funds can be spent in a timely manner.

The priorities identified in the CP were developed by:

- Weighing the severity of the need among all groups and sub-groups;
- Analyzing current social, housing and economic conditions;
- Analyzing the relative needs of low and moderate income families;
- Assessing the resources likely to be available over the next five years; and
- Evaluating input from focus group sessions, interviews, service provider surveys, City department staff, and public hearings.

2. Obstacles to Meeting Underserved Needs

The primary obstacle to meeting underserved needs in Allentown is the limited financial resources available to address identified priorities. For example, the amount of CDBG funds available under the 15% Public Service cap is consistently and significantly less than the amount requested to meet local goals. Thus, many worthwhile projects are funded at lower levels due to the ceiling on these funds.

Intensifying the impact of limited funding is the current increase in local home foreclosures, increased unemployment, increased homelessness and risk of homelessness, and the need for increased supportive services for the growing population that is negatively affected by the economy and finds itself with fewer resources. Allentown, along with most communities, has fewer resources available to address these issues as local governments face reductions in general fund and non-federal revenues, and mandated financial obligations.

Lead-based Paint (91.215 (g))

1. Estimate the number of housing units that contain lead-based paint hazards, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income, and moderate-income families.
2. Outline actions proposed or being taken to evaluate and reduce lead-based paint hazards and describe how lead based paint hazards will be integrated into housing policies and programs, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

1. Estimated Number of Housing Units that Contain Lead-Based Paint

HUD has made the elimination of housing units containing lead-based paint a priority. The poisoning of children from contact with lead-based paint has been recognized as a major public health problem by the Center for Disease Control (CDC). According to the CDC, lead is the number one environmental health hazard to American children. It is estimated that 10-15% of all preschoolers in the United States are affected. Lead poisoning causes IQ reductions, reading and learning disabilities, decreased attention span, hyperactivity, and aggressive behavior. Lead-based paint was banned from residential paint in 1978. All homes built prior to that time may contain lead-based paint.

Using data provided by HUD, it is possible to approximate the number of housing units that may contain lead-based paint and are occupied by LMI households. The significance of this data is that LMI owner households who are cost-burdened may not have the resources to abate lead-based paint in their homes. LMI renter households may not even be aware that their leased units contain lead-based paint, or they may be hesitant to ask their landlord to abate the problem for fear of being evicted or having their rent increased. The following table represents the number of housing units estimated to contain lead-based paint by income level of households. This data is matched against the number of units built before 1970 to estimate the number of units that potentially contain lead-based paint and are occupied by LMI households.

Estimated Number of Housing Units that Potentially Contain Lead-Based Paint and are Occupied by LMI Households

Housing Units by Affordability	Renter-Occupied Units	Owner-Occupied Units	Total Units
0% to =<30% of MFI			
Occupied Units	3,558	---	3,558
Built Prior to 1970	2,231	---	2,231
Estimated # of Units w/ Lead-Based Paint	1,673	---	1,673
30% to =<50% of MFI			
Occupied Units	7,369	11,933	19,302
Built Prior to 1970	5,785	10,954	16,739
Estimated # of Units w/ Lead-Based Paint	4,339	8,216	12,555
5% to =<80% of MFI			
Occupied Units	7,771	7,742	15,513
Built Prior to 1970	5,346	6,743	12,089
Estimated # of Units w/ Lead-Based Paint	4,010	5,057	9,067
Total Estimated Lead-Based Paint Units	10,022	13,273	23,295

Source: 2000 HUD Comprehensive Housing Affordability Strategy data

Note: HUD CHAS data is not available for housing units built from 1970-1978.

Source: U.S. Census Bureau; U. S. Dept. of HUD, SOCDs MCD Data

In 2000, HUD estimated that as many as 23,295 housing units built prior to 1970 and occupied by low and moderate income households contained lead-based paint. The following analysis is based on the above table.

0% to =<30% of MFI:

Of the 3,558 housing units occupied by extremely low income households, HUD estimated that 2,231 (62.7%) were built prior to 1970. HUD also estimates that 1,673 housing units built prior to 1970 contain lead-based paint, which is about 47.0% of the housing stock affordable to households with incomes of less than 30% of the MFI.

30% to =<50% MFI:

Of the 19,302 housing units occupied by very low income households, HUD estimated that 16,739 (86.7%) were built prior to 1970. HUD also estimates that 12,555 housing units built prior to 1970 contain lead-based paint, which is about 65.0% of the housing stock affordable to households with incomes between 30-50% of the MFI.

50% to =<80% MFI:

Of the 15,513 housing units occupied by low income households, HUD estimated that 12,089 (77.9%) were built prior to 1970. HUD also estimates that 9,067 housing units built prior to 1970 contain lead-based paint, which is about 58.4% of the housing stock affordable to households with incomes between 50-80% of the MFI.

2. Proposed Actions to Reduce and Eliminate Lead-based Paint Hazards

Due to the age of the housing stock, particularly the stock available to LMI households, Allentown’s Bureau of Health has been active in preventing lead poisoning for children for over 25 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. The Health Bureau actively screens 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.

Combining efforts and expertise of the City's Bureau of Building Standards and Safety and Health Bureaus, the City's Lead Hazard Control (LHC) program will focus on units – both owner-occupied and rental units – where children under the age of six reside. Many of these children have been tested by the Health Bureau and have not been found to have dangerously high blood lead levels.

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 is funded through the CDBG Program. Over 5,000 homes have been inspected during the last 29 years. Also, the housing stock in the City is mostly brick, with few painted, wooden structures.

In addition to identifying children and families who may benefit from the LHC program, the Allentown Health Bureau incorporates numerous outreach and education strategies into its activities. Lead poisoning prevention education is offered to families with children under age six including minority and non-English speaking families. Additionally, lead poisoning prevention education is provided to pre-school, child care, and clinics.

Another major component of the LHC program is the training of contractors in Lead Safe Work Practices. In February 2004, 26 workers, representing eight contracting companies, were trained. More training will be offered in the future.

The new 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 25 years.

Administrative and code enforcement staff continued to take advantage of training opportunities. Also, staff worked to disseminate appropriate information to nonprofit organizations and contractors who will be impacted by these new regulations.

HOUSING

Housing Needs (91.205)

*Please also refer to the Housing Needs Table in the Needs.xls workbook

1. Describe the estimated housing needs projected for the next five year period for the following categories of persons: extremely low-income, low-income, moderate-income, and middle-income families, renters and owners, elderly persons, persons with disabilities, including persons with HIV/AIDS and their families, single persons, large families, public housing residents, victims of domestic violence, families on the public housing and section 8 tenant-based waiting list, and discuss specific housing problems, including: cost-burden, severe cost-burden, substandard housing, and overcrowding (especially large families).
2. To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must complete an assessment of that specific need. For this purpose, disproportionately greater need exists 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 the category as a whole.

1. Estimated Housing Needs: Demographic Profile and Overview 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. The information is based primarily on data from the U.S. Census Bureau, City departments, local agency consultations, and statistics provided through the U.S. Department of Housing and Urban Development. Census 2000 data has been updated with 2008 estimates, where available.

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 114,210 according to the 2008 Census. The city occupies 18.0 square miles (46.5 km²), including 17.8 mi² of land (98.9%) and 0.2 mi² 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.

Like Lehigh County and Pennsylvania, Allentown's rate of growth has been inconsistent over the past several decades; however, it has seen an overall population loss compared to the gains in the County and the State. 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 has grown 22.2% and Pennsylvania has grown 4.1% over the same time 30-year time period. The City grew at a much faster rate (7.1%) between 2000 and 2008, bringing the total population to an estimated 114,210 residents. Between 1990 and 2008, total population growth was 8.7%. The following table displays population changes since 1960.

Population Trends, 1960-2000

	Allentown		Lehigh County		Pennsylvania	
	Pop.	% Change	Pop.	% Change	Pop.	% Change
1960	---	---	227,536	---	11,319,366	---
1970	109,521	---	255,304	12.2%	11,800,766	4.3%
1980	103,758	-5.3%	272,349	6.7%	11,863,895	0.5%
1990	105,090	1.3%	291,130	6.9%	11,881,643	0.1%
2000	106,632	1.5%	312,090	7.2%	12,281,054	3.4%

Source: U.S. Census Bureau website; www.census.gov

Annual population estimates since 2000 are reported in the table below. The City of Allentown experienced population decline from 2000-2002, which paralleled similar trends county- and state-wide. The population fell to 105,805 in 2002, from 106,632 in 2000. Throughout the decade, Allentown’s population has been relatively stagnant, as changes in population each year were less than 1% of the previous year’s total. In the eight years analyzed, there was a total population gain of 618 (0.6%). Information about this growth, as well as the relative growth of Lehigh County and Pennsylvania, is included in the following table.

Population Estimates, 2000-2008

	Allentown		Lehigh County		Pennsylvania	
	Pop.	% Change	Pop.	% Change	Pop.	% Change
2000	106,632	---	312,090	---	12,281,054	---
2001	106,336	-0.3%	314,723	0.8%	12,284,522	0.0%
2002	105,805	-0.5%	316,549	0.6%	12,298,775	0.1%
2003	105,898	0.1%	320,142	1.1%	12,317,647	0.2%
2004	106,108	0.2%	324,103	1.2%	12,335,652	0.1%
2005	106,366	0.2%	328,563	1.4%	12,351,881	0.1%
2006	106,675	0.3%	333,428	1.5%	12,388,055	0.3%
2007	106,913	0.2%	336,797	1.0%	12,419,930	0.3%
2008	107,250	0.3%	339,989	0.9%	12,448,279	0.2%

Source: U.S. Census Bureau, 2008 Population Estimates (T1)

The City of Allentown is currently divided into 27 census tracts, as detailed in the following table.

Population by Census Tract, 2000

Population by Census Tract, 2000	
City Total	106,632
Tract 0001	7,412
Tract 0002	589
Tract 0003	6,867
Tract 0004	3,431
Tract 0005	2,252
Tract 0006	5,766
Tract 0007	3,449
Tract 0008	3,615
Tract 0009	1,655
Tract 0010	2,819
Tract 0011	882
Tract 0012	2,213
Tract 0013	2,047
Tract 0014.01	6,398
Tract 0014.02	2,146
Tract 0015.01	6,033
Tract 0015.02	6,042
Tract 0016	3,259
Tract 0017	4,006
Tract 0018	4,043
Tract 0019	4,001
Tract 0020	4,479
Tract 0021	6,075
Tract 0022.01	4,410
Tract 0022.02	4,017
Tract 0023.01	5,686
Tract 0023.02	3,040

Source: 2000 Census, SF1 (P1)

Households

As of 2008, the City of Allentown contained 41,038 households. Of these:

- 15,938 (38.8%) had children under 18 living in them,
- 15,128 (36.9%) were married couples living together,
- 8,239 (20.1%) had a female householder with no husband present, and
- 14,437 (35.2%) were non-family households.

The number of households in Allentown decreased 1.2% from 42,562 in 1990 to 42,051 in 2000. Current estimates for 2008 show a further decrease to 41,038 (0.5%) households. Overall, there was a total loss of 1,524 households since 1990,

a 3.6% decline. Persons per household increased slightly from 2.36 in 1990 to 2.42 in 2000, and again to 2.47 in 2008. This is due primarily to the decrease in households, as opposed to the slight increase in population over the same time period. In 2008, household sizes in Allentown were smaller than in Lehigh County (2.55), but larger than for the State (2.42).

Trends in Household Types and Size in Allentown, 1990-2008

	1990		2000		2008	
	#	%	#	%	#	%
Total Households	42,562	---	42,051	---	41,038	---
Family Households	26,633	62.6%	25,356	60.3%	26,601	64.8%
Married-couple family	19,550	45.9%	16,911	40.2%	15,128	36.9%
With Children	7,753	18.2%	7,080	16.8%	7,630	18.6%
Without Children	11,797	27.7%	9,831	23.4%	7,498	18.3%
Female-Headed Households	5,410	12.7%	6,310	15.0%	8,239	20.1%
With Children	2,980	7.0%	4,090	9.7%	6,377	15.5%
Without Children	2,430	5.7%	2,220	5.3%	1,862	4.5%
Male-Headed Household	1,673	3.9%	2,135	5.1%	3,234	7.9%
With Children	608	1.4%	1,205	2.9%	1,931	4.7%
Without Children	1,065	2.5%	930	2.2%	1,303	3.2%
Non-family & 1-person household	15,929	37.4%	16,695	39.7%	14,437	35.2%
Average Household Size	2.36		2.42		2.47	

Sources: U.S. Census Bureau, 1990 STF3 (P019), Census 2000, SF3 (P10); 2008 American Community Survey (C11005); DemographicsNow

Income and Poverty

Adjusted to 2008 dollars, the median household income (MHI) in Allentown decreased significantly from \$45,114 in 1990 to \$41,375 in 2000, and then further decreased to \$39,036 in 2007. This amounts to a 13.5% decrease during those 18 years.

The decline in the City’s median household income contrasts with the shift in the distribution of households by income – a decreasing percentage of lower income households, coupled with an increasing proportion of more affluent households. This trend is illustrated in the following table. This disparity between MHI and household income distribution is primarily due to household incomes not keeping pace with inflation.

Allentown Household Incomes, 1990-2008

	1990		2000		2008	
	Total	% of Total	Total	% of Total	Total	% of Total
Less than \$10,000	7,048	16.6%	5,203	12.4%	4,416	10.8%
\$10,000 to \$14,999	4,159	9.8%	3,689	8.8%	2,941	7.2%
\$15,000 to \$24,999	9,218	21.7%	7,454	17.7%	5,461	13.3%
\$25,000 to \$34,999	7,646	18.0%	6,453	15.3%	5,459	13.3%
\$35,000 to \$49,999	8,039	18.9%	7,309	17.4%	7,603	18.5%
\$50,000 to \$74,999	4,537	10.7%	7,313	17.4%	8,094	19.7%
\$75,000 to \$99,999	1,149	2.7%	2,586	6.1%	3,791	9.2%
\$100,000 to \$149,999	475	1.1%	1,588	3.8%	2,195	5.3%
More than \$150,000	291	0.7%	456	1.1%	1,078	2.6%
Total	42,562	100.0%	42,051	100.0%	41,038	100.0%
Median Household Income	\$45,114*		\$41,375*		\$39,036	

* Adjusted to 2008 dollars

Source: Census 1990, SF3 (P080, P080A); Census 2000, SF 3 (P52, P53); 2008 American Community Survey 1-Year Estimates (B19001)

In 2008, Black households had the highest MHI of \$42,380. The MHI for White households was \$39,381, slightly above the overall MHI for the City. Hispanic households, on the other hand, had a significantly lower MHI of \$28,017.

Household Income by Race and Ethnicity, 2008

	Total	\$0 to \$24,999	%	\$25,000 to \$49,999	%	\$50,000 to \$74,999	%	\$75,000 and higher	%
Total	41,038	12,818	31.2%	13,062	31.8%	8,094	19.7%	7,064	17.2%
White	29,269	9,249	31.6%	8,723	29.8%	6,045	20.7%	5,252	17.9%
Black	3,835	792	20.7%	1,435	37.4%	560	14.6%	1,048	27.3%
Hispanic	12,286	5,546	45.1%	3,831	31.2%	1,905	15.5%	1,004	8.2%

Source: U.S. Census Bureau, 2008 American Community Survey (C19001, B19001A, B19001B, B19001D, B19001I)

The number of persons living below poverty level in Allentown increased 45.3% between 1990 and 2000, and 18.4% between 2000 and 2008. These are much greater rates than the increases in the City’s overall population during the same time periods - 1.5% and 7.1%, respectively. These trends are reflected in the increased percentages of persons living below the poverty line. In Allentown in 1990, there were 12,999 persons below the poverty line, which was 12.9% of all persons for whom poverty was determined. By 2000, this number rose to 18,882, accounting for 18.5% of persons for whom poverty was determined. In Lehigh County, the number of persons below the poverty line rose 36.5% between 1990 and 2000 and 16.1% between 2000 and 2008; however, this increase was accompanied by more substantial increases in population of 7.2% and 8.9%, respectively. In Pennsylvania, the number of persons living below poverty level as a percentage of the population has remained relatively flat from 1990 to 2008, decreasing from 1990 to 2000, and increasing from 2000 to 2008.

Persons with Incomes below Poverty Level, 1990-2008

	1990		2000		2008	
	Persons below poverty level	% below poverty level	Persons below poverty level	% below poverty level	Persons below poverty level	% below poverty level
Pennsylvania	1,283,629	11.1%	1,304,117	11.0%	1,458,394	12.1%
Lehigh County	20,579	7.3%	28,095	9.3%	32,641	9.9%
Allentown	12,999	12.9%	18,882	18.5%	22,353	20.4%

Source: 1990 U.S. Census, SF3 (P117); Census 2000, SF3 (P87); 2008 American Community Survey 1-Year Estimates (C17001)

Cost Burden and Other Housing Problems

The following provides an estimate of the number and type of households in need of housing assistance. The review considers needs for the households according to the following categories:

- Extremely low income households (income less than 30% of MFI);
- Very low income households (income between 30% and 50% of MFI);
- Low income households (income between 50% and 80% of MFI); and
- Households with income above 80% of MFI (moderate, middle, and high income households).

The description of housing needs contained in this part includes discussion of cost burden and severe cost burden, overcrowding, and substandard housing conditions being experienced by income category.

Estimated Housing Needs of Extremely Low, Very Low, and Low Income Households

Much of the data reported in this section of the Consolidated Plan was derived from CHAS Data 2000. CHAS Data 2000 is a special tabulation prepared for HUD by the Census Bureau. HUD reports that the Census Bureau uses a special rounding scheme on special tabulation data. As a result, there may be discrepancies between the data reported by CHAS Data 2000 and the data reported by Census 2000 Summary File 3, which is the source of much of the data in other parts of the CP. (While CHAS data from 2000 may appear dated, it is the only source of data for this analysis and is required by HUD).

Using CHAS Data 2000, the following table indicates households with any housing problem. Information is presented for renters and owners. As defined by CHAS Data 2000, any housing problem includes: 1) a cost burden greater than 30% of income, and/or 2) overcrowding, and/or 3) units without complete kitchens or plumbing facilities. The table also identifies cost-burdened households. Cost-burdened households are defined in two tiers: households paying from 30% to 50% of their income on housing, and households paying more than 50%. Households paying more than 50% of income are classified as severely cost-burdened households.

Households with Housing Problems by Household Income, 2000

Income Category of Household	Total	Any Housing Problem*		Cost Burden				Other Housing Problems**	
				More than 30%		More than 50% (Severe)			
		Total	%	Total	%	Total	%	Total	%
Renter Households									
Extremely Low (0-30% MFI)	5,421	3,968	73.2%	3,865	71.3%	2,770	51.1%	103	1.9%
Very Low (30 to 50% MFI)	4,132	2,781	67.3%	2,549	61.7%	698	16.9%	232	5.6%
Low (50 to 80% MFI)	4,417	1,126	25.5%	786	17.8%	40	0.9%	340	7.7%
Above 80% MFI	5,773	416	7.2%	156	2.7%	40	0.7%	260	4.5%
Total Renters	19,743	8,291	42.0%	7,356	37.3%	3,548	18.0%	935	4.7%
Owner Households									
Extremely Low (0-30% MFI)	1,715	1,315	76.7%	1,291	75.3%	899	52.4%	24	1.4%
Very Low (30 to 50% MFI)	2,512	1,304	51.9%	1,253	49.9%	530	21.1%	51	2.0%
Low (50 to 80% MFI)	4,657	1,737	37.3%	1,625	34.9%	293	6.3%	112	2.4%
Above 80% MFI	13,408	1,032	7.7%	831	6.2%	80	0.6%	201	1.5%
Total Owners	22,292	5,388	24.2%	5,000	22.4%	1,802	8.1%	388	1.7%
All Households									
Total Households	42,035	13,679	32.5%	12,356	29.4%	5,350	12.7%	1,323	3.1%
* Any Housing Problems: Cost burden greater than 30% of income, and/or overcrowding, and/or without complete kitchen or plumbing.									
**Other Housing problems: Overcrowding, and/or without complete kitchen or plumbing.									
Source: 2000 HUD Comprehensive Housing Affordability Strategy data									

As shown in the table above, CHAS Data 2000 reports there are 42,035 households in Allentown. Of these households, 19,743 are renters (47.0%) and 22,292 (53.0%) are homeowners.

It is interesting to note the following statistics.

- There are 13,679 households (32.5%) that have housing problems.
- Of these households, 12,231 (89.4%) are low income, with annual incomes at or below 80% of the median family income (MFI). Lower income households are most likely to have housing needs due to limited resources.
- There are 8,291 renter households (19.7% of total households) that are experiencing housing problems. Renters comprise 60.6% of the 13,679 households with a housing problem.
- Of the 19,743 renter households, 13,970 (70.8%) have incomes classified as low, very low, or extremely low. Of the 8,291 renter households with a housing problem, 7,875 (95.0%) have incomes at or below 80% of MFI.
- There are 5,388 owner households (12.8%) with a housing problem. Owners comprise 39.4% of the 13,679 households with a housing problem.
- Of the 22,292 owner households, 8,884 (39.9%) have incomes classified as low, very low, or extremely low. Of the 5,388 owner households with a housing problem, 4,356 (80.8%) are low income.

Information is also available regarding cost burden by income category. According to 2000 CHAS data 12,356 households (29.4%) pay 30% or more of their income for housing. Of the total households, 5,350 (12.7%) pay more than 50% of their income for housing. The following information is also evident from the data in the table above.

- Of the 19,743 renter households, 7,356 (37.3%) are cost-burdened. Renters make up 59.5% of the 12,356 cost-burdened homes.
- Of the 22,292 owner households, 5,000 (22.4%) are cost-burdened. Owners make up 40.5% of the 12,356 cost-burdened homes.
- In total, Allentown has 7,136 extremely low income households. Of these, 5,156 (72.3%) are cost-burdened. Furthermore, 3,669 (71.2%) of the 5,156 households pay 50% or more of their income for housing costs.
- In total, the City has 6,644 very low income households. Of these, 3,802 (57.2%) are cost-burdened. In addition, 1,228 (32.3%) of the 3,802 pay 50% or more of their income for housing costs.
- Allentown has 9,074 low income households. Of these, 2,411 (26.6%) are cost-burdened. Additionally, 333 (13.8%) of the 2,411 pay 50% or more of their income for housing costs.
- Finally, the City has 19,181 households with income above 80% MFI. Of these, 987 (5.1%) are cost-burdened. Moreover, 120 (12.2%) of the 987 pay 50% or more of their income for housing costs.

Cost-burdened renters need decent, affordable housing. Extremely low income households have the greatest need for continued assistance in the form of a subsidy or an affordable unit. Very low income and low income renters with a housing problem need assistance with supportive services, such as childcare, health care, and/or transportation services. Assistance with supportive services reduces demands on their incomes, which leaves additional funds to pay for housing. Very low income and low income renters who are provided assistance with other services may be able to save money that can be used for a down payment and closing costs on an owner unit. Given that the most common housing problem in Allentown is cost burden, especially for the lowest income households, it seems especially important to help to relieve some of the additional costs that households face. Because the majority of the low income renters are experiencing cost burden, all would benefit from improved economic opportunities. To take advantage of higher-skilled jobs that pay more and provide the potential for advancement, there will be the need for education and job training.

Low income owners who are cost-burdened need assistance with maintenance and upkeep of their units so that they do not deteriorate. Low income owners also need assistance with supportive services that reduce the competing demands on their limited incomes. Finally, low income owners would benefit from improved economic opportunities.

Through use of the CHAS Data 2000, it is possible to calculate households by household income with "Other Housing Problems." Other housing problems exclude cost burden but include overcrowding, in addition to a lack of complete kitchen and/or plumbing facilities. The previous CHAS table identifies the following characteristics about other housing problems in Allentown.

- Of the 13,679 households with housing problems, 1,323 (9.7% of all households) are classified as "other" housing problems.
- Of the 1,323 households with "other" housing problems, 862 (65.2%) are low income, with annual incomes at or below 80% of MFI.
- In addition, 675 (78.3%) of the 862 low income households classified as "other" housing problems are renters.

Estimated Housing Needs of Elderly Households, Small Households, Large Households and All Other Households

This section considers housing needs based on type of households. For the purposes of this section, elderly households are one- or two-person households, where either person is 62 years of age or older. Small households consist of two to four persons and large households have five or more persons. All other households are those that do not fall into one of the three previous categories.

The following table shows the 19,743 renter households reported in Allentown by CHAS Data 2000. The households are distinguished by household type and income category. The table also shows the 8,289 renter households with a housing problem, as previously reported, by household type and income category. The following characteristics emerge from the table:

- There are 4,173 elderly renter households, which is 21.1% of the total renters. Of these, 3,520 (84.4%) are low income. Additionally, 1,899 (45.5%) of the total elderly renter households have a housing problem. Of these 1,899 households, 1,781 (93.8%) are low income.
- There are 6,785 (34.4%) small households. Of these, 4,670 (68.8%) are low income. In addition, 2,694 (39.7%) of the total small households have a housing problem. Of the small households with housing problems, 2,603 (96.6%) are low income households.
- There are 1,928 (9.8%) large rental households in the city. Of these, 1,518 (78.7%) are low income. Furthermore, 66.5%, or 1,282 of the total large households, have a housing problem. Of the large renter households with housing problems, 1,172 are low income. These low income large households with housing problems comprise 60.8% of the total large households.
- The remaining 6,857 households in the city are "all other" households. Of these, 4,262 (62.2%) are low income. In addition, 2,414 (35.2%) have a housing problem. Of the 2,414 "all other" renter households with a housing problem, 2,318 (96.0%) are low income.

While small households experience the largest number of housing problems, a greater percentage of large households (66.5%) have a housing problem, particularly among those that are low income. Low income larger households could be overcrowded and need assistance with obtaining a larger unit.

Renter Households by Household Type and Income with Any Housing Problems, 2000

	Total	Elderly Households			Small Households (2-4)			Large Households (5+)			All other households		
		Total	With a Problem	%	Total	With a Problem	%	Total	With a Problem	%	Total	With a Problem	%
Extremely Low (0% to 30% MFI)	5,421	1,638	1,012	61.8%	1,720	1,290	75.0%	665	605	91.0%	1,398	1,058	75.7%
Very Low (30% to 50% MFI)	4,132	1,153	573	49.7%	1,295	925	71.4%	459	389	84.7%	1,225	895	73.1%
Low (50% to 80% MFI)	4,417	729	194	26.6%	1,655	391	23.6%	394	179	45.4%	1,639	364	22.2%
Above 80% MFI	5,773	653	118	18.1%	2,115	91	4.3%	410	110	26.8%	2,595	96	3.7%
Total Renters	19,743	4,173	1,897	45.5%	6,785	2,696	39.7%	1,928	1,283	66.5%	6,857	2,414	35.2%

Source: 2000 HUD Comprehensive Housing Affordability Strategy data

The following table shows the 22,292 owner households reported in Allentown by CHAS Data 2000. The households are distinguished by household type and income category. The table also shows the 5,393 owner households with a housing problem, as previously reported, by household type and income category. The following characteristics emerge from the table:

- There are 6,961 elderly owner households, which is 31.2% of the total owners. Of these, 4,176 (60.0%) are low income. Additionally, 1,636 (23.5%) of the total elderly households have a housing problem. Of these 1,636 households, 1,511 (92.4%) are low income.
- There are 9,582 (43.0%) small owner households. Of these, 2,463 (25.7%) are low income. In addition, 1,811 (18.9%) of the total small owner households have a housing problem. Of the small owner households with housing problems, 1,405 (77.6%) are low income households.
- There are 2,197 (9.9%) large owner households in the city. Of these, 1,013 (46.1%) are low income. Furthermore, 37.0%, or 813 of the total large owner households, have a housing problem. Of the large owner households with housing problems, 654 (80.4%) are low income households. These low income large owner households with housing problems comprise 29.8% of the total large households.
- The remaining 3,552 households in the city are “all other” owner households. Of these, 1,232 (34.7%) are low income. In addition, 1,133 (31.9%) have a housing problem. Of the 1,133 “all other” owner households with a housing problem, 787 are low income.

While small owner households experience the largest number of housing problems, a greater percentage of large owner households (37.0%) have a housing problem, particularly among those that are low income.

Owner Households by Household Type and Income with Any Housing Problems, 2000

	Total	Elderly Households			Small Households (2-4)			Large Households (5+)			All other households		
		Total	With a Problem	%	Total	With a Problem	%	Total	With a Problem	%	Total	With a Problem	%
Extremely Low (0% to 30% MFI)	1,715	908	688	75.8%	329	264	80.2%	204	169	82.8%	274	194	70.8%
Very Low (30% to 50% MFI)	2,512	1,514	550	36.3%	509	404	79.4%	220	150	68.2%	269	200	74.3%
Low (50% to 80% MFI)	4,657	1,754	274	15.6%	1,625	735	45.2%	589	334	56.7%	689	394	57.2%
Above 80% MFI	13,408	2,785	125	4.5%	7,119	406	5.7%	1,184	159	13.4%	2,320	346	14.9%
Total Owners	22,292	6,961	1,637	23.5%	9,582	1,808	18.9%	2,197	812	37.0%	3,552	1,134	31.9%

Source: 2000 HUD Comprehensive Housing Affordability Strategy data

Estimated Housing Needs for Persons with HIV/AIDS

Persons living with HIV/AIDS require several levels of service. In addition to substance abuse and mental health services, clients are also in need of life skills training, including employment and vocational training and managing activities of daily living, such as living on a fixed income. Increasingly, supportive services are also dealing with the complications of aging, as medical advances have increased the life expectancy of those living with HIV/AIDS.

In Lehigh County, an estimated 799 persons are living with HIV/AIDS, as reported by the Pennsylvania Department of Health.

Currently, there are no facilities with a planned service component specifically for persons with HIV/AIDS. However, there are a wide range of social services available to this population living in private housing throughout the City.

Estimated Housing Needs for Persons with Disabilities

Census 2000 reported 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.

In Allentown, there were 97,191 non-institutionalized persons age five years and older in 2000. Of these, 21,676 (22.3%) had at least one disability. The table below shows the number of persons living with at least one disability by census tract. Notably, in four census tracts – 0002, 0011, 0012, and 0013 – the number of persons with at least one disability exceeds 40% of the total population.

Persons with Disability by Census Tract, 2000

	Civilian non-institutionalized population ages 5 and up	With at least one type of disability	%
City Total	97,191	21,676	22.3%
Tract 0001	6,818	1,227	18.0%
Tract 0002	354	165	46.6%
Tract 0003	6,291	1,360	21.6%
Tract 0004	3,069	870	28.3%
Tract 0005	2,094	582	27.8%
Tract 0006	5,377	1,142	21.2%
Tract 0007	3,168	745	23.5%
Tract 0008	3,307	843	25.5%
Tract 0009	1,512	416	27.5%
Tract 0010	2,457	889	36.2%
Tract 0011	699	301	43.1%
Tract 0012	1,420	586	41.3%
Tract 0013	1,936	790	40.8%
Tract 0014.01	5,948	1,258	21.1%
Tract 0014.02	1,823	344	18.9%
Tract 0015.01	5,464	933	17.1%
Tract 0015.02	5,712	890	15.6%
Tract 0016	3,169	759	24.0%
Tract 0017	3,722	764	20.5%
Tract 0018	3,660	930	25.4%
Tract 0019	3,638	1,157	31.8%
Tract 0020	4,068	827	20.3%
Tract 0021	5,724	1,209	21.1%
Tract 0022.01	4,172	865	20.7%
Tract 0022.02	3,291	532	16.2%
Tract 0023.01	5,421	872	16.1%
Tract 0023.02	2,877	420	14.6%

Source: Census 2000, SF3 (PCT26)

Lehigh Valley Center for Independent Living (LVCIL), an advocacy group for consumers at the individual and public policy levels, works to ensure that public and private programs and services are available to people with disabilities and that the programs encourage independent community living. In addition, LVCIL staff remains involved with federal, state, county, and local government and represents the interests of people with disabilities on government advisory committees and at public forums. Other services include disability awareness, a housing options program, an architectural barriers consultation program, and an independent living transition program.

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 31 years, Turning Point has operated as a community safety net, particularly during times of economic hardship. Turning Point provides a number of services, including a 24-hour helpline, emergency shelter, legal services in the form of protection from abuse orders, and counseling. 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. There are 15 total bedrooms, which can accommodate up to 20 adults and their children at any one time. These facilities provide communal living arrangements with shared bathrooms, kitchens, and housekeeping duties.

Estimated Housing Needs for Families on the Public Housing and Section 8 Waiting Lists

According to Allentown Housing Authority, there are 4,133 families on the City's Housing Choice Voucher waiting list, which is currently closed with about a one- to two-year wait projected. Most of the applicants (81.9%) for Housing Choice Vouchers (HCV) are small families, with two to four members, and most families in the public housing system request two- to three-bedroom units.

Of the applicants on the Section 8/HCV and public housing lists, a majority are extremely low income, 77.4% and 84.3%, respectively. For the public housing waiting list, 11.9% are very low income, and 3.9% are low income. Whites comprise the most represented racial group on the Section 8/HCV waiting list, accounting for more than three quarters (78.0%) of the waiting list, while Blacks comprise nearly a quarter (22.0%) of the public housing waiting list. For the Section 8/HCV waiting list, 64.0% are classified as being of Hispanic origin, while 70.3% of the public housing list is categorized in this group.

2. Disproportionately Greater Housing Problems

Using CHAS Data 2000, the following analysis considers the housing needs for all households in comparison to households by race and ethnicity in Allentown. The review serves to consider disproportionately greater need. As defined by HUD, a disproportionately greater need among any racial or ethnic group exists when a particular racial or ethnic group has housing problems at least 10 percentage points higher than the percentage of persons in that category as a whole.

The following table compares the percentage of households with housing problems among White non-Hispanic, Black non-Hispanic, and Hispanic households with all households in Allentown having incomes less than 80% MFI. CHAS Data 2000 did not contain complete information about other races.

There are 13,688 renter households with incomes at or below 80% of MFI. The following table compares the percentage of households with housing problems for White non-Hispanic, Black non-Hispanic, and Hispanic households. CHAS Data 2000 did not contain complete information about other races. The data table reports the following characteristics for Allentown:

- Of the total LMI renter households, 56.1% have a housing problem. White non-Hispanic renters reported instances of problems at slightly lower rates (52.3%), while Black non-Hispanic and Hispanic renters reported instances of problems at higher rates (63.6% and 61.9%, respectively).
- There are 1,752 LMI elderly renter households with a housing problem, which is 50.4% of all elderly households. There are 50 Black non-Hispanic households and 205 Hispanic households in this category. Both Black non-Hispanic and Hispanic households reported problems at rates significantly higher than average, 69.4% and 64.8%, respectively.
- There are 3,626 small and large renter households with a problem, 60.3% of total households in this category. Of these, both Black non-Hispanic and Hispanic households have significantly higher concentrations of reported problems, with 66.7% and 62.4%, respectively.
- There are 4,198 "Other" renter households, of which 2,307 or 55.0% reported a housing problem. Hispanic households reported the highest rate of problems: 512 of the total 871 households, or 58.8%, had a housing problem.

LMI Renter Households with Any Housing Problem by Race of Household & Hispanic Origin, 2000

	Households 0-80% of MFI		Elderly Households 0-80% of MFI			Small and Large Households* 0-80% of MFI			All Other Households 0-80% of MFI		
	Total	% with a Housing Problem	Total	With a Problem	%	Total	With a Problem	%	Total	With a Problem	%
White non-Hispanic	7,967	52.3%	3,048	1,472	48.3%	2,072	1,174	56.7%	2,847	1,525	53.6%
Black non-Hispanic	1,035	63.6%	72	50	69.4%	636	424	66.7%	327	184	56.3%
Hispanic	4,384	61.9%	316	205	64.8%	3,197	1,995	62.4%	871	512	58.8%
All Households <80% MFI	13,386	56.1%	3,436	1,727	50.3%	5,905	3,593	60.8%	4,045	2,221	54.9%

* For individual racial/ethnic groups, "Small Related" and "Large Related Households" are described as "Family Households"

Source: 2000 HUD Comprehensive Housing Affordability Strategy data

There are 8,761 owner households with incomes at or below 80% of MFI. The following table compares the percentage of households with housing problems for White non-Hispanic, Black non-Hispanic, and Hispanic households. CHAS Data 2000 did not contain complete information about other races. The data table reports the following characteristics for Allentown.

- Of the total LMI owner households, 48.8% have a housing problem. Black non-Hispanic and Hispanic owners report instances of problems at higher rates, at 63.0% and 65.5%, respectively.

- There are 1,503 LMI elderly owner households with a housing problem, which is 36.1% of all elderly households. There are 42 Black non-Hispanic households and 48 Hispanic households in this category, reporting rates of problems at 57.1% and 45.8%, respectively.
- There are 2,013 small and large owner households with a problem, 59.0% of the total households in this category. Of these, Black non-Hispanic and Hispanic households have slightly higher concentrations of reported problems, with 65.8% and 66.6%, respectively.
- There are 1,187 “Other” owner households of which 755, or 63.6%, reported a housing problem. All three categories reported similar rates of problems, although the relatively low rate among Black non-Hispanic households is due to the small sample size.

LMI Owner Households with Any Housing Problem by Race of Household and Hispanic Origin, 2000

	Households 0-80% of MFI		Elderly Households 0-80% of MFI			Small and Large Households* 0-80% of MFI			All Other Households 0-80% of MFI		
	Total	% with a Housing Problem	Total	With a Problem	%	Total	With a Problem	%	Total	With a Problem	%
White non-Hispanic	7,126	46.2%	3,993	1,448	36.3%	2,071	1,158	55.9%	1,062	689	64.9%
Black non-Hispanic	216	63.0%	42	24	57.1%	158	104	65.8%	16	8	50.0%
Hispanic	1,104	65.5%	48	22	45.8%	964	642	66.6%	92	59	64.1%
All Households <80% MFI	8,446	48.8%	4,083	1,494	36.6%	3,193	1,904	59.6%	1,170	756	64.6%

* For individual racial/ethnic groups, "Small Related" and "Large Related Households" are described as "Family Households"
 Source: 2000 HUD Comprehensive Housing Affordability Strategy data

Priority Housing Needs (91.215 (b))

1. Identify the priority housing needs and activities in accordance with the categories specified in the Housing Needs Table (formerly Table 2A). These categories correspond with special tabulations of U.S. census data provided by HUD for the preparation of the Consolidated Plan.
2. Provide an analysis of how the characteristics of the housing market and the severity of housing problems and needs of each category of residents provided the basis for determining the relative priority of each priority housing need category.

Note: Family and income types may be grouped in the case of closely related categories of residents where the analysis would apply to more than one family or income type.

3. Describe the basis for assigning the priority given to each category of priority needs.
4. Identify any obstacles to meeting underserved needs.

Note: The required Housing Needs Table (formerly HUD Table 2A) is included in Additional Information – Appendix A.

1. Priority Housing Needs and Activities

According to the Housing Needs Assessment conducted for the CP, the following

priority housing needs were identified:

- Extremely low income households (below 30% of area MHI) experience the highest degree of housing problems. Specifically, 3,865 (71.3% of total extremely low income renters) households were paying more than 30% of income on housing costs, while another 2,770 (51.1%) households were paying more than 50% of income on housing costs. Among homeowners, 1,291 (75.3%) households were paying more than 30% and another 899 (52.4%) were paying more than 50% on housing costs.
- Very low income households (between 30% and 50% of MHI) also experience a disproportionately large cost burden. Specifically, 2,549 (61.7% of total very low income renters) households paid more than 30% of income on housing costs. Among homeowners, 1,253 (50.0%) households paid more than 30% and another 530 (21.1%) paid more than 50% of income on housing costs.
- Small renter households consisting of two to four members are the most impacted by housing problems. Nearly 2,700 small renter households experience housing problems compared to elderly households (1,899), large households (1,282) and all other household types (2,414).
- Among homeowners, housing problems affected large households more than any other group. Nearly 2,200 elderly home owners had housing problems compared to small households (1,811), elderly households (1,636) and all other household types (1,133).

To address these priority housing needs, the City of Allentown will undertake the following activities over the next five years:

- **Priority Activity #1:** 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. The five year objectives are:
 - Inspect **1,500** properties and provide follow-up on prior years' inspections;
 - Continue aggressively enforcing overcrowding ordinances;
 - Encourage property owners, particularly LMI owners within the Focus Area, to apply for no-interest, self-forgiving loans;
 - Provide **175** self-forgiving housing rehabilitation loans to LMI homeowners residing within the Focus Area;
 - Provide **50** Hazard elimination loans to homeowners residing outside of the Focus Area; and
 - Provide housing rehabilitation self-forgiving loans to LMI homeowners residing outside the focus area, on an as needed/emergency basis.
- **Priority Activity #2:** 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). The five year objectives are:

- Acquire, in conjunction with the Redevelopment Authority of the City of Allentown (RACA), at least **25** vacant properties for use in homeownership programs;
 - Allocate acquired properties to nonprofits, including the Housing Association and Development Corporation and Alliance for Building Communities and Habitat for Humanity of the Lehigh Valley;
 - Assist **100** moderate income households in obtaining funds necessary for down payments and closing costs; and
 - Develop new programs to encourage potential homeowners to buy properties in the Focus Area.
- **Priority Activity #3:** To increase the knowledge and skills necessary for residents to own and maintain their own home. The five year objectives are:
- Educate at least **300** families, particularly targeting LMI households, through the Home Ownership Counseling Program.
- **Priority Activity #4:** To support the provision of decent, safe, and affordable rental housing with the City and on a regional basis. The five year objectives are:
- Rehabilitate **50** units; and
 - Systematically inspect all rental units within the city through the Rental Unit Inspection Program, which is not funded with CDBG dollars.
- **Priority Activity #5:** 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, to assist residents of the City in imminent danger of becoming homeless, and to assist residents in a continuum to find permanent housing. The five year objectives are:
- Provide supportive services such as counseling, case management, housing placement, and emergency rent assistance;
 - Provide **10** loans to LMI homeowners, specifically the elderly and disabled, for adaptive rehabilitation;
 - Aggressively seek additional funding sources for supportive housing for special needs populations;
 - Work closely with homeless service providers to meet the shelter and service needs of the homeless on a regional level; and
 - Assist regional service providers in connecting the homeless with permanent supportive housing solutions.

The City will concentrate its efforts on neighborhoods and districts within the Focus Area comprising the downtown area. By capitalizing on these ongoing activities, the City of Allentown can incorporate new affordable housing opportunities into privately and publicly funded revitalization initiatives.

2. Basis for Determination

According to www.trulia.com, the median sales price for all housing types in Allentown was \$140,000 in the third quarter of 2009. The demand for affordable sales units far exceeds the number of units available and on the market in an

affordable price range. Through the City's planned initiatives, more eligible homebuyers can achieve homeownership within their financial means.

The City is focusing resources on the downtown neighborhoods, particularly within the Focus Area, in an effort to further revitalize these areas. Emphasis will be placed on creating new affordable housing opportunities in these neighborhoods for both renters and owners, while improving both transportation and recreational infrastructure that contributes to quality of life.

3. Basis for Assigning Priority

The priority housing needs were developed by:

- Weighing the severity of the need among all groups and subgroups;
- Analyzing the current social, housing, and economic conditions;
- Analyzing the relative needs of LMI families;
- Assessing the resources likely to be available over the next five years; and
- Evaluating input from focus group sessions, interviews, service provider surveys, municipal departmental staff, and public hearings

4. Obstacles to Meeting Underserved Needs

The primary obstacle which may impede the City's ability to provide decent, safe, and affordable housing is the economy. Residents need steady, well-paying jobs to afford homeownership and rental costs. Regardless of the type of programs the City may offer, residents require a steady income for these programs to be successful. In addition, educational and cultural barriers may also prove to be a deterrent. Many residents lack the language and financial skills necessary to successfully master rental and homebuying procedures. A third and final barrier is the limited financial resources available to assist housing programs.

The success of addressing the priorities of "preserving and improving the quality of life in Allentown's neighborhoods" and "promotion of civic and neighborhood pride, and respect for one's neighbors" depends on the City's ability to work closely with residents, neighborhood groups, and community organizations. One obstacle to meeting the needs of the communities is the difficulty inherent in trying to develop a consensus in the culturally diverse neighborhoods within the City. In addition, limited financial resources may prove to be an obstacle to meeting underserved needs.

Housing Market Analysis (91.210)

*Please also refer to the Housing Market Analysis Table in the Needs.xls workbook

1. Based on information available to the jurisdiction, describe the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing; the housing stock available to serve persons with disabilities; and to serve persons with HIV/AIDS and their families. Data on the housing market should include, to the extent information is available, an estimate of the number of vacant or abandoned buildings and whether units in these buildings are suitable for rehabilitation.
2. Describe the number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, (i.e. expiration of Section 8 contracts).
3. Indicate how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units. Please note, the goal of affordable housing is not met by beds in nursing homes.

Note: The required Housing Market Analysis Table is included in Additional Information – Appendix A.

1. Characteristics of the Housing Market

The rate of growth in Allentown's housing stock has been significantly slower than that of Lehigh County and of Pennsylvania as a whole. In 1990, there were 45,636 total housing units, 56.6% of which were owner-occupied. This number grew by only 324 units between 1990 and 2000, an increase of 0.7%. By comparison, during this decade, the total housing stock in Lehigh County and Pennsylvania grew at 8.9% and 6.3%, respectively.

The Census Bureau's American Community Survey estimates that the housing stock in Allentown decreased to 44,664 units by 2008, with the decrease spread evenly across owner-occupied, renter-occupied, and vacant properties. Between 2000 and 2008, the number of housing units in Allentown decreased by 2.8%, compared to increases of 7.4% in Lehigh County and 4.7% across Pennsylvania.

In total, over the 18-year period between 1990 and 2008, Allentown's housing stock is estimated to have decreased by 972 units, or 2.1%. This stands in contrast to the increases in Lehigh County (17.0%) and across Pennsylvania (11.3%).

HUD's State of the Cities Data System maintains data on local building permits. As shown in the following table, Allentown issued 681 building permits, all of which were for single family units.

Residential Building Permits Issued, 2000-2008

Units by structure type:	2000	2001	2002	2003	2004	2005	2006	2007	2008
Single-family (attached or detached)	76	74	68	51	97	57	154	87	17
Multi-family	0	0	0	0	0	0	0	0	0
Two-unit	0	0	0	0	0	0	0	0	0
Three- and four-unit	0	0	0	0	0	3	0	0	0
Five or more units	0	0	0	0	0	0	0	0	0
Total	76	74	68	51	97	57	154	87	17

Source: U.S. Department of Housing and Urban Development, SOCDs Building Permits Database

The 2000 Census reported that there were 45,960 housing units in Allentown, of which 27,844 (60.6%) were single-family attached or detached units. An additional 17,995 of the units (39.2%) were contained in multi-family structures of two or more units. The following table provides a review of units per structure and mobile homes for the City, County, and State.

Units per Structure, 2000

	Total Units	Single-family units (detached and attached)	Multi-family units					Mobile home	Boat, RV, van, etc.
			2 to 4	5 to 9	10 to 19	20 or more	Total		
Allentown	45,960	27,844	8,082	3,099	3,284	3,530	17,995	121	0
Lehigh County	128,910	92,725	12,782	6,352	6,615	7,238	32,987	3,183	15
Pennsylvania	5,249,750	3,875,644	515,543	179,909	131,691	283,714	1,110,857	258,551	4,698

Source: Census 2000, SF3 (H30)

Occupancy and Tenure of Housing Units

In 2000, Allentown contained 42,032 occupied housing units and 3,928 vacant units, a vacancy rate of 8.5%. This represents a significant increase in vacancy from 1990, when the U.S. Census reported 2,861 vacant units and a vacancy rate of 6.3%. This increase possibly can be attributed to changing demographics in the City of Allentown; although the population rose slightly during the decade, this increase was mainly accommodated by the increased average household size. The 2008 estimate indicates that since 2000 the number of vacancies has decreased by 302 (7.7%) to 3,626, resulting in a vacancy rate of 8.1%.

Compared to the state and county, Allentown’s homeownership rate is very low. The 2000 Census reported that 22,286 (53.0%) of the City’s 42,032 occupied housing units were owner-occupied, compared to a homeownership rate of 56.6% in 1990. The rate of owner-occupancy in Lehigh County was 69.3% in 1990 and 68.8% in 2000, while the rate of owner-occupancy statewide was 70.6% in 1990 and 71.0% in 2000. These trends held steady through 2008, with the City (53.1%), County (70.2%), and State (70.8%) all showing relatively little variation. The following table reviews occupancy and tenure for Allentown’s housing units in 1990, 2000, and 2008.

Occupancy and Tenure, 1990-2008

	Housing Units		Owner-Occupied		Renter-Occupied		Vacant	
	Total	Occupied	Total	% of Occupied	Total	% of Occupied	Total	% of Total
1990	45,636	42,775	24,230	56.6%	18,545	43.4%	2,861	6.3%
2000	45,960	42,032	22,286	53.0%	19,746	47.0%	3,928	8.5%
2008	44,664	41,038	21,780	53.1%	19,258	46.9%	3,626	8.1%

Source: 1990 U.S. Census, SF1 (H001,H002,H003); Census 2000, SF3 (H1,H6,H7); U.S. Census Bureau, 2008 American Community Survey (B25001, B25002,B25003)

Median Housing Sales Price

According to www.trulia.com, the median sales price for a one- to four-bedroom home in Allentown during the third quarter of 2009 was approximately \$140,000. A different source, www.city-data.com indicates that in the third quarter of 2009 the median sales price for a single-family home in Lehigh County was approximately \$180,000. Compared to the surrounding county, recent housing prices in Allentown are affordable.

Rental Rates

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 2009. In the Allentown-Bethlehem-Easton HMFA, the Fair Market Rent (FMR) for a two-bedroom apartment is \$853. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn \$2,843 monthly or \$34,120 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of \$16.40.

In the Allentown-Bethlehem-Easton HMFA, a minimum wage worker earns an hourly wage of \$7.15. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 92 hours per week, 52 weeks per year. Or, a household must include 2.3 minimum wage earner(s) working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

In Allentown-Bethlehem-Easton HMFA, the estimated mean (average) wage for a renter is \$12.74 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 51 hours per week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.3 worker(s) earning the mean renter wage in order to make the two-bedroom FMR affordable.

Monthly Supplemental Security Income (SSI) payments for an individual are \$674 in the Allentown-Bethlehem-Easton HMFA. If SSI represents an individual's sole source of income, \$202 in monthly rent is affordable; the FMR for a one-bedroom is \$721 and the FMR for a studio is \$592.

Housing Condition – Age of Unit, Lacking Complete Facilities, Year Built

Using indicators of housing deficiency available from the 2000 Census, 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. The 2000 Census reported that 17,436 (78.2%) owner properties and 11,016 (55.8%) renter properties were built prior to 1960 in Allentown.

The Census Bureau defines complete plumbing facilities as hot and cold piped water, a bathtub or shower, and a flush toilet. Units without complete plumbing facilities generally indicate substandard housing conditions. Among owner units in Allentown, only 97 (0.4%) lacked complete plumbing in 2000. There were 196 (1.0%) renter units lacking complete plumbing.

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. In 2000, there were 421 owner-occupied housing units (1.9%) with more than one person per room and 1,397 (7.1%) renter-occupied units.

The following tables summarize owner-occupied and renter-occupied deficiency types in the City, compared to the County and State.

Housing Quality Indicators among Owner-Occupied Units, 2000

	Total Housing Units	Total Owner-Occupied Units	Units Built Prior to 1960		Units Lacking Complete Facilities		Overcrowded Units	
			#	%	#	%	#	%
Allentown	42,032	22,286	17,436	78.2%	97	0.4%	421	1.9%
Lehigh County	121,906	83,896	42,100	50.2%	206	0.2%	678	0.8%
Pennsylvania	4,777,003	3,406,167	1,832,200	53.8%	14,146	0.4%	36,835	1.1%

Source: Census 2000, SF3 (H20, H36, H48)

Housing Quality Indicators among Renter-Occupied Units, 2000

	Total Housing Units	Total Renter-Occupied Units	Units Built Prior to 1960		Units Lacking Complete Facilities		Overcrowded Units	
			#	%	#	%	#	%
Allentown	42,032	19,746	11,016	55.8%	196	1.0%	1,397	7.1%
Lehigh County	121,906	38,010	18,432	48.5%	353	0.9%	1,885	5.0%
Pennsylvania	4,777,003	1,370,836	762,556	55.6%	10,304	0.8%	54,310	4.0%

Source: Census 2000, SF3 (H20, H36, H48)

Vacant For-Sale Units Affordable to LMI Households

CHAS Data 2000 provided data on the number of dwelling units that were vacant and for-sale or for-rent to households by income category. While this dataset is very dated, there is no other current source for this information. The City recognizes that current housing market conditions make this data obsolete for all practical purposes. However, HUD requires the inclusion and use of this data in the CP.

CHAS Data based on the 2000 Census reported a total of 575 vacant for-sale units in Allentown. The following table lists the number of vacant for-sale units that are affordable to low, very low, and extremely low income households in 2000.

Vacant For-Sale Units Affordable to LMI Households, 2000

Unit Size	Number Affordable to Households with Incomes		
	0-30% of Median	31-50% of Median	51-80% of Median
0-1 bedroom	0	25	30
2 bedrooms	0	55	35
3 bedrooms	0	345	85
Total	0	425	150

Source: HUD SOCDs CHAS Data 2000

Of the 575 units:

- There were no sales units available and affordable to households below 30% of MFI;
- There were 425 units (73.9%) available and affordable to households with incomes between 31% and 50% of MFI; and
- There were 150 units (26.1%) available and affordable to households with incomes between 51% and 80% of MFI.

Vacant For-Rent Units Affordable to LMI Households

CHAS Data 2000 also reported that there were a total of 1,825 vacant for-rent units in Allentown. The following table lists the number of vacant for-rent units that are affordable to extremely low, very low, and low income households.

Vacant For-Rent Units Affordable to LMI Households, 2000

Unit Size	Number Affordable to Households with Incomes		
	0-30% of Median	31-50% of Median	51-80% of Median
0-1 bedroom	105	340	215
2 bedrooms	100	370	280
3 bedrooms	160	225	30
Total	365	935	525

Source: HUD SOCDs CHAS Data 2000

Of the 1,825 units:

- There were 365 (20.0%) units available and affordable to households below 30% of MFI;
- There were 935 units (51.2%) available and affordable to households with incomes between 31% and 50% of MFI; and
- There were 525 units (28.8%) available and affordable to households with incomes between 51% and 80% of MFI.

2. Number and Targeting of Assisted Units

In Allentown, the following statistics describe facilities receiving assistance under various HUD programs:

- **22** facilities with **1,237** units in the City’s Section 8 program; and
- **1** facility with **131** units in the City’s Section 202 program.

There are no units that are expected to be lost during the program year.

1. Impact of Housing Market on Use of Funds

The National Low Income Housing Coalition (NLIHC) compiles analyses on fair market rent (FMR) using information compiled from HUD data and U.S. Census Bureau statistics. In 2009, the annual median income needed to afford rent in a two-bedroom house in the Allentown-Bethlehem-Easton HMFA at fair market rent was \$34,120. The estimated median household income (MHI) in 2008 for renters in the HMFA was \$33,542, meaning a renter household would need more income than it receives to be able to afford a two-bedroom apartment at fair market rent. The rent affordable at MHI for renters in the HMFA was \$839, which would enable them to rent a one-bedroom apartment, which has a FMR of \$721. Fifty percent of renters in the HMFA were not able to afford a two-bedroom apartment at FMR. The table below indicates some of the fair market rent statistics presented by the NLIHC.

From this data, it is evident that affordable housing is a major issue in Allentown, and one towards which program funds should be directed. Housing funds received through CDBG and HOME funds will help bridge some of the financial gap for this large percentage of households in Allentown, while making housing more affordable for those making less than the median household income in Allentown.

Housing Classification	FMR	Needed to Afford FMR			
		Annual Income	% of Family AMI	Work Hrs/Wk at Min. Wage	Work Hrs/Wk at Mean Renter Wage
Zero-Bedroom	\$592	\$23,680	34%	64	36
One-Bedroom	\$721	\$28,840	41%	78	44
Two-Bedroom	\$853	\$34,120	49%	92	51
Three-Bedroom	\$1,104	\$44,160	63%	119	67
Four-Bedroom	\$1,168	\$46,720	67%	126	71

Source: National Low Income Housing Coalition, 2009

Specific Housing Objectives (91.215 (b))

2. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.
3. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

4. Priorities and Objectives

The City of Allentown will invest its entitlement funds to create new and preserve existing affordable housing for households below 80% of median income in the neighborhoods within its Focus Area. Towards this end, the City has established the following housing priorities and objectives:

- **Priority Activity #1:** 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. The five year objectives are:
 - Inspect **1,500** properties and provide follow-up on prior years’ inspections;
 - Continue aggressively enforcing overcrowding ordinances;
 - Encourage property owners, particularly LMI owners within the Focus Area, to apply for no-interest, self-forgiving loans;
 - Provide **175** housing rehabilitation self-forgiving loans to LMI homeowners residing within the Focus Area;
 - Provide **50** Hazard elimination loans to LMI homeowners residing outside of the Focus Area;
 - Provide housing rehabilitation self-forgiving loans to LMI homeowners residing outside the focus area, on an as needed/emergency basis.
- **Priority Activity #2:** 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). The five year objectives are:
 - Acquire, in conjunction with the Redevelopment Authority of the City of Allentown (RACA), at least **25** vacant properties for use in homeownership programs;
 - Allocate acquired properties to nonprofits, including the Housing Association and Development Corporation, Alliance for Building Communities and Habitat for Humanity of the Lehigh Valley;
 - Assist **100** moderate income households in obtaining funds necessary for down payments and closing costs; and
 - Develop new programs to encourage potential homeowners to buy properties in the Focus Area.
- **Priority Activity #3:** To increase the knowledge and skills necessary for residents to own and maintain their own home. The five year objectives are:

- Educate at least **300** families, particularly targeting LMI households, through the Home Ownership Counseling Program.
- **Priority Activity #4:** To support the provision of decent, safe, and affordable rental housing with the City and on a regional basis. The five year objectives are:
 - Rehabilitate **50** units; and
 - Systematically inspect all rental units within the city through the Rental Unit Inspection Program, which is not funded with CDBG dollars.
- **Priority Activity #5:** 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, to assist residents of the City in imminent danger of becoming homeless, and to assist residents in a continuum to find permanent housing. The five year objectives are:
 - Provide supportive services such as counseling, case management, housing placement, and emergency rent assistance;
 - Provide **10** loans to LMI homeowners, specifically the elderly and disabled, for adaptive rehabilitation;
 - Aggressively seek additional funding sources for supportive housing for special needs populations;
 - Work closely with homeless service providers to meet the shelter and service needs of the homeless on a regional level; and
 - Assist regional service providers in connecting the homeless with permanent supportive housing solutions.

5. Funds Reasonably Expected to be Available

The City of Allentown has identified a wide range of resources that can be invested to support the City's affordable housing initiatives. A summary of these resources, focusing on housing, is included below.

Federal Programs

- Community Development Block Grant Program (including program income)
- HOME Investment Partnerships Program (including program income)
- Emergency Shelter Grants Program
- Section 8 Housing Choice Voucher
- Public Housing HOPE VI Grants
- Neighborhood Stabilization Program funds
- Low Income Housing Tax Credits
- Department of Justice Weed & Seed Program

State Resources

- PennHOMES
- Pennsylvania Housing Finance Agency
- State Low Income Housing Tax Credits

Lehigh County Resources

- Act 137 Affordable Housing Trust Fund

Private Resources

- Federal Home Loan Bank

Needs of Public Housing (91.210 (b))

In cooperation with the public housing agency or agencies located within its boundaries, describe the needs of public housing, including the number of public housing units in the jurisdiction, the physical condition of such units, the restoration and revitalization needs of public housing projects within the jurisdiction, and other factors, including the number of families on public housing and tenant-based waiting lists and results from the Section 504 needs assessment of public housing projects located within its boundaries (i.e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25). The public housing agency and jurisdiction can use the optional Priority Public Housing Needs Table (formerly Table 4) of the Consolidated Plan to identify priority public housing needs to assist in this process.

Public Housing in Allentown

The Allentown Housing Authority (AHA) currently owns and manages 1,292 conventional public housing units, primarily within 12 separate developments located throughout the City of Allentown. Almost all of the public housing units are occupied, with yearly turnover ranging from zero to 57 units among the 12 developments.

This total includes 79 scattered site units located throughout the City of Allentown. The table below 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 96-100%. AHA reports that the only way to further increase the occupancy rate would be to renovate/rehabilitate the units faster than the one week average that now occurs. The Cumberland Gardens Apartments, with 200 family units, has the largest annual turnover rate at 57 units.

The public housing facilities located in Allentown as listed in the following table. The facilities are listed by the age of the building(s) and the number of units.

Allentown Public Housing Inventory						
Development	Year of Initial Occupancy	# of Elderly Units	# of Family Units	Total Units	Occupancy Rate	Annual Turnover
GROSS TOWERS	1967	147	0	147	98%	39
CUMBERLAND GARDENS	1971	16	200	216	97%	57
WALNUT MANOR	1972	150	0	150	98%	26
700 BUILDING	1975	139	0	139	99%	19
TOWERS EAST	1975	129	0	129	100%	17
LIITTLE LEHIGH	1975	0	76	76	99%	23
CENTRAL PARK	1976	87	0	87	100%	4
SCATTERED SITES	1983-1986	0	79	79	96%	11
OVERLOOK PARK 1A	2007	0	80	80	100%	0
OVERLOOK PARK 1B	2007	0	79	79	100%	0
OVERLOOK PARK 2A	2008	0	60	60	100%	0
OVERLOOK PARK 2B	2009	0	50	50	100%	0
TOTAL UNITS		668	624	1,292		196

Source: Allentown Housing Authority Survey, 2010

In addition, AHA owns and manages 107 units that were acquired and rehabilitated through the federal Section 8 Substantial Rehabilitation Program. Project-based vouchers are used to help pay off AHA debt. 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 also 80 new public housing units and an additional 79 rental units that are eligible for Section 8 Housing Choice Vouchers that were recently completed in a new development named Overlook Park. Overlook Park is 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. As the rental development is now finished, 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 new 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. There will also be 53 detached homes that are currently being built and sold to low and moderate income residents. Of the 322

total units, 80 will be public housing, 79 will be affordable rental units, and 53 will be non-HUD subsidized, homeownership units. AHA procured the Catholic Social Agency to provide case management and Community Supportive Services, and provide management services. When completed, AHA will have leveraged approximately \$40 million from its partners toward the total cost of the project.

AHA also has plans during the FY2010-2014 period to convert 20 public housing units to the private housing market through first-time homeownership activities. AHA will continue to research ways to add public housing units to its inventory via acquisition and new construction/rehabilitation activities using Low Income Housing Tax Credit financing, among other sources of funds.

Condition of Units & Restoration/Revitalization Needs of Projects within Allentown

AHA reports that as of 2007, the majority of its housing stock is in good condition and meets all HUD standards and City housing codes. Only Cumberland Garden and several of the scattered site units are in need of major rehabilitation. This work will include reducing bedroom counts and creating accessible apartments where possible.

Over the last few years, the focus has been on making physical upgrades to all its family and elderly public housing developments through the annual Capital Fund grant (approximately \$2 million annually). Ongoing repairs and modernization activities include kitchen and bathroom modernizations, new HVAC and water improvements, new sidewalks, curbs, and roofing. As a result of recent receipt of additional funds through the federal Stimulus Bill, additional pressing repairs will be possible. Plans are to request funding for elderly services as well as new housing construction funding from the federal government in the future.

The major challenge faced by AHA is the age of the majority of its buildings. As seen in the previous table, most (73.1%) of the housing structures were built in the 1960's and 1970's, and the heating systems, distribution systems, and exterior brickwork have suffered. A major rehabilitation will take place soon at the Cumberland Gardens development. Several needs have been identified by 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 gradual deterioration of AHA developments can be seen in the following chart compiled from HUD Inspection Reports, which are available to the public. The difference in inspections scores of seven properties within the city indicates that five properties have seen a slight decrease between inspections completed in 2000 and 2007. Overall, the seven properties have experienced a decrease in the average HUD score from 94.57 to 92.68.

Allentown Housing Authority Properties HUD Inspection Reporting			
Property Name	2000 HUD Score	2007 HUD Score	Change
Central Park	100	95.41	-4.59
Cumberland Gardens	69.5	91.99	22.49
John Gross Towers	99.99	84.26	-15.73
Little Lehigh	92.86	94.99	2.13
Towers East	100	98.6	-1.4
East Wyoming Street Apartments	99.82	91.47	-8.35
Walnut Manor	99.79	92.07	-7.72
Average Score	94.57	92.68	-1.89
<i>Source: HUD Inspection Files</i>			

Section 504 Review Needs within Allentown

AHA last updated its Section 504 needs assessment and transition plan in 2007. Approximately 40 (4%) of all conventional public housing units had been rehabilitated to be in compliance with Section 504 and the Americans with Disabilities Act requirements. This small number is largely due to the age of many of the buildings that comprise the public housing inventory. A portion of these units are available to families with children. There are 105 non-elderly, disabled residents currently living in elderly public housing units.

AHA reports that private landlords for Housing Choice Voucher tenants voluntarily make accessibility accommodations for persons with disabilities. AHA participated in an innovative arrangement with the Mental Health/Mental Retardation (MH/MR) agencies where 20 units in its newest rental development, Overlook Park, are reserved for MH/MR tenants.

Public Housing Tenant Characteristics

As can be seen in the following chart, there are 1240 individuals currently in Allentown’s public housing system. Of these renters with vouchers, 76.8% are extremely low income (<30% AMI), 19.7% are very low income (>30% but <50% AMI), and 3.5% are low income (>50% but <80%). Of current public housing tenants, 420 (33.9%) are small families and 590 (47.6%) are elderly, one- and two-person households. Individuals or families in which someone has a disability account for 633 (51.0%) of public housing tenants. Racially, 88.0% of those in public housing are White, while 56.6% are of Hispanic origin. Finally, 61.3% of those in public housing live in zero- or one-bedroom units. Only 26.6% of public housing residents live in larger, family-sized units of three or more bedrooms.

Allentown Housing Authority Public Housing Tenant Characteristics		
	# of Families	% of Total
Total	1,240	
Extremely Low Income (<30%AMI)	952	76.8%
Very Low (>30% AMI, <50% AMI)	244	19.7%
Low (>50% AMI, <80% AMI)	44	3.5%
Small Family	420	33.9%
Large Family	114	9.2%
Elderly	590	47.6%
Individuals/Families with Disabilities	633	51.0%
Race/Ethnicity		
White	1,091	88.0%
Black	137	11.0%
Hispanic	702	56.6%
Other	21	1.7%
Bedroom Size		
Zero Bedroom	54	4.4%
1 Bedroom	706	56.9%
2 Bedroom	159	12.8%
3 Bedroom	231	18.6%
4 Bedroom	76	6.1%
5+ Bedroom	23	1.9%

Source: Allentown Housing Authority, 2010

Public Housing Waiting List

The public housing waiting list in Allentown is extensive, with a total of 2,918 families waiting for a housing unit as of January 2010. Those in need of public housing units in the City of Allentown wait an average of one year to be placed in a housing unit. The waiting list is currently open to new applications.

As seen in the following table, the majority of applicants (84.3%) have incomes that are 30% or less of the area median income. Most are small families and almost a quarter (24.0%) have a family member who is disabled. Most of the applicants are interested in a two or three bedroom apartment.

ALLENTOWN HOUSING AUTHORITY PUBLIC HOUSING WAITING LIST CHARACTERISTICS

	# of Families	% Total
WAITING LIST TOTAL	2,918	---
Extremely Low Income (<30%AMI)	2,459	84.3%
Very Low (>30% AMI, <50% AMI)	346	11.9%
Low (>50% AMI, <80% AMI)	113	3.9%
Small Family	2,613	89.5%
Large Family	305	10.5%
Elderly	152	5.2%
Individuals/Families with Disabilities	699	24.0%
RACE/ETHNICITY*		
White	2,168	77.3%
Black	637	22.7%
Hispanic	1,971	70.3%
Other	0	0.0%
BEDROOM SIZE		
1 Bedroom	201	7.0%
2 Bedroom	1,561	54.7%
3 Bedroom	924	32.4%
4 Bedroom	154	5.4%
5+ Bedroom	14	0.5%
* Racial data may not add up to Total # of Families since Hispanic is an ethnicity and respondents may be of any race.		
Source: Allentown Housing Authority, 2010		

AHA has established preferences for admission to both the public housing and HCV programs, which are prioritized as follows:

1. Involuntary Displacement (disaster, government action, action of housing owner, inaccessibility, property disposition)
2. Victims of domestic violence, substandard housing, homelessness, or high rent burden
3. Residents who live and/or work in the jurisdiction

Housing Choice Voucher Program (formerly Section 8)

A major source of assistance to make rental housing affordable in Allentown is the federal Housing Choice Voucher Program (formerly Section 8), which is administered by AHA. The Housing Choice Vouchers are all tenant-based. According to AHA, the number of vouchers that are currently being utilized by eligible families is 1,237. HCV vouchers can pay up to 100% of the Fair Market Rent allowance for the area. AHA plans to apply for additional HCVs for its Family Unification program from the federal government.

AHA has discontinued processing Housing Choice Voucher applications with an approximately 24-month wait for those currently on the list. The HOPE VI housing

development referenced above is eligible to receive 79 vouchers in order to assist former public housing tenants to live in the new Overlook Park rental units.

Approximately 100 families of the 1,237 voucher holders “port-out” of the City, meaning they lease rental units outside the City. A major need of the HCV program cited by AHA is the lack of affordable rental units outside of the downtown census tracts. In addition, the City of Allentown operates a Rental Licensing Program that inspects rental properties within the City.

As can be seen in the following chart, 80.0% of those renters with vouchers within Allentown are extremely low income (<30% AMI), with 18.9% being very low income (>30% but <50% AMI). Only 203 (16.4%) of renters currently receiving voucher assistance are elderly, and 711 (57.5%) are either individuals or families in which someone has a disability. Racially, 78.8% of those with vouchers are White, while 66.5% are of Hispanic origin. As noted below the table, Hispanic origin is treated separately from other racial categories, and thus percentages may not total 100%. Finally, only 17.3% of those with vouchers have rental units with four or more bedrooms. Currently, the most common units are three-bedroom, which are utilized by 32.6% of the voucher holders.

Allentown Housing Authority Housing Choice Voucher Holders Characteristics		
	# of Families	% of Total
Total	1,237	
Extremely Low Income (<30%AMI)	989	80.0%
Very Low (>30% AMI, <50% AMI)	234	18.9%
Low (>50% AMI, <80% AMI)	14	1.1%
Small Family	679	54.9%
Large Family	184	14.9%
Elderly	203	16.4%
Individuals/Families with Disabilities	711	57.5%
Race/Ethnicity		
White	975	78.8%
Black	244	19.7%
Hispanic	823	66.5%
Other	18	1.5%
Bedroom Size		
Zero Bedroom	10	0.8%
1 Bedroom	341	27.6%
2 Bedroom	269	21.7%
3 Bedroom	403	32.6%
4 Bedroom	147	11.9%
5 Bedroom	67	5.4%

Source: Allentown Housing Authority, 2010

Housing Choice Voucher Waiting List

Currently, there are 4,133 families on AHA’s Housing Choice Voucher waiting list, which is about a two year wait. The waiting list is currently open. Of those applicants, 77.4% are extremely low income, 22.6% are very low income, and 0%

are low income. The racial group most represented on the waiting list is White applicants, who comprise 78.0% of the list. An additional 22.0% are Black, and 64.0% classified themselves as being of Hispanic origin.

Allentown Housing Authority HCV Waiting List Characteristics

	# of Families	% Total
WAITING LIST TOTAL	4,133	---
Extremely Low Income (<30%AMI)	3,201	77.4%
Very Low (>30% AMI, <50% AMI)	932	22.6%
Low (>50% AMI, <80% AMI)	0	0.0%
Small Family	3,383	81.9%
Large Family	436	10.5%
Elderly	314	7.6%
Individuals/Families with Disabilities	1,352	32.7%
RACE/ETHNICITY*		
White	3,248	78.0%
Black	918	22.0%
Hispanic	2,665	64.0%
Other	0	0.0%
* Racial data may not add up to Total # of Families since Hispanic is an ethnicity and respondents may be of any race.		
Source: Allentown Housing Authority, 2010		

The Homeownership Mortgage Program

Allentown Housing Authority has begun the planning process for a HCV-homeownership program. Aspects of the program that have already been decided include the provision of homeownership counseling by AHA and the requirement of a 3% down payment by the prospective homebuyer, with 1% of the down payment coming from the applicant.

AHA is looking to convert 20 units of existing single-family public housing units throughout scattered sites into homeownership sometime in the near future. Rehabilitation and resale of these units to eligible HCV or public housing families will be the goal of the effort. Lessons will be learned from the homeownership phase of the Hope VI project referenced above.

Privately-Assisted Rental Housing in Allentown

In addition to public housing, there are 1,478 private, publically-assisted rental housing units available to lower income households within the City of Allentown, as can be seen in the following table. The majority (77.9%) of these units are reserved for rent by the elderly. There are two developments with a total of 32 units that are designated for disabled tenants.

There are also approximately 40 additional subsidized units located throughout the City in buildings with five or fewer units, all of which are for general use by all lower income people. These are not shown in the table below.

Subsidized, Multi-Family Affordable Housing in Allentown

Project Name	Total Units	Target Population	Accessible Units	Funding Source
1339 West Allen St	25	General	0	LIHTC
314 North Church St	8	General	0	LIHTC
715-723 East Hamilton St	8	General	0	LIHTC
Allentown Center Square - 15 North 7th St	63	Elderly	0	PennHOMES/LIHTC
B'nai Brith	271	Elderly	0	HUD
B'nai Brith West	120	Elderly	0	HUD
Episcopal House	210	Elderly	0	HUD
Gordon Street Apartments	20	Other	20	PennHOMES/LIHTC
Hamilton Street Apartments	30	Elderly	4	PennHOMES/LIHTC
Hart Rentals - Phase 1	80	General	0	LIHTC
Little Lehigh Manor	110	Elderly	0	HUD
Market Street Apartments	7	General	3	LIHTC
Mountainville Manor Apartments	20	Elderly	3	LIHTC
North Fifth Street Apartments	8	General	0	LIHTC
Overlook Park (HART II)	79	General	0	HUD/LIHTC
Phoebe Apartments	132	Elderly	0	HUD
South Sixth Street Rehab 1	36	Elderly	0	HUD
Tenth Street	23	General	2	PennHOMES/LIHTC
Towne House Apartments	160	Elderly	24	PennHOMES/LIHTC
Turner Street Apartments	12	Other	12	PennHOMES/LIHTC
Victoria Village	49	General	3	PHFA bond
Woodward Street Apartments	7	General	0	LIHTC
Total Multi-Family Apartments	1,478		71	

Source: PA Housing Finance Agency, 2010

Allentown Multi-Family HUD Susidized Housing Inspection Reports

Property Name	Address	Inspection Score	Inspection Date
LITTLE LEHIGH MANOR	824 Jackson St	100	7/22/2003
LITTLE LEHIGH MANOR	824 Jackson St	66.69	1/25/2007
LITTLE LEHIGH MANOR	824 Jackson St	94.19	6/17/2009
SOUTH SIXTH STREET REHAB II	129 S 6th St	98.33	7/11/2002
SOUTH SIXTH STREET REHAB II	129 S 6th St	82.25	10/7/2006
SOUTH SIXTH STREET REHAB II	129 S 6th St	90.11	8/22/2008
PHOEBE APTS	1901S W Linden St	92.43	10/17/2001
PHOEBE APTS	1901S W Linden St	90.25	4/27/2005
PHOEBE APTS	1901S W Linden St	97.34	7/7/2009
SCATTERED SITES	1339 W Allen St	66.5	8/14/2003
SCATTERED SITES	1339 W Allen St	19.22	11/18/2004
SCATTERED SITES	1339 W Allen St	42.96	11/4/2005
SCATTERED SITES	1339 W Allen St	61.77	5/22/2007
SCATTERED SITES	1339 W Allen St	84.11	6/23/2009
SOUTH SIXTH ST REHAB I	102 S 6th St	97.1	8/14/2003
SOUTH SIXTH ST REHAB I	102 S 6th St	79.77	11/20/2006
SOUTH SIXTH ST REHAB I	102 S 6th St	88.12	2/13/2009

Source: HUD Inspection Files, 2009

To further underscore the point that assisted housing in the City of Allentown is in need of attention, the above table shows HUD’s inspection scores for 352 units, or almost one quarter of the 1,478 private, HUD-subsidized units over the course of five years. Three of the five developments’ HUD inspection scores have declined over the inspection periods.

Public Housing Strategy (91.210)

1. Describe the public housing agency's strategy to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the public housing agency (including families on the public housing and section 8 tenant-based waiting list), the public housing agency's strategy for addressing the revitalization and restoration needs of public housing projects within the jurisdiction and improving the management and operation of such public housing, and the public housing agency's strategy for improving the living environment of extremely low-income, low-income, and moderate families residing in public housing.
2. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake to encourage public housing residents to become more involved in management and participate in homeownership. (NAHA Sec. 105 (b)(11) and (91.215 (k))
3. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation. (NAHA Sec. 105 (g))

1. Maintenance of Housing and a Suitable Living Environment

The agency in charge of public housing in Allentown is the Allentown Housing Authority (AHA). AHA currently provides 1,240 units of public housing in the City of Allentown. In addition, AHA manages 1,237 Section 8/Housing Choice Vouchers throughout Allentown. AHA utilizes HUD guidelines for income targeting as a means of serving lower income City residents.

HUD has deemed AHA as a "High Performer" based on a rating analysis of twelve factors including vacancies, modernization, rent collection, unit turnaround, and condition of units. AHA is meeting the goals established in its existing 5-Year Plan in the following ways:

- Striving to maintain HUD's High Performer Classification rating;
- Meeting federal economic guidelines for new tenants;
- Maintaining low vacancy rates through efficient operational procedures;
- Beginning the planning process for a voucher home ownership program;
- Continuing the community/resident programs previously underwritten by the Public Housing Drug Elimination Program through use of operating funds and Capital Funds.
- Continued improvement of the public housing properties through the Capital Fund program; and
- Moving forward with the HUD-approved HOPE VI/mixed-finance revitalization activities of the Hanover Acres and Riverview Terrace public housing site

Allentown Housing Authority's mission is:

To assist the community by providing equal opportunity for housing in decent, safe, and sanitary conditions for the elderly, families, and persons with

disabilities within the prescribed federal economic guidelines. In conjunction with this mission will be the ongoing effort to promote economic self-sufficiency and an improved quality of life within the community.

According to the Five-Year Plan for FY2006-2010, AHA pledged the following:

Goal I - Maintain housing and a suitable living environment by:

- Reducing public housing vacancies;
- Leveraging private or other public funds to create additional housing opportunities;
- Leveraging a future percentage of the Housing Authority annual Capital Funds appropriation by participating in a statewide issuance of Capital Fund Securitized Revenue Bonds in order to increase the pool of public funds available to rehabilitate, modernize, acquire, or create additional housing opportunities; and
- Acquiring or building units or developments.

Goal II - Improve the quality of assisted housing by:

- Continuing to improve public housing management;
- Continuing to improve voucher management;
- Renovating or modernizing public housing units;
- Demolishing or disposing of obsolete public housing;
- Providing replacement public housing; and
- Providing replacement vouchers.

Goal III - Increase assisted housing choices by:

- Conducting outreach efforts to potential voucher landlords;
- Implementing voucher homeownership program;
- Implementing public housing or other homeownership programs; and
- Implementing public housing site-based waiting lists.

Goal IV - Provide an improved living environment by:

- Designating developments or buildings for particular resident groups (elderly and/or persons with disabilities);
- Continuing efforts to reduce illegal drug activities and crime by supporting programs provided by the Boys and Girls Club activities and Neighborhood Police Programs, in conjunction with the City of Allentown;
- Continuing support for the Tenant Council organizations; and
- Providing referrals to social service agencies as appropriate.

Goal V - Promote self-sufficiency and asset development of assisted households by:

- Increasing the number and percentage of employed persons in assisted families;
- Providing or attracting supportive services to improve assistance recipients' employability; and
- Providing or attracting supportive services to increase independence for the elderly or families with disabilities.

Goal VI - Ensure equal opportunity and affirmatively further fair housing by:

- Undertaking affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and/or disability; and
- Undertaking affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and/or disability.

As the demand for subsidized housing exceeds the supply, AHA plans to continue to work with City of Allentown to construct/rehabilitate scattered site rental units. It will also work together with the four other public housing authorities in the Lehigh Valley to increase the number of affordable housing units. A good relationship exists between AHA and the City of Allentown, especially with the zoning and code offices which have been very helpful with planning and construction of the Hope VI development, as well as environmental reviews for AHA federal funding awards. Police and Fire departments continue to provide tremendous service to AHA developments and its tenants.

2. Public Housing Resident Participation

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 AHA Executive Director.

3. Troubled Status

NOT APPLICABLE. AHA is not designated as a troubled agency by HUD.

Barriers to Affordable Housing (91.210 (e) and 91.215 (f))

1. Explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.
2. Describe the strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing, except that, if a State requires a unit of general local government to submit a regulatory barrier assessment that is substantially equivalent to the information required under this part, as determined by HUD, the unit of general local government may submit that assessment to HUD and it shall be considered to have complied with this requirement.

1. Public Policy Impacts on Affordable Housing

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.

The City is proud of the inclusive nature of its zoning ordinance and does not believe that it impacts negatively upon the ability to develop, maintain, or improve affordable housing.

The City has six codes that address the issue of the health and safety of residential units. Four of the six are based on national standards developed the Building Officials and Code Administrators International (BOCA): building, plumbing, electrical, and fire prevention. In addition, the property rehabilitation and maintenance code and a portion of the City's health code impact the health and safety of residential units, and also are adapted from State and national standards. Since the six codes have been developed in compliance with State and national standards, it seems reasonable to conclude that they do not have a negative impact on the ability to develop, maintain, or improve affordable housing.

By administrative policy, fees are charged for permits or licenses to the extent necessary to recoup the costs of administering and enforcing the various codes. Therefore, fees and charges do not have a negative impact on the ability to develop, maintain, or improve affordable housing.

2. Strategy to Remove or Ameliorate Negative Effects of Public Policies

As indicated above, overall, the policies and ordinances governing the City of Allentown do not have an adverse effect on the ability to develop, maintain, or improve affordable housing. Aside from the tax policies over which the City has little control, Allentown has developed policies and procedures that generally support the development of affordable housing.

HOMELESS

Homeless Needs (91.205 (b) and 91.215 (c))

*Please also refer to the Homeless Needs Table in the Needs.xls workbook

Homeless Needs— The jurisdiction must provide a concise summary of the nature and extent of homelessness in the jurisdiction, (including rural homelessness and chronic homelessness where applicable), addressing separately the need for facilities and services for homeless persons and homeless families with children, both sheltered and unsheltered, and homeless subpopulations, in accordance with Table 1A. The summary must include the characteristics and needs of low-income individuals and children, (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered. In addition, to the extent information is available, the plan must include a description of the nature and extent of homelessness by racial and ethnic group. A quantitative analysis is not required. 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.

Note: The required Homeless Needs Table (formerly HUD Table 1A) is included in Additional Information – Appendix A.

Nature and Extent of Homelessness

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.

In June 2007, the City of Allentown officially completed its **Plan to End Chronic Homelessness by 2017**. The need for the plan surfaced in January of 2006 when representatives of the City of Allentown and the Lehigh County Conference of Churches met to discuss the city's unsheltered homeless. Of particular concern were the unsanitary conditions for homeless persons living underneath the city's Eighth Street Bridge. In order to address these concerns, the Mayor appointed a First Lady's Commission to End Chronic Homelessness charged with developing a ten-year plan to end chronic homelessness in the City. During the plan's development, a total of 53 Commission members met regularly as part of four working committees and a steering committee.

One recommendation of the plan was the creation of the Allentown Commission to End Chronic Homelessness. The Commission is now working to coordinate and support the efforts of all nearby governments, law enforcement and other public safety officials, hospitals, and other public welfare agencies and safety net providers.

The Commission is also working to raise awareness and address homelessness at the state and national levels. Since chronic 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. They also have included working with the Allentown/Northeast Regional Homeless Advisory Board in the completion of the annual Continuum of Care (CoC).

Allentown/Northeast PA Regional Homeless Advisory Board (RHAB)

For the past decade, there has been a federal funding requirement that communities and organizations 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 Allentown/Northeast PA Regional Homeless Advisory Board (RHAB). The Allentown/Northeast RHAB CoC Process is one of four regional efforts created to encompass non-entitlement portions of the state in order to receive homeless assistance from HUD. The region encompasses twelve counties in the northeastern section of Pennsylvania. The entitlement communities of Allentown and Bethlehem, as well as the Lehigh and Northampton Counties, are part of the Pennsylvania Northeast Region Homeless Assistance Process. RHAB CoC has helped secure \$4 million in competitive federal grants for the region to provide homeless housing and support services during its existence.

RHAB 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 single Point-in-Time count; overseeing the various subcommittees and working groups; completing the annual CoC application; 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. Administrative chores required by the CoC process are handled on a voluntary basis by the Valley Housing Development Corporation, a long time participant in the affordable housing arena in the Lehigh Valley.

Currently, representatives of 75 state, local, and county government agencies, non-profit homeless and housing providers, and for-profit organizations meet on a regular basis to address the issues of homelessness in the Northeast region as members of RHAB. The City of Allentown is among those interested parties.

Within the City of Allentown, Point-in-Time surveys have been conducted for several years by the Lehigh County Conference of Churches. During 2005, the first year this was done, a total of 13 unsheltered homeless were identified. Additional Point-in-Time surveys within the City found a total of 26 unsheltered homeless in September 2005 and 33 unsheltered in January 2006. On January 25, 2007, the Conference of Churches identified 28 homeless persons; of those, 15 persons were identified as chronically homeless.

Also during 2005, a study of the region's homeless was conducted by the Lehigh Valley Coalition on Affordable Housing. This study found that of the 2,591 men, women, and children who were housed in the Lehigh Valley's emergency and short-term shelters, over 50% were living in Allentown before seeking shelter and 70.3%

reported Allentown as a place of former residence. The primary reason cited for leaving their place of former residence was non-payment of rent. The report also concluded that a lack of available housing was a significant barrier faced by the chronically homeless who had no income or were extremely low-income and dependent upon some sort of housing subsidy.

The more recent 2007 **Allentown Plan to End Chronic Homelessness by 2017** contains the additional observations about homelessness within the City:

- From 2001 through 2006, the Allentown School District documented in excess of 600 homeless students annually. Research studies indicate that chronically homeless adults experienced homelessness as children.
- In 2004 and 2005, the number of chronically homeless persons in Allentown was 40% higher than predicted.
- At-risk and homeless women and children in Allentown face the reality of insufficient emergency and transitional shelter beds in Allentown.
- Chronically homeless persons require assistance with job/vocational training and job placement opportunities.

The CoC process requires an annual survey of the homeless in the region, both living in the shelters and those living on the street. According to the 2009 Allentown/Northeast PA Point-in-Time survey, there were 738 persons who were homeless in the region during the last ten days of January 2009. The table below shows details of this Point-in-Time survey. The count divided people into households of one or two adults, with and without children, both sheltered and unsheltered.

Allentown/Northeast PA Continuum of Care Homeless Count*				
	Sheltered		Unsheltered	Total
	Emergency Shelter	Transitional Housing		
Households without children	152	86	43	281
Households with children	27	125	0	152
Total Households	179	211	43	433
Total Persons	243	452	43	738

* Count does not include persons or beds in permanent supportive housing

Source: Point-in-Time Survey, January 2009

Of those who met HUD’s definition of homeless, 695 were sheltered and 43 persons were unsheltered. Of those who were homeless and sheltered in January 2009, 243 persons were in emergency shelters in the region and 452 were in a transitional housing program for homeless persons. The January 2009 Point-in-Time survey categorized the people interviewed into subpopulations in the Allentown/Northeast PA region as follows:

	Sheltered	Unsheltered	Total	% of Pop.*
Chronically Homeless	25	32	57	17.6%
Severely Mentally Ill	39	9	48	14.9%
Chronic Substance Abuse	73	14	87	26.9%
Veterans	29	3	32	9.9%
Persons with HIV/AIDS	0	0	0	0.0%
Victims of Domestic Violence	95	0	95	29.4%
Unaccompanied Youth Under 18 y	4	0	4	1.2%
Total	265	58	323	

* Percentage may not add up to 100%, as individuals may check more than one condition

Source: 2009 Continuum of Care

Of the 323 individuals interviewed, the chronically homeless accounted for more than one-sixth of those interviewed. The two largest subpopulations were victims of domestic abuse (29.4%) and chronic substance abusers (26.9%). Approximately 18% of the homeless were unsheltered.

The heavy housing cost burden borne by low income households in the Allentown area contributed to chronic problems of homelessness. Some working-poor families are only able to pay the rent because they have two wage earners, or because the primary wage earner works two jobs. Other families may deal with the problem of high housing costs by doubling up. Such arrangements can be unstable and temporary in nature. Eviction is another reason reported for homelessness. Many homeless cases seeking assistance with the regional social service providers in 2009 reported eviction from non-payment of rent, either by their landlord or the primary tenant in a shared apartment, as the primary reason for becoming homeless. Other than eviction, the most commonly cited reason for family homelessness was domestic violence.

The 2009 Continuum of Care Exhibit 1 Homeless Inventory for the Allentown/Northeast PA RHAB region lists a total of 60 homeless related facilities: 20 emergency shelters, 24 transitional housing facilities, and 16 permanent supportive housing developments. Twenty of these facilities are located within the City of Allentown; they are enumerated in the Homeless Inventory section below.

The Housing Inventory Chart for the Allentown/Northeast PA RHAB region is provided below. It provides data on the number of beds currently located in the region ready to meet the needs of homeless persons and families. A total of 1,243 beds exist in the region, including temporary shelter, longer-term transitional ones, and permanent housing with supportive services. Nearly half (47.6%) of the available units are categorized as transitional, the majority of which are reserved for families with children.

Facility Type	# of Facilities	Family Units	Family Beds	Individual Beds	Chronic Homeless	Total Beds
Emergency Shelter	20	42	141	222	0	363
Transitional Housing	24	150	486	106	0	592
Permanent Supportive Housing	16	39	98	190	48	288
Total	60	231	725	518	48	1,243

Source: 2009 Continuum of Care

The Housing Inventory Chart of the Allentown/Northeast PA CoC’s Unmet Needs is provided below. Although there are currently over 1,200 year-round beds available for the homeless in the region, there is still not enough housing to meet needs. Based on this table, an additional 135 permanent supportive housing beds are needed to meet the needs of the homeless population in Allentown and the surrounding region. For homeless individuals, 55 beds of permanent supportive housing are needed; for homeless families, the need includes 80 permanent supportive housing beds and 32 permanent supportive housing units. Allentown recognizes the magnitude of the need for additional homeless facilities and will continue to support the efforts of the CoC.

Allentown/Northeast PA Continuum of Care Unmet Homeless Needs, 2009				
	All Year-Round Beds/Units			
	Beds for HHs w/ Children	Units for HHs w/ Children	Beds for HHs w/o Children	Total Year-Round Beds
Emergency Shelter				
	0	0	0	0
Transitional Housing				
	0	0	0	0
Safe Haven				
	0	0	0	0
Permanent Supportive Housing				
	80	32	55	135
TOTALS	80	32	55	135

Source: 2009 Continuum of Care

Persons Threatened with Homelessness

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, one stint of mental or physical illness, 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 child care.

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 HIV/AIDS, disabilities, drug and/or alcohol additions
- Single parent households who are unemployed
- Large low income families
- Renters facing eviction
- Homeowners facing foreclosure

In 2009, the City of Allentown was awarded over \$1.1 million in federal HUD Homeless Prevention and Rapid Re-housing (HPRP) funding to strengthen rental assistance services and homelessness prevention programming. This effort will prevent hundreds of families from losing their homes and assist in re-housing approximately 65 currently homeless families over the next three years. Additional plans include the provision of case management assistance, enhanced services, and increasing the scope and level of housing subsidies available as a means to help with the transition from funded housing into self-sufficiency.

The Allentown Commission to End Chronic Homelessness participated in the application for and allocation of the HPRP funds. The Allentown/Northeast PA RHAB reviewed these recommendations. An HPRP Collaborative was created among the local Continuum of Care participants including the cities of Allentown, Bethlehem, and Easton, and Lehigh and Northampton Counties. The Pennsylvania Homeless Steering Committee ensures HPRP-funded projects were consistent with local Ten Year Homeless Plans, and supports the work of the Continuum of Care in its efforts to expand service delivery, performance accountability, and homelessness data collection. The CoC has pledged to work through the HPRP Collaborative and support the creation of 80 permanent housing beds for families over the next ten years. In addition to the City of Allentown's award, four additional HPRP awards – totaling \$1.6 million – went to eight counties within the CoC region from the PA DCED's allocation. This included a \$235,000 grant to Lehigh County; portions of this grant will be utilized within the City of Allentown as well. RHAB reviewed each project to determine its consistency with the Consolidated Plans within the region.

Priority Homeless Needs

1. Using the results of the Continuum of Care planning process, identify the jurisdiction's homeless and homeless prevention priorities specified in Table 1A, the Homeless and Special Needs Populations Chart. The description of the jurisdiction's choice of priority needs and allocation priorities must be based on reliable data meeting HUD standards and should reflect the required consultation with homeless assistance providers, homeless persons, and other concerned citizens regarding the needs of homeless families with children and individuals. The jurisdiction must provide an analysis of how the needs of each category of residents provided the basis for determining the relative priority of each priority homeless need category. A separate brief narrative should be directed to addressing gaps in services and housing for the sheltered and unsheltered chronic homeless.
2. A community should give a high priority to chronically homeless persons, where the jurisdiction identifies sheltered and unsheltered chronic homeless persons in its Homeless Needs Table - Homeless Populations and Subpopulations.

Note: The required Homeless Needs Table (formerly HUD Table 1A) is included in Additional Information – Appendix A.

1. Homeless and Homeless Prevention Priorities

One barrier to ending homelessness can be a need for food, clothing, and other basic necessities. A lack of understanding how to access the public homeless system and how to qualify for certain available services are also common barriers. Many of the homeless and near-homeless attempt to find affordable housing with little success due to bad credit and other obstacles such as weak employment skills and work history that make it difficult to be hired for any job other than entry-level minimum wage. Public transportation can also be limited making a car, and the expense of insurance and maintenance, a necessity. Another obstacle to stability may include affordable, safe childcare.

Local public and private nonprofit organizations throughout the City of Allentown, the Lehigh Valley, and the Northeast PA region have long provided a wide range of services to address these types of problems. These services include mental health services, drug and alcohol addiction counseling, home management and budget skill training, and employment services. A listing of local providers of services to the homeless and near homeless includes:

Homeless Service Providers	
Alcoholics Anonymous	Lehigh Valley Center for Independent Living
Alert Partnership	Lehigh Valley Drug & Alcohol Intake
Allentown City and Lehigh County Housing Authorities	Lehigh Valley Hospital Seventeenth and Chew Mental Health Clinic
Allentown Rescue Mission	Linkage Street Ministry
Catholic Charities	New Bethany Ministries
Children's Coalition of the Lehigh Valley	Older Adult Behavioral Mental Center (OABMC)
Clubhouse of Lehigh County	Our Lady of Mt. Carmel/St. Pauls Soup Kitchens
Community Action Committee of the Lehigh Valley	Pathways
Community Services for Children	Salvation Army
Crisis Intervention Center	Step by Step
Good Shepherd Workservice	The Program for Women and Families
Halfway Home of the Lehigh Valley	Transitional Living Center of Lehigh Valley Hospital
Haven House	Turning Point
Hispanic American Organization;	Valley Housing Development Corporation
Keenan House Treatment Trends	Valley Youth House
Lehigh County Conference of Churches	Victory House of Lehigh Valley
Lehigh County Mental Health/MR/D&A	

Among the many local agencies that provide prevention services, the Lehigh County Conference of Churches focuses on hunger, homeless, at-risk youth, and mental health issues. It also provides bus tickets to people who require assistance with transportation to and from work. A major area of concern in these efforts is the fact that those with criminal records cannot be placed at the area's largest employers, i.e. nursing homes and hospitals, due to availability of drugs. It is not unusual for the chronically unemployed to have a criminal record of some sort.

The Lehigh County Conference of Churches operates the Pathways Program, which receives ESG funds. Pathways is a place where people turn when facing emergency situations and are unable to provide their families with food, clothing, or shelter. The program helps with rental assistance, clothing, money management, toiletries, diapers, and bus passes. In an average year, Pathways serves 10,000 community members, utilizing 800 volunteers.

Another homeless provider is Valley Youth House, whose major focus is residential programs for homeless at-risk youths. This provider had to turn away 200 youth in 2009 as their 50 beds were filled to capacity. They have noted a marked increase in the level of mental health and psychiatric issues among youth for which they are seeking additional funding opportunities.

The Allentown Commission to End Chronic Homelessness has recently created the Emergency Services Directory as a tool to assist homeless in accessing the supportive services system in the area. This "street sheet" - a two-page guide to agencies and services for chronically homeless persons in the Allentown area - was created in June of 2008 as a result of the local planning process. It includes locations, contact info, services offered, and maps for distribution to homeless persons on the street. It is being downloaded from the City's website for disbursement by first responders, medical personnel, social service agencies, clergy, church groups, and other persons interested in assisting the chronically homeless in moving past homelessness and into safe, stable living conditions. Thirty-seven local providers of food, shelter, and supportive services are represented in this directory.

Priority Homeless Strategies

The City of Allentown recognizes that there is a pressing need for shelter space to accommodate the homeless. The **Allentown Plan To End Chronic Homelessness**

by 2017 has listed a three-part strategy for ending chronic homelessness in Allentown by 2017:

- **Prevention** strategies address the root causes of chronic homelessness through the provision of eviction prevention services, tenant education, rental assistance, job/vocational training, employment services, intensive case management services, and specialized services designed to address the unique needs of women and children who are homeless.
- **Intervention** strategies include the closure of all homeless camps and addressing the gaps and barriers in the service delivery system by identifying the chronically homeless persons to obtain and remain in permanent housing.
- **Infrastructure** strategies 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 in the community.

In addition to the three-part strategy described above, there are several other methods of addressing gaps in housing and services for the chronically homeless. These include:

- **Data Collection Process** – involves the creation of a database, the collection of data, and the development of annual data reports that will document the progress towards the goal of ending chronic homelessness.
- **Planning Process Evaluation** – will aid the implementation of the Commission’s plan by serving as a feedback loop and a measuring tool for the completion of action steps and interventions.
- **Phase II** – this portion of the **Allentown Plan To End Chronic Homelessness by 2017** outlines the strategy for implementation of the ten-year Plan through the creation of an Allentown Commission on Chronic Homelessness supported by Implementation Working Teams.

2. Chronic Homelessness

In recent years, the U.S. Congress has encouraged the development of permanent supportive housing for homeless people, especially for the chronically homeless population, a substantial number of whom are mentally ill. Concurrently, there has been a shift towards committing a greater proportion of federal funds toward “housing first” which demands less from the individual to remain in the housing.

HUD defines the term “chronically homeless” as an unaccompanied individual with disabilities who has been continually homeless for 12 months or more or who has had four episodes of homelessness in a three-year period. 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 and the lack of intensive support services due to lack of funding are being addressed by the Allentown/Northeast PA CoC process. Funding emphasis is now on additional permanent housing units. The need for a central recovery drop-in center for

unsheltered homeless is also being addressed, as is the decentralized system of overnight shelters in the winter that have helped bring in additional people off the streets. In addition, there are nonprofit-led homeless outreach teams that work with local police departments to identify and shelter the street homeless. The Veterans Administration, an active member of the CoC, also has mobile workers who conduct outreach in shelters and on the streets.

The Lehigh County Conference of Churches' 2005 study, cited above, focused on the chronically homeless in Allentown. The chronically homeless interviewed were found to be predominately white, male, divorced or never married, and had either a substance use disorder or mental illness. The majority of men in this population reported some sort of legal involvement and frequently reported histories of child abuse. Smaller numbers of the chronically homeless were women who also had a mental illness, substance use disorder, or both. The women had histories of victimization through domestic abuse, sexual assault, or childhood abuse.

It was found that the chronically homeless individuals infrequently used public shelters and other transitional housing programs, viewing them as uncaring, rigid, and non-beneficial. Common themes and experiences identified by the interviewees included, among others:

- childhood abuse and neglect;
- frequent relocation;
- parental substance abuse;
- placement outside the home;
- substance abuse;
- criminal activity;
- military experience;
- difficulty navigating the system;
- avoidance of shelters; and
- barriers to housing.

The **Allentown Plan To End Chronic Homelessness by 2017** cites the following facts about the chronic homeless in and around the City of Allentown.

- In 2005, 189 chronically homeless persons were identified over a two-year period in Allentown.
- As of January 2007, a total of 48 persons were living in nine homeless encampments in the City under bridges and wooded, out of the way places. Many were located on private property, and "permanent" structures had been built on two sites.
- There was a lack of coordinated services in Allentown designed to address the multitude of needs for persons who are chronically homeless.

In Allentown, 57 people were identified as chronically homeless in 2009. Of those 57 individuals, 25 were receiving shelter services within the Allentown system, but the majority of the chronically homeless (32) were unsheltered. The 2009 Point-in-Time Survey categorized the people interviewed into subpopulations as follows:

	Sheltered	Unsheltered	Total	% of Pop.*
Chronically Homeless	25	32	57	17.6%
Severely Mentally Ill	39	9	48	14.9%
Chronic Substance Abuse	73	14	87	26.9%
Veterans	29	3	32	9.9%
Persons with HIV/AIDS	0	0	0	0.0%
Victims of Domestic Violence	95	0	95	29.4%
Unaccompanied Youth Under 18 y	4	0	4	1.2%
Total	265	58	323	

* Percentage may not add up to 100%, as individuals may check more than one condition

Source: 2009 Continuum of Care

As the chart illustrates, the chronically homeless accounted for more than one-sixth of those interviewed.

Homeless Inventory (91.210 (c))

The jurisdiction shall provide a concise summary of the existing facilities and services (including a brief inventory) that assist homeless persons and families with children and subpopulations identified in Table 1A. These include outreach and assessment, emergency shelters and services, transitional housing, permanent supportive housing, access to permanent housing, and activities to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless. The jurisdiction can use the optional Continuum of Care Housing Activity Chart and Service Activity Chart to meet this requirement.

Inventory of Existing Facilities

The 2009 Housing Inventory Chart of Allentown/Northeast PA RHAB region is seen below. It provides data on the number of beds located in the region ready to meet the needs of homeless persons and families. There are 60 homeless-related facilities, with a total of 1,252 beds, in the region, including temporary shelter, longer-term transitional ones, and permanent housing with supportive services. More than two-thirds of the available beds (40.8%) are categorized as transitional, most of which are reserved for families with children (77.5%).

Facility Type	# of Facilities	Family Units	Family Beds	Individual Beds	Chronic Homeless	Total Beds
Emergency Shelter	21	61	231	222	0	453
Transitional Housing	23	131	396	115	0	511
Permanent Supportive Housing	16	39	98	190	48	288
Total	60	231	725	527	48	1,252

Source: 2009 Continuum of Care

The 2009 Continuum of Care Exhibit 1 Homeless Inventories for the Allentown/Northeast PA RHAB is included in Appendix B. Eighteen of these facilities - three emergency shelters, ten transitional housing developments, and five permanent supportive housing facilities - offering 513 year-round beds (41.0% of total), are located within Allentown. The homeless population can seek housing access in either short-term emergency shelters, longer-term transitional housing

facilities, or in permanent housing units that also provide needed services. The facilities located within Allentown are described below.

Emergency Shelters

The inventory of shelters in the Northeast PA region, which includes the City of Allentown, can be seen in the table below. It was taken from the 2009 Continuum of Care planning process material submitted to HUD.

There are 183 emergency shelter beds within the three facilities in the City of Allentown which is 40.4% of the total in the Northeast PA region. A slight majority of these beds in the City are for the use of households with children.

The Allentown Rescue Mission and the Salvation Army have shelters in the City containing 45 and 48 beds, respectively. It was noted in a recent interview with the Salvation Army that a substantial increase in clients are coming from areas outside of Allentown. A majority of clients have mental health problems; they noted that a growing population segment is 18-20 year old women, who are pregnant and have mental health problems.

The Sixth Street Shelter is primarily a short-term, 60-day short-term transitional shelter located in center city Allentown. It also operates an expanded care system, with 19 apartment units that may extend a client’s stay from 18-24 months. An individual/family pays 30% of its income as rent using Housing Choice Vouchers provided through Allentown Housing Authority. Tenants must have an adult working towards education through an approved program over a two-year period. Services offered include an after-school clinic, physicals for jobs/driver licenses, and Pre-GED classes.

Emergency Shelters in Allentown and Northeast PA Service Areas

Organization Name	Program Name	Population Served	HUD Funded?	Units for HH w/ Children	Beds for HH w/ Children	Individual Beds	Total Beds
CITY OF ALLENTOWN							
Salvation Army	Hospitality House-ES	SMF+HC	YES	8	41	4	45
Allentown Rescue Mission	Allentown Rescue Mission	SMF	YES	0	0	48	48
Community Action Commission	6th Street Shelter	HC	NO	19	90	0	90
TOTAL				27	131	52	183
NORTHEAST REGION OF PA							
Endless Mountain Mission Center	Endless Mountain Mission Center	SMF/HC	NO	3	8	9	17
Futures Community Support/Bradford Co	HAP ES Vouchers Program	SMF/HC	NO	0	0	0	0
Haven of Tioga County	Haven of Tioga County	SMF/HC/DV	NO	0	0	8	8
Safe Haven of Pike County	Safe Haven of Pike County	SMF/HC/DV	NO	2	6	0	6
East Stroudsburg Salvation Army	East Stroudsburg Salvation Army	SMF/HC	YES	3	11	20	31
Schulykill Women in Crisis	Schulykill Women Shelter	SMF/HC/DV	YES	2	5	12	17
Suivors Resources, Inc	Suivors Resources, Inc	SMF/HCDV	NO	2	4	1	5
The Bridge	Emergency Shelter Vouchers	SMF/HC	NO	0	0	0	0
The Trehab Center	Wayne shelter	SMF/HC	NO	0	0	0	0
3rd St Alliance for Women & Children	3rd St Alliance Shelter	HCSMF	NO	3	6	2	8
3rd St Alliance for Women & Children	3rd St Alliance Shelter	SFHC	NO	3	8	4	12
Women’s Resources of Monroe Co. Inc	Monroe Shelter	SFHC/DV	NO	1	6	5	11
Bradford Co. Human Services	Mix Avenue-ES	SMF	NO	0	0	1	1
Community Action Com of Lehigh Valley	Easton Safe Harbor	SMF	YES	0	0	26	26
Victory House of Lehigh Valley	Victory House of Bethlehem	SM	YES	0	0	40	40
Turning Point of Lehigh Valley Inc	Shelter	SFHC/DV	NO	7	24	24	48
Turning Point of Lehigh Valley Inc	Lehigh shelter	SFHC/DV	NO	8	22	6	28
Valley Youth House Committee Inc	Valley Youth House-ES	YMF	NO	0	0	12	12
TOTAL				34	100	170	270
GRAND TOTAL				61	231	222	453

Source: 2009 Continuum of Care

The City of Allentown received approximately \$120,000 in Emergency Shelter Program grant funds in FY2009 to support the needs of shelters located within its jurisdiction. These funds were awarded to the Allentown Rescue Mission and the Salvation Army for physical maintenance and repairs, utility, rent, and insurance costs.

Transitional Housing

Within Allentown, there are ten transitional housing projects for the homeless, providing a total of 237 year round beds (46.4% of the total) in the Northeast PA region. One hundred and forty-nine (62.9%) of the City’s total transitional beds are specifically designated for households with children. Homeless transitioning out of short-term shelter can be assisted and housed simultaneously at these facilities.

Transitional Housing in Allentown and Northeast PA Service Areas

Organization Name	Program Name	Target Population	HUD Funded?	Family Units	Family Beds	Individual Beds	Total Beds
CITY OF ALLENTOWN							
Allentown Rescue Mission	Christian Living Transitional Program	SM	NO	0	0	22	22
Community Action Commission	Ferry St Apartments	HC	YES	10	26	0	26
Community Action Commission	Turner St Apartments	HC	NO	12	32	0	32
Salvation Army	Hospitality House	HC	YES	6	15	15	30
The Program for Women & Families	Transitional Residence Coc Initiative	SF/HC	YES	9	12	2	14
Valley Youth House Committee	Maternity Group Home	SF/HC	YES	3	6	0	6
Valley Youth House Committee	Supportive Housing for Families	HC	YES	14	61	0	61
Valley Youth House Committee	Transitional Housing Program	SMF/HC	YES	2	11	8	19
Valley Youth House Committee	Youth Moving Forward	SMF/HC	YES	5	10	11	21
Valley Youth House Committee	Supportive Housing for Youth	SMF	YES	0	0	6	6
TOTAL				61	173	64	237
NORTHEAST REGION OF PA							
Easton Area Nghhd Centers Inc	Roofover	HC	NO	6	17	0	17
3rd St Alliance for Women & Children	Third St Alliance	SFHC	NO	7	18	5	23
3rd St Alliance for Women & Children	3rd Street Alliance	SF/HC	NO	1	3	0	3
Bradford Co. Human Services	Mix Avenue	SMF	NO	0	0	6	6
New Bethany Ministries	Restoration House	HC	YES	10	27	0	27
New Bethany Ministries	Transitional Shelter	HC	NO	13	51	0	51
Pocono Area Transntional Hsg	120 Pike Avenue	HC	NO	7	19	0	19
Pocono Area Transntional Hsg	Henning House	HC	NO	5	12	0	12
Schuylkill Community Action	Bridge House	SMF/HC/DV	NO	3	8	0	8
Schuylkill Women in Crisis	Transitional Housing for victims	HC/DV	YES	8	32	0	32
Tioga Co. Dept of Human Services	St. James Complex	SMF/HC	NO	3	12	12	24
Turning Point of Lehigh Valley, Inc	Starting Point	SFHC/DV	NO	4	12	4	16
United Christian Ministries, Inc	Cowanesque by the Lake	HC	YES	3	12	24	36
TOTAL				70	223	51	274
GRAND TOTAL				131	396	115	511

Source: 2009 Continuum of Care

Also operated by the Community Action Committee of the Lehigh Valley are the Turner Street and the Ferry Street Apartments. These offer an intensive educational program for homeless families and their children. The program helps families achieve their educational goals and greater self-sufficiency

The Allentown Rescue Mission/Christian Living Transitional Program is a residential facility that provides 24-hour, professionally-directed treatment for drug and alcohol dependency. The program offers variable lengths of stay based on the individual client. The mission also offers job training and placement, and a variety of rental housing options.

Permanent Supportive Housing

In recent years, the U.S. Congress has encouraged the development of permanent housing for homeless people. Concurrently, there has been a shift toward committing a greater proportion of federal funds toward housing only, without the requirements of accepting supportive services, and an increase in attention toward the hardest-to-serve, chronically homeless population, a substantial number of whom are mentally ill.

The City of Allentown presently has within its municipal boundaries, 93 of the 288 total permanent housing beds (32.3%) where supportive services and housing are provided to the formerly homeless. Twenty-four of these units have been designated for those who were chronically homeless. The owners of these permanent units with the City include the Valley Housing Development Corporation and the Lehigh County Housing Authority.

Permanent Supportive Housing in Allentown and Northeast PA Service Areas

Organization Name	Program Name	Pop Served	HUD Funded?	Units for HH w/ children	Beds for HH w/ children	Beds w/o children	Chronic Homeless	Total Year-Round Beds
CITY OF ALLENTOWN								
Lehigh Co. Conference of Churches	TBRA for the Disabled & CH	SMF	YES	0	0	22	22	22
Lehigh County Housing Authority	S+C	SMF/HC	YES	0	0	21	0	21
Valley Housing Development Corporation	PH for Homeless Persons w/MH-II	SMF/HC	YES	1	3	18	2	21
Valley Housing Development Corporation	PH for Homeless Persons w/MH-III	SMF	YES	0	0	15	0	15
Valley Housing Development Corporation	PH for Homeless Persn w/MI-IV	HC	YES	2	5	9	0	14
Total				3	8	85	24	93
NORTHEAST REGION OF PA								
Fitzmaurice Community Services Inc	Pathfinders	SMF	YES	0	0	12	0	12
Fitzmaurice Community Services Inc	West Hills Apartments	SMF/HC	YES	2	3	5	0	8
Resources for Human Development Inc	Crossroads Supportive Hsg	SMF	YES	0	0	26	0	26
Resources for Human Development Inc	Crossroads Supportive Family Hsg	HC	YES	10	30	0	0	30
Resources for Human Development Inc	LVACT Housing Support Program	SMF	YES	0	0	20	16	20
United Christian Ministries-Tioga PA	Kenner Court + Garnet House	MF	YES	0	0	15	0	15
Futures Community Support Services	Eastside Sayre Affordable Hsg	SMF/HC	YES	4	5	1	0	6
Housing Authority of Monroe County	S+C	SMF/HC	YES	8	21	7	0	28
Housing Development Corp of NE	PH for Persons with Disabilities	SMFHC	YES	7	26	4	0	30
Northampton County Housing Authority	S+C	SMF/HC	YES	5	5	7	0	12
Catholic Social Services of Scranton*	PH for Homeless Persn w/ MI-IV	SMF	YES	0	0	8	8	8
Total				36	90	105	24	195
Grand Total				39	98	190	48	288
* Under construction								
Source: 2009 Continuum of Care								

Valley Housing Development Corporation (VHDC) and the Lehigh County Housing Authority own and/or manage the majority of these units. VHDC was created in 1982 by the Lehigh County Housing Authority with the mission of developing affordable housing throughout the Lehigh Valley region. The two organizations have a longstanding contractual relationship, common goals, and shared staff. VHDC is a full-service developer and manager of affordable rental housing. It has been active

in new construction and rehabilitation within the Valley, and have developed over 1,000 affordable housing units for lower income residents.

Prevention and Outreach Activities

There are many social service agencies in Allentown and throughout the Northeast PA RHAB 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 Rescue Mission;
- Community Action Committee of Lehigh Valley;
- Halfway Home of the Lehigh Valley;
- Haven House;
- Lehigh County Conference of Churches;
- Lehigh Valley Center for Independent Living;
- Transitional Living Center of Lehigh Valley Hospital; and
- Turning Point of the Lehigh Valley.

These organizations provide 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.

Homeless Strategic Plan (91.215 (c))

1. Homelessness— Describe the jurisdiction's strategy for developing a system to address homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section). The jurisdiction's strategy must consider the housing and supportive services needed in each stage of the process which includes preventing homelessness, outreach/assessment, emergency shelters and services, transitional housing, and helping homeless persons (especially any persons that are chronically homeless) make the transition to permanent housing and independent living. The jurisdiction must also describe its strategy for helping extremely low- and low-income individuals and families who are at imminent risk of becoming homeless.
2. Chronic homelessness—Describe the jurisdiction's strategy for eliminating chronic homelessness by 2012. This should include the strategy for helping homeless persons make the transition to permanent housing and independent living. This strategy should, to the maximum extent feasible, be coordinated with the strategy presented Exhibit 1 of the Continuum of Care (CoC) application and any other strategy or plan to eliminate chronic homelessness. Also describe, in a narrative, relationships and efforts to coordinate the Conplan, CoC, and any other strategy or plan to address chronic homelessness.
3. Homelessness Prevention—Describe the jurisdiction's strategy to help prevent homelessness for individuals and families with children who are at imminent risk of becoming homeless.
4. Institutional Structure—Briefly describe the institutional structure, including private industry, non-profit organizations, and public institutions, through which the jurisdiction will carry out its homelessness strategy.
5. Discharge Coordination Policy—Every jurisdiction receiving McKinney-Vento Homeless Assistance Act Emergency Shelter Grant (ESG), Supportive Housing, Shelter Plus Care, or Section 8 SRO Program funds must develop and implement a Discharge Coordination Policy, to the maximum extent practicable. Such a policy should include "policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons." The jurisdiction should describe its planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how the community will move toward such a policy.

1. Homelessness

The **Allentown Plan to End Chronic Homelessness by 2017** has developed the following vision statement:

"We envision a city where there are no chronically homeless individuals or families."

The Plan's mission statement is as follows:

“By 2017, every formerly chronically homeless person will have the support services, health care, and employment opportunities needed to live as independently as possible in safe, sanitary, accessible, and affordable permanent housing of his or her choice.”

A primary obstacle in meeting the needs of homeless is limited affordable housing units.

Allentown City is also a participant in the Allentown/Northeast PA Continuum of Care in its efforts to address homelessness and the priority needs of homeless individuals and families, including subpopulations. The CoC addresses the housing and supportive service needs in each stage of the process to help homeless persons make the transition to permanent housing and independent living. Allentown will continue to support the CoC strategy to meet the needs of homeless persons and those at risk of becoming homeless.

Common goals found across the Northeast PA RHAB region include the following:

- Provision of Supportive Services and Service-Enriched Housing;
- Use a Continuum of Care to Address the Economic, Social, and Health Problems of the Homeless;
- Improve Rental Housing Opportunities; and
- Implement Agenda for Ending Homelessness in PA.

Exhibit 1 of the CoC for Allentown/Northeast PA Regional CoC can be seen in Appendix B. In addressing HUD’s five strategic planning objectives, RHAB has formally pledged to work toward the end of chronic homelessness as well.

2. Chronic Homeless Strategy

The City of Allentown is a lead participant in the Commission to End Chronic Homelessness. It will support all actions identified in this plan to implement this strategy. In addition, the Allentown/Northeast RHAB’s CoC Ten Year Plan lists the following 2009 Local Action Steps to attain HUD’s National Objective of ending chronic homelessness and moving families and individuals into permanent housing.

Objective 1: Create new public housing beds for chronically homeless persons

In October 2008, Catholic Social Services of the Diocese of Scranton, Inc., began operations of an 8-unit permanent supportive housing program for chronically homeless individuals. The first unit was occupied in April 2009. In the next twelve months, the CoC will ensure occupancy of these beds. Through its Hope VI revitalization of public housing, Lehigh County created 20 one-bedroom, low income housing units targeted to the disabled and chronically homeless; these units will be available for occupancy in the next twelve months.

The Lehigh County Department of Human Services Comprehensive Housing Plan prescribes \$7.1 million in Reinvestment Funds for comprehensive housing and services for individuals experiencing mental health/substance abuse problems and who are at high risk for chronic homelessness. The money, which is targeted to housing persons with disabilities, comes from savings in behavioral health managed care over the first several years of the PA HealthChoices initiative. Over the next

five years, the CoC will remain supportive of Lehigh County's efforts to implement the County Comprehensive Housing Plan and HealthChoices Reinvestment Plan for its four priority populations, including persons who may be chronically homeless. Over the next ten years, the CoC will develop a total of 60 new permanent housing beds for the chronically homeless.

Objective 2: Increase percentage of homeless persons staying in permanent housing over 6 months to at least 77.0%

Over the next twelve months, the CoC will maintain the percentage of homeless persons remaining in permanent housing for at least six months at 83 percent. In the next 12-months, the CoC will ensure high quality supportive services are delivered to 221 persons residing in permanent housing through project performance monitoring and HMIS reports.

In the next 12 months, the Community Action Committee of the Lehigh Valley (CACLV) will provide annual rental education programs and support the Renter Protection Program by creating recourse to address sub-standard housing, code violations, and tenant/landlord conflicts. CACLV will begin providing rental assistance funds to 500 households annually across the CoC.

Following the Lehigh County Dept. of Human Services Comprehensive Housing Plan, over five years and through a \$7.1 million investment in housing and wraparound supportive services, the following subpopulations will be stabilized in permanent supportive housing:

- Persons with serious and persistent mental illness currently in Community Rehabilitation Residences, whose housing and service needs can be more appropriately met in permanent supportive housing;
- Young adults (age 18-23) who suffer from serious or persistent mental illness and are in need of permanent supportive housing;
- Forensic population who are transitioning out of Lehigh County Prison; and
- Persons suffering from mental illness who are homeless or at risk of homelessness.

The CoC will remain an active partner over the duration of this ambitious multimillion dollar housing and services project.

Objective 3: Increase the percentage of homeless persons moving from transitional to permanent housing to at least 65.0%

In 2008 and 2009, 80% of homeless persons moved from transitional to permanent housing. This percentage will be maintained in the next 12 months through the use of HPRP funding. Homelessness Prevention and Rapid Re-Housing (HPRP) funding will provide case management assistance, enhance services, and expand the scope and level of housing subsidy available to persons and families as a means to transition from funded housing into self-sufficiency at the following levels:

1. Allentown: \$1,129,049
2. Northampton County: \$414,671
3. Carbon County: \$342,179
4. Lehigh County: \$237,055
5. Pike County: \$180,971

6. Tioga County:	\$178,520
7. Susquehanna County:	\$176,486
8. Wyoming County:	\$45,442
9. Sullivan County:	\$28,513

The CoC's long-term plan to increase the percentage of homeless persons moving from transitional to permanent housing over ten years involves creating housing for homeless persons. This is accomplished by leveraging local financial commitments, as well as State sources. Over ten years, the number of permanent housing units that will indirectly be created, due to non-HPRP clients receiving financial assistance, is estimated at 103 units. Across the CoC, non-HPRP funded activities will continue to include: motel/hotel stays, shelter, utility assistance, rental/security deposits, case management, and foster care placement in the most extreme circumstances.

Objective 4: Increase the percentage of homeless persons employed at exit to at least 20%

The CoC achieved 35% of persons employed at exit. The CoC will maintain this percentage of persons employed at exit in the next 12 months. Over the next 12 months, the CoC will continue to support employment and life skills training programs, such as the Allentown Rescue Mission Workforce Development Program, the Clean Team. The Clean Team is an innovative training project, employing 22 individuals who are working their way out of homelessness and teaching them transferable workplace skills. Clean Team worker trainees pick up litter on the streets of Allentown. The CoC further recognizes that many disabled individuals cannot work and supports initiatives such as the Challenge 150; located in Allentown, Challenge 150 is a community effort to create 150 betterment efforts conducted by homeless adults assisting in activities such as human service organizations "days of caring", graffiti eradication, dumpsite clean-up, care for damaged cemeteries, and other projects.

The CoC will increase the percentage of homeless persons employed at program exit by two percent in five years and by five percent in ten years, reaching 40% employed at exit in ten years. Over ten years, the CoC will develop or expand 10 Housing Specialist Positions in the 10 rural counties affected by industry closure and layoffs, which have increased the region's unemployment rate. The Housing Specialist, in the case management role, will serve as the central figure in each rural community assisting people to transition into services. The priority services will include employment training, life skills training, and physical and emotional rehabilitation. The Housing Specialist positions will yield a higher-skilled work force prepared to re-enter the job market once the economy is stabilized.

Objective 5: Decreasing the number of homeless households with children

In 2008 and 2009, the CoC expanded transitional housing beds for homeless families by 28 beds, effectively increasing the number of homeless families served. Due to this program expansion, nearly 45% more families were identified during the 2009 Point-in-Time survey. This does not mean there was an increase in the total number of families who are homeless, but rather an increase in the number served. The CoC certified five HPRP projects in nine counties and will begin its efforts to rapidly re-house 22 families in the next 12 months and transition these families to permanent housing over the next 18 months.

In response to the 2009 economic stimulus package passed through Congress, the Allentown/Northeast Pennsylvania RHAB created the HPRP Collaborative among the local Continuum of Care for homelessness, State and Federal CDBG-entitlement communities, and the Pennsylvania Homeless Steering Committee. Its function is to ensure those projects funded through the Recovery Act are consistent with the local Ten Year Plan and extend the efforts of the Continuum of Care through expanded services delivery, performance accountability, and homelessness data collection. The CoC will work through the HPRP Collaborative and support the creation of 80 permanent housing beds for families over the next ten years.

3. Homelessness Prevention

There are many social service agencies in Allentown and throughout the Northeast PA RHAB 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;
- Halfway Home of the Lehigh Valley;
- Haven House;
- Lehigh County Conference of Churches;
- Lehigh Valley Center for Independent Living;
- Transitional Living Center of Lehigh Valley Hospital; 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.

4. Institutional Structure

Homelessness 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 surveys, 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 Northeast Regional Homeless Advisory Board (RHAB). This regional organization, made up of representatives of 75 public and private groups, was formed to assist in reviewing public policy, programs, activities, data, and all other efforts that will eliminate homelessness and improve the well-being of homeless persons and families in the region. The RHAB serves on the primary

decision-making group with administrative assistance from the Valley Development Corporation. RHAB members, including the City of Allentown, meet on quarterly basis to address the issues of homelessness in the state.

5. Discharge Policy

Foster Care Discharge Policy

The Prevention Subcommittee of the Allentown/Northeast PA Continuum of Care Steering Committee (which includes a representative from the CoC) is assisting DCED in the development of a universal discharge tool to be used for youth exiting foster care. The committee expects to have the protocol in place in 2011. It will include information such as where the youth anticipates living following discharge, the cost of housing, and the source of income, as well as two contingency plans. The planning tool will also verify that youth have legal documentation in order to obtain housing (a birth certificate, social security card, and state ID). Currently, one member of the CoC provides case management and independent living services (funded through the Chafee Act) for foster care youth within the CoC to prepare them for a successful transition from care.

Health Care Discharge

Hospitals in Pennsylvania must have written discharge policies for appropriate referral and transfer plans that comply with Pennsylvania Code (028 Section 105). Further, the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) requirements prohibit the release of individuals without a discharge plan that includes having a place to live. To provide further assistance in finding appropriate accommodations for persons with disabilities, the Commonwealth's Ten Year Plan to End Homelessness calls for increased use of SOAR (SSI/SSDI Outreach, Access, and Recovery Program). SOAR allows users to explore various accommodation options for people with disabilities. The system is currently in use in Lehigh and Allegheny Counties, and Philadelphia.

Mental Health Discharge

The Commonwealth of Pennsylvania has a formal policy that no discharge from a state hospital can occur unless all housing, treatment, case management, and rehabilitation services are in place at the county level. The Pennsylvania Department of Public Welfare/Office of Mental Health and Substance Abuse Services (OMHSAS) sets this policy. In 2006, the Housing Work Group of the Adult Advisory Committee of the OMHSAS unveiled the *Plan for Promoting Housing and Recovery-Oriented Services*. The Housing Work Group offered the following philosophy:

“Stable housing is an essential component of mental health recovery. People with serious mental illness and co-occurring disorders must have access to a comprehensive array of permanent, affordable, barrier free housing options as well as the supports necessary for them to obtain and maintain the housing of their choice.”

Correctional Institution Discharge

The Commonwealth of Pennsylvania has a formal policy that no individual may be discharged from a State Correctional Institution without an approved Home Plan. It requires the continuity of care planners in each institution make every effort to assure a viable home plan and follow-up services for all who will be released. In order to expedite re-entry, the PA Department of Corrections (DOC) issued a policy statement on Inmate Reentry and Transition on January 5, 2006. This policy includes providing each inmate being released from a State Correctional Institution with written information on housing, a photo ID, and other personal documents. Regional efforts which bring life to the guiding vision and policy of the Dept. of Corrections include:

SPORE (Special Program for Offenders in Rehabilitation and Education): Identifies persons with a serious mental illness involved in the criminal justice system; provides advocacy, accountability, and assistance thereby leading the person to a greater degree of health, responsibility, proficiency, and quality of life.

MISA (Mental Illness/Substance Abuse): Inmates of Lehigh County Prison with an identified psychiatric disorder are assessed for secondary drug and/or alcohol abuse issues as part of their initial evaluation. Treatment services are provided and wrap around to community-based providers. Recovery tools are provided that may help inmates learn to stay clean and sober and housed upon discharge.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Since the City is a direct ESG Entitlement, this section is NOT APPLICABLE.

COMMUNITY DEVELOPMENT

Community Development (91.215 (e))

*Please also refer to the Community Development Table in the Needs.xls workbook

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), – i.e., public facilities, public improvements, public services and economic development.
2. Describe the basis for assigning the priority given to each category of priority needs.
3. Identify any obstacles to meeting underserved needs.
4. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

NOTE: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Note: The required Community Development Table (formerly HUD Table 2B) is included in Additional Information – Appendix B.

1. Priority Non-Housing Community Development Needs

The City of Allentown's non-housing community development needs reflect the City's goals of enhancing the economic environment, upgrading the public infrastructure and public facilities, and supporting public service efforts. CDBG resources will be directed towards efforts in neighborhoods in the Focus Area that will enhance economic development, streetscapes, and recreational infrastructure and programming.

The following are the overall goals by category:

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. In addition, the City will strive to:

- Increase employment opportunities in the City, with special attention to strengthening the commercial/industrial base in the Focus Area;
- Assist in the revitalization of the central business district;
- Facilitate the adaptation and reuse of existing vacant and under-utilized land and buildings located within the Focus Area;

- Increase the educational preparedness and level of skills necessary for entrance employment opportunities for residents of the Focus Area;
- Strengthen Focus Area retail and service areas;
- Facilitate Focus Area residents' ability to access jobs by removing impediments; and
- Enhance transportation and utility infrastructure to better serve existing business and attract new types of businesses and industries.

Infrastructure Goals: A primary goal for the City is the improvement of transportation and utility infrastructure, particularly in the Focus Area, to attract new business and industry, and improve the quality of life for residents. Objectives include the following:

- Pursue infrastructure improvements that will promote commercial/industrial development within the Focus Area;
- Pursue infrastructure improvements in residential neighborhoods that improves the overall environment of the neighborhood and encourages multi-modal transportation options; and
- Ensure that industrial properties slated for redevelopment/rehabilitation into other uses have the necessary utilities to support these potential uses.

Community Recreational/Educational Programming & Facilities Goals: The primary goal for the City is to improve the availability and accessibility of schools, churches, parks, recreational and educational programs and facilities, and community centers for use as neighborhood resources and places for people to gather and recreate. Objectives include the following:

- Enhance utilization of existing public/quasi-public facilities for neighborhood activities;
- Properly maintain and improve the condition of publicly-owned facilities; and
- Increase the number of, and access to, recreational and educational program opportunities for residents of the Focus Area.

Livability Goals: The goals for enhancing livability in the City include preserving and improving the quality of life in Allentown's neighborhoods, and promoting civic and neighborhood pride, as well as respect for one's neighbors. Objectives include the following:

- Increase cleanliness in the City neighborhoods;
- Increase the percentage of homeownership in the Focus and Rehabilitation Areas;
- Decrease the housing density within the Focus Area;
- Support existing neighborhood groups and promote the development of new community organizations throughout the City;
- Increase the supply of parking in Focus and Rehabilitation Areas;
- Promote the architectural and cultural resources that exist in many City neighborhoods; and
- Enhance the appearance of Allentown's neighborhoods through proper design of public spaces.

Public Safety Goals: The primary goal of the City will continue to be ensuring a

safe and secure environment in which residents can live, work, and play, particularly in the Focus Area. Another goal is to reduce the crime and potential for crime, particularly in the Focus Area. Objectives include the following:

- Create safe and secure residential neighborhoods and commercial districts;
- Enforce existing safety codes for areas in public rights-of-way and in residential neighborhoods; and

2. Basis for Assigning Priorities

Community development priorities were developed by:

- Weighing the severity of the need among all groups and subgroups;
- Analyzing the current social, housing, and economic conditions;
- Analyzing the relative needs of LMI families;
- Assessing the resources likely to be available over the next five years; and
- Evaluating input from focus group sessions, interviews, service provider surveys, municipal departmental staff and public hearings.

3. Obstacles to Meeting Underserved Needs

The primary impediment to the City's ability to meet underserved needs in Allentown is the limited amount of CDBG funding available to address identified priorities.

Intensifying the impact of limited available funding is the current state of the economy in Allentown and in the Northeast Pennsylvania region. Although there are some early signs of economic growth, the recent decline in the commercial and residential market has slowed the growth that the City was experiencing during the middle of the decade.

The City of Allentown has used its HUD entitlement funds to diligently achieve, and in many instances surpass, its goals. The City has continuously sought public and private resources to leverage its entitlement funds in assisting with implementation of policies and programs to create the vision.

4. Specific Short- and Long-Term Objectives

The City of Allentown has identified the following non-housing priority objectives and strategies over the next five years:

Economic Development & Job Creation

The City has been actively working to enhance its economic base and increase economic opportunities for its residents, via a number of economic development efforts. These efforts will be primarily concentrated on the Focus Area or on activities that are accessible to residents of the Focus Area.

Long-Term Goals: The City of Allentown will continue to facilitate developments in the community that create a more diverse and broad-based economy that adds jobs to the area and results in an upgrade of the environment. In particular, the City aims to support the local economy and small businesses through streetscape and façade improvements, small business loans, and job training programs.

Short-Term Objectives and Strategies:

1. *Increase employment opportunities in the City, with special attention to strengthening the commercial/industrial base in the Focus Area and making it accessible to residents in the Focus Area*
 - Assist existing firms within the Focus Area by following up on identified needs and initiating problem-solving activities
 - Encourage entrepreneurship of residents of the Focus Area by reducing the costs of suitable office space, obtaining financing, and providing technical assistance
 - Undertake infrastructure improvements that will promote commercial/industrial development within the Focus Area
 - Encourage small businesses located within the Focus Area to participate in existing loan programs, and create new loan programs to fill the gaps in available financing
 - Support employers' efforts to hire and train residents of the Focus Area
 - Provide direct loan assistance to for-profit businesses to retain existing jobs and create new jobs
 - Assemble sites in support of commercial and industrial development and expansion initiatives that result in the creation of jobs; pursue HUD Section 108 loan guarantees, as appropriate to stimulate private investment
 - Package employment incentives such as tax credits, on-the-job and customized job training to attract businesses to the Focus Area

2. *Assist in the revitalization of the central business district*
 - Support the assembly of sites for the on-going development of Class A multi-user office space and new corporate headquarters within the central business district
 - Support existing retail stores in the central business district that attract customers from throughout the region, and attract other specialty retailers
 - Recruit additional restaurants to the central business district and support the expansion of cultural and entertainment activities downtown
 - Encourage the utilization of currently-vacant upper floor space within the central business district
 - Encourage the restoration and rehabilitation of older store fronts within the central business district
 - Assure the provision of adequate parking within the central business district to support existing and proposed office development, retail shopping, cultural and entertainment activities, and residential development

3. *Facilitate the adaptation and re-use of existing vacant and under-utilized land and buildings within the Focus Area*
 - Inform owners of vacant and under-utilized properties located within the Focus Area of the available programs to redevelop/reuse these sites, as well as their current market potential
 - Provide financial and other inducements that promote the modernization of older industrial structures within the Focus Area

- Seek financial assistance for infrastructure development within the Focus Area when unique problems create extraordinary burdens in terms of cost of development
 - Facilitate the clearing of structures within the Focus Area to create development opportunities when the cost of modernization of the existing structures is not feasible
 - Initiate programs to overcome special burdens of environmental clean-up of otherwise suitable industrial sites within the Focus Area
 - Review City zoning, building, and fire protection ordinances to ensure they do not unduly restrict the use and design of older structures and their processes are executed in a timely and orderly manner
 - For larger industrial building modernization and expansion projects located in the Focus Area, work with neighborhood groups in the area to create forums for communicating improvement plans between the firms and the neighborhoods
 - Consider commercial, residential and institutional alternative uses which are neighborhood compatible for obsolete industrial structures within the Focus Area
4. *Increase the educational preparedness and level of skills necessary for entrance employment opportunities for residents of the Focus Area*
- Assess the skills needed by businesses located throughout the region
 - Assess the accessibility and availability of basic skills and vocational training opportunities for Focus Area residents
 - Assist basic skills providers and educational institutions in meeting the needs of Focus Area residents
 - Promote and coordinate community based organizations and State Employment Center programs that identify available human resources and match employment skills to employer requirements
5. *Strengthen Focus Area retail and service areas*
- Examine the services and space available within existing neighborhood business areas within the Focus Area
 - Work with neighborhood groups to identify the service needs of Focus Area residents
 - Recruit businesses for the neighborhood business areas within the Focus Area by providing financial, location and technical assistance
6. *Facilitate Focus Area residents' ability to access jobs by removing impediments*
- Work with LANTA in adjusting bus routes and hours of operation to improve the accessibility of area employment centers to Focus Area residents
 - Work with employers and dependent care providers to improve the accessibility and affordability of child care/elder care throughout the City
7. *Enhance transportation and utility infrastructure to better serve existing business and attract new types of businesses and industries*

- Improve transportation infrastructure in the City, particularly in the Focus Area, to attract new and diverse businesses and spur job creation
- Explore the potential for utility infrastructure upgrades, such as Wi-Fi hubs or fiber optic lines, to attract hi-tech businesses and industry to the central business district

Community Recreational/Educational Programming & Facilities

The City of Allentown has been working to link public facility improvements to the overall economic development efforts of the City. Efforts include improving and increasing the number of public green spaces and/or city parks within the neighborhoods surrounding the downtown and making physical improvements to the existing streetscapes.

Long-Term Goals: The City of Allentown will continue to improve community spaces in the city, including community centers, parks, and streetscape efforts to enhance the natural and built environment.

Short-Term Objectives and Strategies:

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

- Conduct an inventory of facilities suitable for neighborhood activities, starting in the Focus Area
- Discuss the availability of each facility with its owner
- Assess the service needs of each neighborhood that could be addressed through enhanced utilization of existing facilities, using the Parks and Recreation Master Plan and other plans as a starting point
- Work with community groups, facility owners and service providers to develop a schedule of activities for each neighborhood's facilities

2. Properly maintain and improve the condition of publicly-owned facilities

- Work with other government agencies to assess the condition of public facilities, starting in the Focus Area, and to prepare a cost estimate to renovate the facilities taking into consideration their expanded use
- Apply for federal, state, and private grants to partially fund the renovation of City-owned facilities
- Upgrade City-owned facilities through regular allocations from the Capital Budget
- Encourage other government entities to apply for federal, state and private grants to partially fund the renovations
- Encourage neighborhood groups to assist in maintenance and improvement efforts

3. Increase the number of and access to recreational/educational program opportunities within the Focus Area

- Examine the recreation/education needs of citizens living in the Focus Area
- Work with recreation/education service providers to offer desired services

- Support the provision of recreational/educational programs within the Focus Area, whenever possible
- Support the provision of convenient transportation to the desired activities when services cannot be provided within the Focus Area
- 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

Infrastructure

The City of Allentown has a number of infrastructure improvements planned that will assist in the revitalization of the community, particularly revitalization of the Focus Area.

Long-Term Goals: Ongoing infrastructure improvements to support the overall economic development and housing efforts will include streets, sidewalks, sewers, storm water, and any additional infrastructure needed to enhance Allentown's infrastructure in the Focus Area.

Short-Term Objectives and Strategies:

1. *Pursue infrastructure improvements that will promote commercial/industrial development within the Focus Area*
 - support the assembly of adjacent sites for the on-going development of office space and new corporate headquarters within the central business district, or industrial
 - require property owners to replace curb and sidewalk when they are in violation of the City Code, in areas where systematic code enforcement inspections are being conducted
2. *Pursue infrastructure improvements in residential neighborhoods that encourage multi-modal transportation options and offer residents the ability to choose*
 - work with LANTA in adjusting bus routes and hours of operation to improve the accessibility of area employment and entertainment centers to Focus Area residents
 - explore the feasibility of alternative transportation systems, such as sharrows (road lanes shared by cars and bikes) and separated bike networks
 - support the installation of signage for alternative transportation networks for residents and way-finding signage for tourists and visitors
3. *Ensure that industrial properties slated for redevelopment/rehabilitation into other uses have the necessary utilities to support these potential uses*
 - obtain financial assistance for infrastructure development within the Focus Area when unique problems create extraordinary burdens in terms of cost development
 - establish a land bank of vacant/under-utilized properties and create a priority list for improvement/development of these properties predicated upon their marketability

Livability

The City of Allentown will continue its efforts to preserve and improve the quality of life in its communities, while promoting civic and neighborhood pride.

Long-Term Goals: Encourage the revitalization of downtown Allentown, particularly the Focus Area, through increased homeownership opportunities, improvement of existing infrastructure, and increased engagement with neighborhood groups and residents.

Short-Term Objectives and Strategies:

1. *Increase cleanliness and a sense of well-being in the City's neighborhoods*
 - Locate trash cans in the public right-of-way in the Focus Area, wherever practical
 - Promote neighborhood clean-up efforts City-wide
 - Support programs that recognize individual or neighborhood efforts to maintain or improve appearance of neighborhoods
 - Develop programs to facilitate the revitalization of vacant, boarded, and/or deteriorated properties
2. *Increase the percentage of homeownership in the focus and rehabilitation areas*
 - Offer incentives to encourage potential homeowners to buy properties in the Focus Area
 - Develop new programs that encourage homeownership
 - Provide rehabilitation loans for code corrective work to homeowners residing in the Focus Area
3. *Decrease the housing density within the Focus Area*
 - Encourage the deconversion of multi-family structures in overcrowded Focus Area neighborhoods, especially where the original floor plans were single-family homes
 - Selectively demolish condemned and deteriorated properties in the Focus Area for which no feasible reuse may be found
4. *Support existing neighborhood groups and promote the development of new community organizations throughout the City*
 - Coordinate City services to complement the efforts of neighborhood groups and residents, especially in the Focus Area
 - Strengthen the relationships among neighborhood groups, community institutions, businesses, government, and residents, especially in the Focus Area
 - Work with interested community groups City-wide to develop neighborhood improvement plans
5. *Increase the supply of parking in the Focus and Rehabilitation Areas*
 - Create neighborhood parking lots throughout the Focus Area

- Work with LANTA in adjusting bus routes and hours of operation to better meet the needs of potential riders in the focus and rehabilitation areas, thereby reducing residents' dependence on automobiles
6. *Promote the architectural and cultural resources that exist in many City neighborhoods*
- Work with cultural organizations to develop additional programs aimed at encouraging people to take advantage of the City's many cultural resources, including theaters, museums, restaurants, and ethnic events
 - Work with community organizations to promote the benefits of preserving, reusing, and restoring the City's architecturally and historically significant buildings, sites, and neighborhoods
 - Offer incentives for restoration or historically sensitive rehabilitation and reuse of properties in the City's historic and architecturally significant areas
 - Offer grants for the difference between the amount required to meet the Secretary of the Interior Standards for Rehabilitation and that necessary for basic housing rehabilitation to households who qualify for housing rehabilitation loans residing in districts eligible for the National Register of Historic Places
7. *Enhance the appearance of Allentown's neighborhoods through proper design of public spaces*
- Plant trees and support other activities which improve the landscape and streetscape in previous and current systematic code enforcement inspection areas
 - Enhance the coordination of defined neighborhood objectives and infrastructure planning and design

Public Safety

The City of Allentown will continue to improve public safety for residents and visitors of Allentown through increased business activity and increased attention to existing public safety measures, particularly in the Focus Area. The City also plans to implement plans and objectives developed under the Weed & Seed Program, and work with neighborhood groups to reduce crime.

Long-Term Goals: Promote ongoing efforts to make downtown Allentown, particularly the Focus Area, more attractive and accessible to residents and visitors through crime reduction and prevention.

Short-Term Objectives and Strategies:

1. *Create safe and secure residential neighborhoods and commercial districts*
 - Encourage neighborhood policing by citizen groups and promote coordination between citizen groups and law enforcement
 - Support more non-office/non-institutional uses downtown as a way to encourage an active nightlife and after-hours activities that will have the ancillary effect of reducing crime

- Target crime reduction and prevention programs to downtown Allentown and the Central Business District to attract residents after-hours
 - Implement plans and objectives associated with the Allentown's Weed and Seed Program related to crime reduction
2. *Enforce existing safety codes for areas in public rights-of-way and in residential neighborhoods*
- Develop a coordinated approach to strengthen and strongly enforce the City's ordinances regarding litter, graffiti, loud music, and loitering
 - Require property owners to replace curbs and sidewalks when they are in violation of the City Code, in areas where systematic code enforcement inspections are being conducted
 - Enforce the disruptive conduct provision of the Rental Unit Inspection Program
 - Hold landlords accountable for tenant safety, and foster dialogue between the City, landlords, and tenants to identify areas for safety improvement

Antipoverty Strategy (91.215 (h))

1. Describe the jurisdiction's goals, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually). In consultation with other appropriate public and private agencies, (i.e. TANF agency) state how the jurisdiction's goals, programs, and policies for producing and preserving affordable housing set forth in the housing component of the consolidated plan will be coordinated with other programs and services for which the jurisdiction is responsible.
2. Identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the jurisdiction has control.

1. Goals, Programs and Policies for Reducing the Number of Poverty-Level Families

In 2000, 18.5% of Allentown residents lived in poverty; however, 11 of the 15 census tracts contained whole or partially within the Focus Area had poverty levels exceeding that of the City. The American Community Survey estimates that in 2008, 20.4% of Allentown residents were living in poverty, an increase of 3,471 individuals.

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. This philosophy is reflected throughout the Consolidated Plan and the programs that will be implemented by the City.

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 short-term transitional housing programs. 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 adults, the City funds a literacy program and English as a second language (ESL) classes. 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. However, it is possible 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.

2. Estimated Reduction in the Number of Poverty-Level Families

Poverty is a function of income. Factors that affect income include education, job training, and employment. The City of Allentown, by itself, has very little control over the factors that cause poverty. Such factors include unemployment, substance abuse issues, and lack of transportation options to get to and from work, to name a few.

While the City has little control over the overall factors that cause poverty, the City elects to support data-measured organizations that provide quality services to low income residents to help them improve their incomes. For example, the City of Allentown, in partnership with nonprofit organizations and businesses, can influence the chances for poverty-stricken residents of moving up and out of poverty. The City can achieve this by supporting organizations that offer job training and placement services as well as drug and alcohol abuse counseling services. In addition, the City can help to reduce the number of residents living in poverty by advocating for increased public transit options within the greater Lehigh Valley region to low income areas, including extended service hours on the evenings and weekends and the addition of new or alternate routes.

Ultimately, federal and state policies on welfare, health care, and the minimum wage

are crucial factors in the fight to address and reduce poverty. The City will continue to provide incentives for businesses to locate in low income areas, to advocate for improved transportation alternatives, to support organizations that provide job training and placement services, to support homeless prevention activities, and to preserve and improve affordable housing options, as part of its strategy to prevent and alleviate poverty in Allentown.

Low Income Housing Tax Credit (LIHTC) Coordination (91.315 (k))

1. (States only) Describe the strategy to coordinate the Low-income Housing Tax Credit (LIHTC) with the development of housing that is affordable to low- and moderate-income families.

NOT APPLICABLE.

NON-HOMELESS SPECIAL NEEDS

Specific Special Needs Objectives (91.215)

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

1. Priorities and Objectives

The priorities and objectives identified below are not presented in order of preference. They are grouped by type of activity and are based on information obtained from housing and social service providers.

Priorities for the Elderly/Frail Elderly Populations

- Continue to support activities that provide affordable housing for elderly and frail elderly residents at or below 80% of area median income.
- Continue to support activities that provide the elderly and frail elderly with benefits counseling, care coordination, transportation, and other services.

Through its funding of public service and public facility activities, the City will support the efforts of organizations that seek to develop affordable housing for the elderly and frail elderly, as well as those organizations that provide services to the elderly and frail elderly.

Priorities for Persons with Mental Illness

- Continue to offer support and assistance to local agencies that provide supportive services and outreach programs to individuals with mental illness.
- Increase the supply of transitional and permanent supportive housing facilities for persons with mental illness and mental disabilities, on a regional basis. These facilities should provide case management services to residents.

The City of Allentown will aid the efforts of area organizations that provide supportive services and housing options to persons with mental illness.

Priorities for Persons with Disabilities

- Provide tenant-based rental assistance subsidies to individuals and families who have disabilities and are in danger of becoming homeless.
- Provide financing to disabled individuals to rehabilitate housing units for accessibility.
- Continue to support activities that serve persons with disabilities.

The City will aid the efforts of area organizations that provide supportive services and housing options to disabled persons.

Priorities for Persons with Alcohol and Drug Addiction

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

The City of Allentown will offer assistance to local agencies providing outreach services to individuals with drug and alcohol problems. Furthermore, the City will maintain dialogue with area service providers and nonprofit organizations to evaluate the feasibility of developing additional transitional and supportive permanent housing, on a regional basis, for people with substance abuse issues.

Priorities for Persons with HIV/AIDS

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

Through various federal funding sources, the City of Allentown will support area organizations that provide supportive services and affordable housing options for people living with HIV/AIDS. This includes the Lehigh County Conference of Churches. The needs of these populations are discussed in more detail above.

2. Federal, State, and Local Sources Available to Address Special Needs and Priorities

It is increasingly difficult for the City of Allentown to fund non-homeless special needs projects, due to the limited amount of funding the City receives annually to support housing and community development initiatives, a growing homeless population, and the increasing amount of basic community needs resulting from current economic conditions. However, other resources are available on the federal, state, and local levels that area organizations can solicit to help provide affordable housing opportunities and supportive services to Allentown's non-homeless special needs populations.

There are several resources available to support non-homeless special needs housing initiatives. At the federal level, this includes HUD Section 202 housing funds (elderly projects), HUD Section 811 housing funds (housing for people with disabilities), Section 8 tenant and project based rental assistance, Hope VI funds, the Federal Home Loan Bank's Affordable Housing Program, Low Income Housing Tax Credits (LIHTC), Federal Home Loan Bank funds, public housing funds, HOPWA and ESG funds, and other resources.

The City will continue to support the efforts of local and regional organizations that provide housing and supportive services to non-homeless special needs individuals in Allentown.

Non-homeless Special Needs (91.205 (d) and 91.210 (d)) Analysis (including HOPWA)

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, victims of domestic violence, and any other categories the jurisdiction may specify and describe their supportive housing needs. The jurisdiction can use the Non-Homeless Special Needs Table (formerly Table 1B) of their Consolidated Plan to help identify these needs.
*Note: HOPWA recipients must identify the size and characteristics of the population with HIV/AIDS and their families that will be served in the metropolitan area.
2. Identify the priority housing and supportive service needs of persons who are not homeless but may or may not require supportive housing, i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction by using the Non-homeless Special Needs Table.
3. Describe the basis for assigning the priority given to each category of priority needs.
4. Identify any obstacles to meeting underserved needs.
5. To the extent information is available, describe the facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.
6. If the jurisdiction plans to use HOME or other tenant based rental assistance to assist one or more of these subpopulations, it must justify the need for such assistance in the plan.

1. Need for Supportive Housing

Persons with special needs include the elderly and frail elderly, persons with severe mental illness, persons with developmental and physical disabilities, persons suffering from drug and alcohol addiction, public housing residents, and persons living with HIV/AIDS. Many persons with such special needs also have very low incomes. It is very difficult to determine the number of individuals with special needs in the City of Allentown. The unmet needs data in this section of the CP was obtained from interviews with area organizations that serve special needs populations and also from completed surveys from service providers.

Supportive housing is defined as living units that provide a planned services component with access to a wide range of services needed for the resident to achieve personal goals. Various populations with special needs require supportive housing. For some individuals, supportive housing is needed because they are

unable to undertake the activities of daily living without assistance. The needs of the City's special needs subpopulations are described below.

Elderly and Frail Elderly

When a person has one or more limitations on activities of daily living, he or she may need assistance to perform routine activities such as bathing and eating. Therefore, elderly persons that need supportive housing are considered frail. Elderly persons typically need housing assistance for financial reasons or for supportive service to complete their daily routines. Supportive housing is needed when an elderly persons is both frail and very low income. Elderly persons that are living on fixed, very low incomes also need affordable housing options.

Using population trends from Census and American Community Survey data, it is possible to extrapolate the elderly population in the City of Allentown. The data shows a steadily declining elderly population (65 years and up) that will continue to decrease through 2014. In 1990, there were 17,767 persons aged 65 and over, representing 16.9% of the population. By 2000, these numbers had decreased to 16,144I and 15.1%, respectively. In the 2008 American Community Survey estimate, there were 12,968 elderly persons, representing 11.4% of Allentown's population. Extrapolating these trends to 2014 results in 10,136 person aged 65 and over in Allentown, representing 8.1% of the population. (Although overall numbers are declining, a supply of affordable and accessible housing will be necessary to serve the needs of this subpopulation.

Mentally Ill

Severe mental illness includes the diagnosis of psychoses and major affective disorders such as bipolar disorder and major depression. The condition must be chronic, meaning it has existed for at least one year, to meet the HUD definition for a disability.

The prevalence of mental illness in the City of Allentown can be inferred from the number of people receiving treatment. The latest data from the Lehigh Valley Assertive Community Treatment indicates that a Community Treatment Team census of 301 individuals, with 143 (47.5%) receiving Intensive Case Management.

Many nonprofit service providers throughout Lehigh County provide a full range of mental health treatment options, including treatment programs, vocational and educational programs, case management, housing, transportation, home health aides, self-help assistance, advocacy and recreational opportunities.

Developmentally Disabled

The base definition of developmental disability is an IQ score of less than 70. Within the City, it is unknown how many non-homeless developmentally disabled individuals are in need of supportive housing. Various agencies provide housing, residential treatment, and other supportive services for such persons, including Lehigh County Conference of Churches and the Lehigh Valley Center for Independent Living, among others.

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.

Disability data more recent than the 2000 Census is not available from the American Community Survey. In 2000, 40,150 (37.7%) of persons over age five in the City suffered from at least one type of disability. The Lehigh Valley Center for Independent Living (LVCIL) provided housing services to 93 Allentown residents in FY2008. Although it is not known exactly how many persons with disabilities are currently living in Allentown, LVCIL has determined a list of priorities for this population, including:

- A focus on the housing needs of LMI individuals;
- Construction of new affordable housing utilizing abandoned properties;
- Encouraging landlords and homeowners to make accessibility improvements on residential structures; and
- A focus on the needs of young adults with disabilities.

Persons with Alcohol and Other Drug Addictions

Alcohol or other drug abuse is defined as an excessive and impairing use of alcohol or other drugs, including addiction. Persons who are classified with alcohol or other addictions may have a history of inpatient treatment, be identified by current symptomology or by an assessment of current intake, or by some combination of these approaches.

There are a number of organizations in Allentown that provide drug and alcohol treatment and support, including:

- Allentown Rescue Mission
- Treatment Trends, Inc.
- Step by Step, Inc.
- Council on Alcohol and Drug Abuse

The significant number of facilities and agencies indicates that this is a substantial problem in the City, and that more housing and services are required for this subpopulation.

Public Housing Residents

Persons living in public or assisted housing may want to leave public housing if their living situation is stabilized or if homeownership opportunities were available. Family self-sufficiency programs and homeownership programs provide such opportunities.

Allentown Housing Authority (AHA) manages public housing within Allentown. The table below illustrates the need for public housing as identified by AHA.

Allentown Housing Authority Public Housing Waiting List		
	# of Families	% Total
WAITING LIST TOTAL	2,918	---
Extremely Low Income (<30%AMI)	2,459	84.3%
Very Low (>30% AMI, <50% AMI)	346	11.9%
Low (>50% AMI, <80% AMI)	113	3.9%
Small Family	2,613	89.5%
Large Family	305	10.5%
Elderly	152	5.2%
Individuals/Families with Disabilities	699	24.0%
RACE/ETHNICITY*		
White	2,168	77.3%
Black	637	22.7%
Hispanic	1,971	70.3%
Other	0	0.0%
BEDROOM SIZE		
1 Bedroom	201	7.0%
2 Bedroom	1,561	54.7%
3 Bedroom	924	32.4%
4 Bedroom	154	5.4%
5+ Bedroom	14	0.5%
* Racial data may not add up to Total # of Families since Hispanic is an ethnicity and respondents may be of any race.		
Source: Allentown Housing Authority, 2010		

2. Priority Housing and Supportive Service Needs

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. 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 that still own their homes, as this population survives on fixed incomes.

3. Basis for Assigning Priority

The priorities were developed by:

- Weighing the severity of the need among all groups and subgroups;
- Analyzing the current social, housing, and economic conditions;
- Analyzing the relative needs of LMI families;
- Assessing the resources likely to be available over the next five years; and
- Evaluating input from focus group sessions, interviews, service provider surveys, City departmental staff, public hearings, and the online resident survey.

4. Obstacles to Meeting Underserved Needs

The City has identified several obstacles that will impede its ability to address the identified needs in the five-year CP. These include the following:

- The primary obstacle to meeting underserved needs in the City of Allentown is the **limited financial resources** available to address identified priorities; and
- Intensifying the impact of limited available funding is the current **increase in home foreclosures** in the City, **increased unemployment, increased homelessness and risk of homelessness**, and **need for increased supportive services** for the growing population that is negatively affected by the economy and finds itself with fewer resources. The City, along with most communities, has even fewer resources available to address these issues as municipalities themselves face revenue reductions.

5. Inventory of Existing Facilities and Services

The following table includes facilities and services that assist persons who are not homeless but who require supportive housing, and programs that ensure that persons returning from mental and physical health institutions receive appropriate supportive housing.

Local Resources for Special Needs Populations

Domestic Abuse Victimes	Youth
Turning Point of the Lehigh Valley	Lehigh County Conference of Churches
Valley Youth House Committee, Inc.	The Salvation Army
	Lehigh County Department of Human Services
Elderly	Lehigh Carbon Community College
Lehigh County Conference of Churches	Embrace Your Dreams
The Salvation Army	
Lehigh County Department of Human Services	Boy Scouts of America
Lehigh Valley Center for Independent Living	Allentown City School District
	Community Music School
Physically/Developmentally Disabled	Valley Youth House Committee, Inc.
Valley Housing Development Corporation	Substance Abuse
Lehigh County Conference of Churches	Lehigh County Conference of Churches
The Salvation Army	
Lehigh County Department of Human Services	Allentown Rescue Mission
	Lehigh County Department of Human Services
Lehigh Carbon Community College	
Lehigh Valley Center for Independent Living	Employment
Allentown City School District	Allentown Rescue Mission
Valley Youth House Committee, Inc.	Lehigh Carbon Community College
Lehigh Valley Assertive Community Treatment	
	HIV/AIDS
	Lehigh County Conference of Churches

Health Care Discharge

Hospitals in Pennsylvania must have written discharge policies for appropriate referral and transfer plans that comply with Pennsylvania Code (028 Section 105). Further, the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) requirements prohibit the release of individuals without a discharge plan that includes having a place to live. To provide further assistance in finding appropriate accommodations for persons with disabilities, the Commonwealth's Ten Year Plan to End Homelessness calls for increased use of SOAR (SSI/SSDI Outreach, Access, and Recovery Program). SOAR allows users to explore various accommodation options for people with disabilities. The system is currently in use in Lehigh and Allegheny Counties, and Philadelphia.

Mental Health Discharge

The Commonwealth of Pennsylvania has a formal policy that no discharge from a state hospital can occur unless all housing, treatment, case management, and rehabilitation services are in place at the county level. The Pennsylvania Department of Public Welfare/Office of Mental Health and Substance Abuse Services (OMHSAS) sets this policy. In 2006, the Housing Work Group of the Adult Advisory Committee of the OMHSAS unveiled the *Plan for Promoting Housing and Recovery-Oriented Services*. The Housing Work Group offered the following philosophy:

“Stable housing is an essential component of mental health recovery. People with serious mental illness and co-occurring disorders must have access to a comprehensive array of permanent, affordable, barrier free housing options as well as the supports necessary for them to obtain and maintain the housing of their choice.”

Correctional Institution Discharge

The Commonwealth of Pennsylvania has a formal policy that no individual may be discharged from a State Correctional Institution without an approved Home Plan. It requires the continuity of care planners in each institution make every effort to assure a viable home plan and follow-up services for all who will be released. In order to expedite re-entry, the PA Department of Corrections (DOC) issued a policy statement on Inmate Reentry and Transition on January 5, 2006. This policy includes providing each inmate being released from a State Correctional Institution with written information on housing, a photo ID, and other personal documents. Regional efforts which bring life to the guiding vision and policy of the Dept. of Corrections include:

SPORE (Special Program for Offenders in Rehabilitation and Education): Identifies persons with a serious mental illness involved in the criminal justice system; provides advocacy, accountability, and assistance thereby leading the person to a greater degree of health, responsibility, proficiency, and quality of life.

MISA (Mental Illness/Substance Abuse): Inmates of Lehigh County Prison with an identified psychiatric disorder are assessed for secondary drug and/or alcohol abuse issues as part of their initial evaluation. Treatment services are provided and wrap around to community-based providers. Recovery tools are provided that may help inmates learn to stay clean and sober and housed upon discharge.

6. Justification of Use of HOME funds for TBRA

According to the CHAS 2000 data presented in the Housing Needs section, the City of Allentown has a high number (51.5%) of cost-burdened rental households. Additionally, the waiting list for Section 8/Housing Choice Vouchers from the Allentown Housing Authority is currently closed, and will be reopened when the waiting list is one year or less. These factors indicate an unmet demand for housing assistance among low-income renters.

Housing Opportunities for People with AIDS (HOPWA)

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. The Plan includes a description of the activities to be undertaken with its HOPWA Program funds to address priority unmet housing needs for the eligible population. Activities will assist persons who are not homeless but require supportive housing, such as efforts to prevent low-income individuals and families from becoming homeless and may address the housing needs of persons who are homeless in order to help homeless persons make the transition to permanent housing and independent living. The plan would identify any obstacles to meeting underserved needs and summarize the priorities and specific objectives, describing how funds made available will be used to address identified needs.
2. The Plan must establish annual HOPWA output goals for the planned number of households to be assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. The plan can also describe the special features or needs being addressed, such as support for persons who are homeless or chronically homeless. These outputs are to be used in connection with an assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
3. For housing facility projects being developed, a target date for the completion of each development activity must be included and information on the continued use of these units for the eligible population based on their stewardship requirements (e.g. within the ten-year use periods for projects involving acquisition, new construction or substantial rehabilitation).
4. The Plan includes an explanation of how the funds will be allocated including a description of the geographic area in which assistance will be directed and the rationale for these geographic allocations and priorities. Include the name of each project sponsor, the zip code for the primary area(s) of planned activities, amounts committed to that sponsor, and whether the sponsor is a faith-based and/or grassroots organization.
5. The Plan describes the role of the lead jurisdiction in the eligible metropolitan statistical area (EMSA), involving (a) consultation to develop a metropolitan-wide strategy for addressing the needs of persons with HIV/AIDS and their families living throughout the EMSA with the other jurisdictions within the EMSA; (b) the standards and procedures to be used to monitor HOPWA Program activities in order to ensure compliance by project sponsors of the requirements of the program.
6. The Plan includes the certifications relevant to the HOPWA Program.

NOT APPLICABLE.

Specific HOPWA Objectives

1. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

NOT APPLICABLE.

OTHER NARRATIVE

Include any Strategic Plan information that was not covered by a narrative in any other section.



First Program Year Action Plan

The CPMP First Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 1 Action Plan Executive Summary:

A. Purpose of Annual Plan

The City of Allentown has prepared the Year 1 Action Plan as required under 24 CFR 91.220. The Action Plan for FY2010 identifies the activities to be funded with the City's Community Development Block Grant (CDBG) (\$3,244,529), Home Investment Partnerships (HOME) (\$1,276,366), and Emergency Shelter Grant (ESG) (\$121,038) funds that it will receive during the program year.

B. Citizen Participation

The City will make copies of the draft CP available for public review and comment for 30 days. The CP will also be posted on the City's website, www.allentownpa.gov. The draft CP will be available at the following locations, in accordance with Allentown's Citizen Participation Plan:

- Department of Community and Economic Development
435 Hamilton Street
Allentown, PA 18101
- The Allentown Public Library
1210 Hamilton Street
Allentown, PA 18102
- The Lehigh Valley Center for Independent Living
435 Allentown Drive
Allentown, PA 18109

To further develop input, Allentown conducted two public hearings to solicit input into the preparation of the Five-Year Strategic Plan and the Action Plan. In addition

to public advertisements, invitations were extended to stakeholders and focus groups during interview sessions, and posted online to make to process accessible to citizens. The meetings were also advertised in *The Morning Call*.

The City conducted two Public Needs Hearings on January 14, 2010; one was held at 10:00 am and one was held at 6:00 pm at the Council Chambers, City Hall, 435 Hamilton Street, Allentown, PA. The hearings were scheduled in accordance with the City's Citizen Participation Plan. A public notice for the hearing was published in *The Morning Call*, a copy of which is included in Additional Information – Appendix C. Notices also were posted in community buildings throughout the city, including the Allentown City Hall and Allentown Housing Authority sites as well as on the City's website, www.allentownpa.gov.

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. The Department of Community and Economic Development produces and makes available a Consolidated Grants Program Application Package for potential applicants.

C. Priorities

The City of Allentown is committed to allocating funds that serve the needs of the lowest income and most disadvantaged residents. Households with incomes less than 50% of the area median income, particularly those with extremely low incomes (less than 30% of area median income), are particular priorities. The City has also identified special needs individuals as among those who face the greatest challenges and who should receive high priority in the expenditure of federal funds, including at-risk children and youth, low income families, the homeless and persons threatened with homelessness, the elderly, and persons with disabilities. The following needs address these priorities:

- Affordable and quality rental housing and homeownership opportunities;
- Investment in community development activities, parks, and infrastructure in lower income and deteriorating neighborhoods and in facilities that serve lower income populations; and
- Increased economic opportunities through improved physical and utility infrastructure, as well as job-creation incentives for businesses.

By focusing on these needs, Allentown seeks to address community concerns such as:

- The provision of decent, safe, and affordable housing;
- The preservation and improvement of the quality of life experienced in Allentown's neighborhoods, and the promotion of civic and neighborhood pride as well as respect for one's neighbors;
- The improvement of the availability and accessibility of schools, churches, parks, recreational programs and facilities, and community centers for use as neighborhood resources and places for people to gather and recreate;
- The improvement of the standard of living of City residents

The CP requires Allentown to specifically address needs and proposed strategies in the following three areas: housing, homelessness, and community development.

Priority Housing Needs

- *Creation of more decent, safe, and affordable housing for households below 80% of the area median income:* From 1990 to 2000, U.S. Census figures indicate that the percentage of occupied housing units decreased significantly from 93.7% to 91.5%. Recent estimates show the percentage of occupied housing in Allentown rising to 91.9% by 2008. Despite this rise, housing remains unattainable for a growing percentage of the City's residents. An increase in population, coupled with the economic recession and speculators purchasing properties downtown, have resulted in housing that is unaffordable for LMI households.
- *Maintain and improve the condition of the existing housing stock, particularly in the Focus Area, to meet or exceed current codes:* This strategy includes 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.
- *Creation of new affordable homeownership opportunities within the existing housing stock for LMI households:* Affordability is defined as spending no more than 35% of household income on housing related costs. This strategy involves a three-part approach focusing on: the acquisition of vacant or deteriorated properties for rehabilitation by first-time homebuyers; provision of housing rehabilitation loans; and the development of programs and incentives that encourage homeownership, particularly in the Focus Area.
- *Increase the knowledge and skills necessary for residents to own and maintain their own home:* This strategy involves support for counseling and home-buying guidance for individuals and families, a need made especially imperative in the wake of the national foreclosure crisis. Efforts should be directed towards the City's Focus Area, where homeownership rates are low.

Homeless Needs and Strategies

The priorities for ending homelessness are based on the recognition that homelessness results from more than simply a lack of affordable housing, although providing housing is the ultimate objective. In June 2007, the City of Allentown officially completed its **Plan to End Chronic Homelessness by 2017**. One recommendation of the plan to end homelessness was the creation of the Allentown Commission to End Chronic Homelessness. The Commission is now working to coordinate and support the efforts of all nearby governments, law enforcement and other public safety officials, hospitals, and other public welfare agencies and safety net providers. The plan envisions a system in which public and private agencies work together as a consortium to procure and manage housing, provide central intake services, and deliver support services to clients through a coordinated case management system.

Priority Homeless Needs

The Allentown/Northeast PA Regional Homeless Advisory Board (RHAB) Continuum of Care has identified the following strategies for addressing homeless needs in Allentown and throughout its service area. The following goal statements represent priority objectives for the homeless population in Allentown and Northeast PA developed by the Continuum of Care for the 12 months from 2009 to 2010:

- The HUD objective of at least 65% of homeless persons moving from transitional to permanent housing has been exceeded by 15% and will be maintained at 80%;
- The HUD objective of increasing to at least 77% the homeless persons staying in permanent housing over six months has been exceeded by six percent and will be maintained at 83%;
- The HUD objective of increasing the percentage of homeless persons employed at exit from 20% to 22% has been exceeded by 13% and will be maintained at 35%;
- Decrease the number of homeless households with children through by increasing transitional housing beds; and
- Create new permanent housing beds for chronically homeless persons.

Community Development Needs and Strategies

Based upon outreach efforts, the following community development needs were determined to have a high priority and will be the emphasis of the CDBG funding that is not directed towards housing rehabilitation:

- *Revitalizing Allentown' economy* through small business micro-loans, vocational/educational training of City residents, and promotion of new activities in the downtown;
- *Upgrading infrastructure in downtown Allentown* – rehabilitation of public infrastructure, including streets, sidewalks, parks, and facilities, to attract businesses and residents back into the community; and
- *Improve Downtown Neighborhoods* – by rehabilitating the existing housing stock and creating homeownership and rental housing opportunities through new construction on vacant and underutilized sites.

D. Resources

Federal Resources

The national Community Development Block Grant (CDBG) and HOME Investment Partnership Program continue to be principal revenue sources for the City to address the needs of its low to moderate income residents.

Allentown will have \$3,244,529 in CDBG program funds, \$1,276,366 in HOME funds, and \$121,038 in Emergency Shelter Grant funds. The City anticipates that 100% of its CDBG resources this year, other than those allocated for administration/planning, will be spent to benefit low and moderate income residents.

It is estimated that approximately \$4,641,933 in federal resources will be available to provide services in Allentown through social service agencies.

Other Resources

In addition to this year's funds, the City has reprogrammed unspent funds totaling \$1,176,043 from previous years' CDBG program grants for FY2010. The funds will be used to fund additional rehabilitation and community development activities.

E. Housing & Community Development Activities

The Fiscal Year 2010 Annual Plan for the City of Allentown includes \$3,244,529 in FY2010 CDBG funds, \$1,276,366 in FY2010 HOME funds, and \$121,038 in ESG funds, as well as \$1,176,043 in reprogrammed funds from previous years. The 2010 Annual Plan provides federal funds for the following activities:

FY2010 Planned Expenditures – CDBG, HOME, & ESG

CDBG Program Funds	
CDBG Projects	Funding Amount
Acquisition	\$265,000
Rehabilitation (Focus Area)	\$506,082
Hazard Elimination Program	\$100,000
Program Delivery (incl. Salaries to be Apportioned)	\$854,366
Allentown YMCA & YWCA	\$15,000
Lehigh Valley Center for Independent Living	\$15,000
Literacy Center	\$15,000
Lehigh County Conference of Churches - Daybreak	\$15,000
Grace Montessori School	\$15,000
The Baum School of Art	\$5,625
Communities in Schools	\$10,000
CACLV - Community Action Financial Services	\$15,000
Neighborhood Housing Services of the Lehigh Valley	\$15,000
Boys and Girls Club of Allentown	\$15,000
St. Luke's Neighborhood Center	\$15,000
Mosser Village Family Center	\$15,000
Community Bike Works	\$15,000
Embrace Your Dreams	\$8,285
Family Answers - Ways to Work	\$15,000
Allentown Public Library	\$9,000
Lehigh Carbon Community College	\$9,894
Syrian Arab-American Charity Association	\$15,000
Program for Women and Families	\$15,000
AEDC - Securing Industrial/Commercial Properties	\$13,500
AEDC - Economic Development Planning	\$120,000
Workforce Development - Allentown Rescue Mission	\$40,000
Alliance Summer Recreation Program	\$5,500
Turning Point of the Lehigh Valley	\$12,000
Residential Façade Grants (Focus Area)	\$175,000
Voluntary Relocation	\$5,000
Old Allentown Preservation Association	\$35,000
Neighborhood Housing Services - CPP Program	\$150,000
Redevelopment Authority of the City of Allentown	\$297,777
Community Action Development Corp. of the Lehigh Valley	\$32,500
Fair Housing	\$20,000
Community Development Planning	\$10,000
Administration	\$350,000
TOTAL	\$3,244,529

HOME & ESG Program Funds	
HOME Projects	Funding Amount
SFL Rehabilitation (Focus Area)	\$273,918
Housing Association & Development Corp. - CHDO Activity	\$119,250
Cumberland Gardens Rehabilitation	\$250,000
Housing Association & Development Corp. - CHDO Operating	\$48,371
Alliance for Building Communities - CHDO Activity	\$39,750
Alliance for Building Communities - CHDO Operating	\$5,000
Housing Development Corporation of Lancaster County	\$433,333
Administration	\$106,744
TOTAL	\$1,276,366
ESG Projects	
CACLV - Sixth Street Shelter	\$29,000
Allentown Rescue Mission	\$29,000
Salvation Army - Allentown, PA Corps	\$29,000
Lehigh County Conference of Churches - Pathways	\$29,000
Administration	\$5,038
TOTAL	\$121,038

F. Evaluation of Past Performance

The City of Allentown prepared a Consolidated Annual Performance and Evaluation Report (CAPER) for FY2008 (July 1, 2008 to June 30, 2009). This CAPER was the fourth of the prior five-year period and reported the FY2008 accomplishments of Allentown’s CDBG, HOME and ESG Programs. Allentown is currently in the second half of FY2009, and its Annual Action Plan developed for this year is outlined below.

During FY2009, the City of Allentown received \$3,041,659 in CDBG funds, \$725,326 in HOME funds, and \$121,670 in ESG funds. Expenditures were more than the grant funds received, since prior year money was still available for expenditure. 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 in 2010.

The CDBG funds were spent on a variety of activities in the following eligible categories:

- Public Services \$324,449
 - Public Facilities \$339,282
 - Property Acquisition \$257,947
 - Code Enforcement \$178,436
 - Demolition \$42,065
 - Relocation \$84,077
 - Direct Homeownership Assistance \$67,097
 - Disposition \$113,013
 - Housing Rehabilitation \$1,023,010
 - Commercial Façade Improvements \$39,379
 - Micro-enterprise Assistance \$23,409
 - Planning \$131,069
 - Administration \$418,426
- Total \$3,041,659**

The HOME grant of \$958,510 was expended on the following eligible activities:

• Housing Rehabilitation	\$494,582
• CHDO Set-Aside	\$82,986
• Administration	<u>147,758</u>
Total	\$725,326

The ESG grant of \$121,670 was expended on the following eligible activities:

• Allentown Rescue Mission	\$29,000
• The Salvation Army – Allentown, PA Corps	\$29,000
• CACLV – Sixth Street Shelter	\$29,000
• Lehigh Co. Conference of Churches – Daybreak	\$29,000
• Administration	<u>\$5,670</u>
Total	\$121,670

In FY2009, all CDBG funds expended for activities met one of the national objectives as defined under the CDBG regulations. In FY2009, CDBG-funded activity expenditures totaled \$2,718,533, with 100% benefiting low and moderate income persons.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.
4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Program Year 1 Action Plan General Questions response:

1. Description of the Geographic Area

The following narrative describes the characteristics of the areas in Allentown where a majority of low and moderate income persons reside. Because 70% of the City's CDBG funds must benefit low and moderate income persons, a significant portion of the City's CDBG funds may be spent in these areas. However, the City is also committed to investing CDBG resources in other non-impacted areas of Allentown while continuing to benefit low and moderate income persons.

The City of Allentown is more racially diverse than both Lehigh County and the state of Pennsylvania. This is the result of dramatic shifts in population during the 1990s and 2000s. During these two decades, the percent of Whites decreased from 86.2% to 64.8% of the population, while Blacks (5.0% to 12.4%), Other Races (7.3% to 17.5%), and people of Hispanic origin (11.7% to 37.4%) all significantly increased as a percentage of the total population.

Between 1990 and 2000, the racial minority percentage of Allentown' population increased by 14,522 individuals (a 99.9% increase), rising from 13.8% to 35.2% of the population. Most of this increase was in the number of persons who describe their race as Black and those who describe themselves as being of "Other." Between 2000 and 2008, the number of minorities in Allentown rose from 29,055 to an estimated 40,189, a difference of 38.3%. Details appear in the following table.

Persons of Hispanic origin may give their race as White, Black, or another race. Between 1990 and 2000, the Hispanic population grew by 13,696 individuals (an increase of 111.6%), from 12,274 persons representing 11.7% of the population, to 25,970 persons representing 24.4% of the population. By 2008, the Hispanic population had grown to 42,750 individuals, an increase of 16,780 persons (64.6%).

Population by Race and Hispanic Origin, 1990-2008

Location	Total Population	Persons of One Race										Persons of Two or More Races*		Persons of Hispanic Origin	
		White		Black		American Indian/Alaska Native		Asian/Pacific Islander		Other		#	%	#	%
		#	%	#	%	#	%	#	%	#	%				
1990															
Pennsylvania	11,881,643	10,520,201	88.5%	1,089,795	9.2%	14,733	0.1%	137,438	1.2%	119,476	1.0%	---	---	232,262	2.0%
Lehigh County	291,130	271,674	93.3%	6,776	2.3%	320	0.1%	3,661	1.3%	8,699	3.0%	---	---	15,001	5.2%
Allentown	105,090	90,557	86.2%	5,230	5.0%	186	0.2%	1,414	1.3%	7,703	7.3%	---	---	12,274	11.7%
2000															
Pennsylvania	12,281,054	10,486,177	85.4%	1,211,669	9.9%	19,511	0.2%	220,352	1.8%	188,186	1.5%	155,159	1.3%	392,121	3.2%
Lehigh County	312,090	271,599	87.0%	10,449	3.3%	721	0.2%	6,971	2.2%	16,341	5.2%	6,009	1.9%	31,811	10.2%
Allentown	106,632	77,577	72.8%	7,790	7.3%	460	0.4%	2,753	2.6%	14,057	13.2%	3,995	3.7%	25,970	24.4%
2008															
Pennsylvania	12,448,279	10,428,104	83.8%	1,288,057	10.3%	17,573	0.1%	300,482	2.4%	229,347	1.8%	184,716	1.5%	595,128	4.8%
Lehigh County	339,989	281,416	82.8%	18,270	5.4%	630	0.2%	9,832	2.9%	23,997	7.1%	5,844	1.7%	54,514	16.0%
Allentown	114,210	74,021	64.8%	14,138	12.4%	283	0.2%	2,685	2.4%	19,972	17.5%	3,111	2.7%	42,750	37.4%

* Persons of two or more races were not documented in the 1990 Census

Source: U.S. Census 1990, SF1 (P001,P006,P008); Census 2000, SF3 (P1,P6,P7); 2008 American Community Survey 1-Year Estimates (B01003,B02001,B03002)

Concentrations of Minority and Hispanic Persons

The following table presents population by race and Hispanic origin. The data is presented by census tract for 106,632 residents in Allentown in 2000. HUD defines areas of racial or ethnic concentration as geographical areas where the percentage of minorities or ethnic persons is at least 10 percentage points higher than in the City overall.

Population by Race and Hispanic Origin, 2000

	Total Population	White	%	Black	%	Asian/Pacific Islander	%	Hispanic*	%
Allentown Total	106,632	77,577	72.8%	7,790	7.3%	2,753	2.6%	25,970	24.4%
Tract 0001	7,412	5,868	79.2%	334	4.5%	307	4.1%	935	12.6%
Tract 0002	589	546	92.7%	37	6.3%	0	0.0%	77	13.1%
Tract 0003	6,867	4,605	67.1%	602	8.8%	144	2.1%	2,375	34.6%
Tract 0004	3,412	2,224	65.2%	134	3.9%	60	1.8%	1,099	32.2%
Tract 0005	2,271	1,019	44.9%	336	14.8%	18	0.8%	1,415	62.3%
Tract 0006	5,766	4,060	70.4%	362	6.3%	140	2.4%	1,569	27.2%
Tract 0007	3,449	1,954	56.7%	426	12.4%	69	2.0%	1,384	40.1%
Tract 0008	3,615	1,787	49.4%	221	6.1%	119	3.3%	1,846	51.1%
Tract 0009	1,697	645	38.0%	247	14.6%	44	2.6%	1,014	59.8%
Tract 0010	2,777	1,473	53.0%	349	12.6%	7	0.3%	1,570	56.5%
Tract 0011	793	474	59.8%	84	10.6%	0	0.0%	384	48.4%
Tract 0012	2,206	1,185	53.7%	390	17.7%	124	5.6%	943	42.7%
Tract 0013	2,143	1,257	58.7%	334	15.6%	101	4.7%	761	35.5%
Tract 0014.01	6,398	5,237	81.9%	408	6.4%	189	3.0%	971	15.2%
Tract 0014.02	1,957	1,759	89.9%	53	2.7%	48	2.5%	148	7.6%
Tract 0015.01	6,033	4,208	69.7%	333	5.5%	208	3.4%	1,706	28.3%
Tract 0015.02	6,042	4,959	82.1%	390	6.5%	204	3.4%	530	8.8%
Tract 0016	3,448	2,129	61.7%	439	12.7%	26	0.8%	1,218	35.3%
Tract 0017	4,006	2,652	66.2%	365	9.1%	113	2.8%	1,324	33.1%
Tract 0018	4,043	2,459	60.8%	576	14.2%	41	1.0%	1,507	37.3%
Tract 0019	4,001	3,363	84.1%	190	4.7%	52	1.3%	538	13.4%
Tract 0020	4,479	3,107	69.4%	467	10.4%	69	1.5%	1,133	25.3%
Tract 0021	6,075	4,682	77.1%	454	7.5%	196	3.2%	976	16.1%
Tract 0022.01	4,410	4,156	94.2%	71	1.6%	0	0.0%	210	4.8%
Tract 0022.02	4,017	3,691	91.9%	46	1.1%	113	2.8%	184	4.6%
Tract 0023.01	5,686	5,272	92.7%	73	1.3%	317	5.6%	19	0.3%
Tract 0023.02	3,040	2,806	92.3%	69	2.3%	44	1.4%	134	4.4%

Source: Census 2000, SF3 (P6,P7)

In the City of Allentown, minority persons comprised 35.2% of the population. More specifically: Blacks comprised 7.3% of the population (17.3% threshold); Asians comprised 2.6% (12.6% threshold); and persons of Hispanic origin comprised 24.4% (34.4% threshold). In Allentown, there was one census tract that met the criteria for areas of racial concentration. It includes:

- Census Tract 12

In addition, persons of Hispanic origin represented 24.4% of the population in the City of Allentown. Therefore, an area of ethnic concentration includes the census tracts where the percentage of Hispanics is 34.4% or higher. There were 11 census tracts in Allentown which fit this criterion. They are:

- Census Tract 3
- Census Tract 5
- Census Tract 7
- Census Tract 8
- Census Tract 9
- Census Tract 10

- Census Tract 11
- Census Tract 12
- Census Tract 13
- Census Tract 16
- Census Tract 18

Low and Moderate Income Areas

The following table presents information regarding low and moderate income (LMI) persons in Allentown. LMI persons, as determined by HUD, have incomes at or below 80% of the median family income (MFI). In its 2009 estimates, HUD determined that there were 60,370 LMI persons in Allentown, equivalent to 59.4% of the population for whom this rate is determined. 2008 American Community Survey reported that the 2008 MFI in Allentown was \$44,475.

HUD defines an LMI census tract as one in which 51% or more of the population have incomes of 80% or less of MFI. According to these criteria, 23 of the City's 27 census tracts, and 56 of the 86 census block groups, qualify as LMI areas. All block groups representing qualifying LMI areas are detailed in the following chart.

Low & Moderate Income Persons by Census Tract, 2009

Census Tract	Block Group	% LMI Persons
City Total		57.5%
0001	1	25.2%
	2	48.4%
	3	65.6%
	4	54.8%
	5	59.4%
	6	59.2%
0002	1	43.2%
0002	1	54.0%
	2	67.4%
0003	1	46.6%
	2	83.6%
	3	62.1%
	4	60.2%
0004	1	67.6%
	2	75.9%
0005	1	74.0%
	2	83.5%
0006	1	65.6%
	2	48.5%
	3	28.3%
	4	63.8%
0007	1	81.4%
	2	67.7%
	3	78.7%
0008	1	65.1%
	2	83.8%
	3	83.4%
	4	81.0%
0009	1	78.7%
0010	1	82.1%
	2	79.2%
0011	1	87.0%
0012	1	70.0%
0013	1	83.0%
0014.01	1	65.2%
	2	54.6%
	3	49.3%
	4	44.8%
	5	39.9%
0014.02	1	28.2%
	2	48.7%
0015.01	1	53.6%
	2	66.1%
	3	65.9%

Census Tract	Block Group	% LMI Persons
City Total		57.5%
0015.02	1	33.0%
	2	37.5%
	3	54.6%
	4	56.1%
0016	1	81.5%
	2	89.7%
	3	52.7%
0016	4	65.2%
	1	61.5%
0017	2	65.5%
	3	70.3%
	1	68.9%
0018	2	81.3%
	3	62.3%
	4	67.1%
0019	1	46.7%
	2	76.5%
0020	1	64.9%
	2	71.5%
	3	67.4%
	4	57.8%
	5	59.9%
0021	1	47.3%
	2	70.0%
	3	45.4%
	4	35.6%
	5	66.7%
0022.01	1	35.4%
	2	46.5%
	3	40.7%
0022.01	5	34.2%
	1	52.1%
0022.02	2	60.9%
	1	30.3%
0023.01	2	14.1%
	3	23.3%
	4	20.0%
	5	26.0%
	6	44.5%
	0023.02	1
2		32.8%
3		39.0%

Source: HUD 2000 LMI Estimates

Concentrations of LMI Persons, Minority Persons and Hispanics

There were 23 census tracts identified as having at least one LMI block group, with 16 of those tracts having all block groups as LMI areas. Of the 23 census tracts, all 11 were noted to be areas of minority/Hispanic concentration. They are:

- Census Tract 3
- Census Tract 5
- Census Tract 7
- Census Tract 8
- Census Tract 9
- Census Tract 10
- Census Tract 11
- Census Tract 12
- Census Tract 13
- Census Tract 16
- Census Tract 18

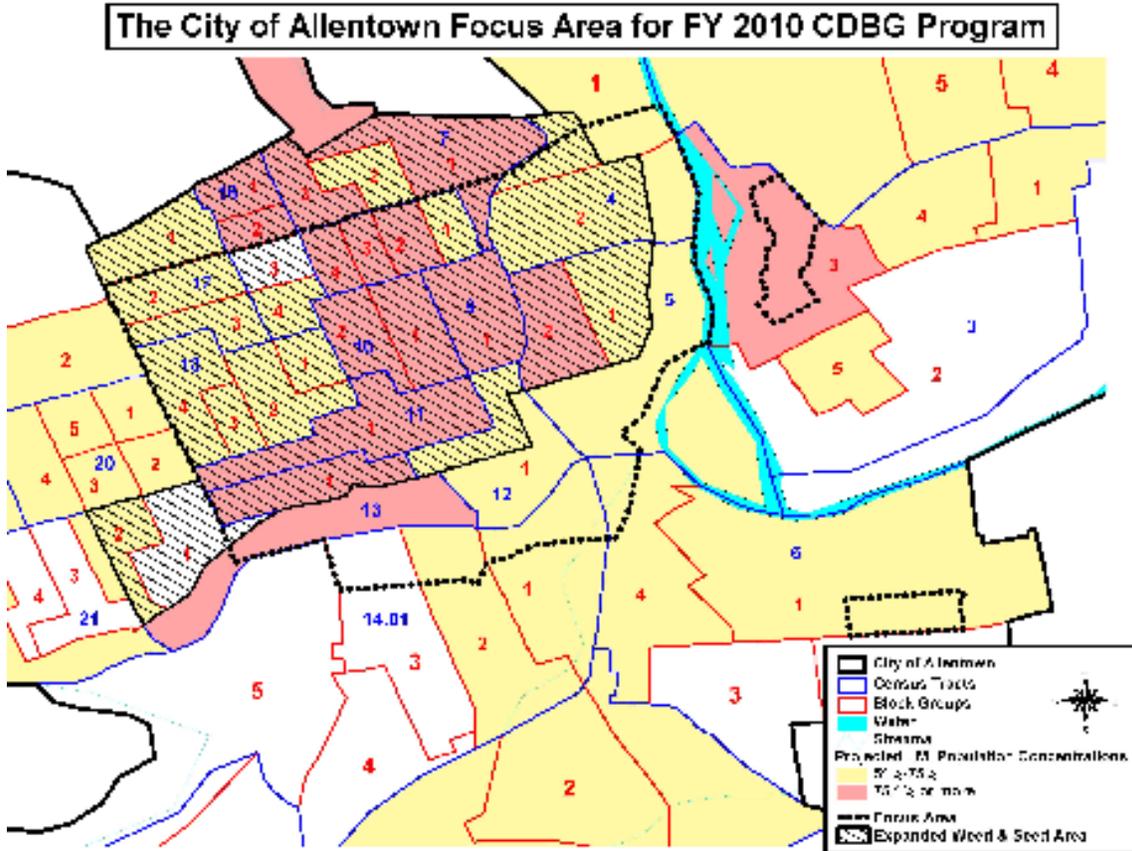
2. Basis for Allocating Investments

Federal CDBG 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 system for establishing the priority for the selection of these projects in the City of Allentown is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG program
- Meeting the needs of LMI residents
- Focusing on low and moderate income areas or neighborhoods
- Coordination and leveraging of resources
- Response to expressed needs
- Sustainability and/or long-term impact
- The ability to demonstrate measurable progress and success

Much of the City's funds are invested in the CDBG focus area in downtown Allentown. The previous map describes the distribution of the areas in Allentown with an LMI majority, racial and ethnic concentrations, and the expanded Focus Area for federal funds. Because 70% of the City's CDBG funds must benefit low and moderate income persons, a significant portion of the City's CDBG funds will be spent in these areas. These are concentrated in downtown Allentown, and are located primarily in census tracts 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14.01, 16, 17, 18, and 21. In particular, these census tracts contain the expanded Focus Area, which includes the Focus Area from the previous Consolidated Plan, as well as the proposed Weed & Seed Program area expansion, which are targeted for receiving CDBG and HOME funds. The map below shows this expanded Focus Area:



3. 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. 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 & 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.

4. Funds Expected to be Available

Currently, the City of Allentown receives CDBG, HOME, and ESG funds from HUD. These funding sources will be available to help support new affordable housing projects, housing rehabilitation programs, and homeless outreach and prevention activities. The City’s annual allocations from the entitlement grants are as follows:

CDBG: \$3,244,529

HOME: \$1,276,366
ESG: \$121,038

Additionally, the City has reprogrammed unspent funds totaling \$1,176,043 from previous years' CDBG program grants for FY2010. The funds will be used to fund additional rehabilitation and community development activities.

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

Program Year 1 Action Plan Managing the Process response:

1. Lead Agency

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 County Conference of Churches, Lehigh Valley Center for Independent Living, and the Salvation Army, will also be important.

2. Significant Aspects of the Process

In November 2009, the City engaged the services of Mullin & Lonergan Associates, Inc. to serve as consultant to the project. A project schedule was developed with the goal of submitting the adopted CP to HUD on or before May 15, 2010.

The City made the decision to encourage a high level of public communication and agency consultation in an effort to demonstrate its commitment to identifying priority needs and engaging the participation of citizens, public agencies, and nonprofit organizations in a positive and collaborative manner. A list of stakeholders and affordable housing providers was developed and included public agencies and private nonprofit organizations whose missions included the provision of affordable housing and human services to LMI households and persons. These stakeholders were invited to participate in completing specific provider-type surveys, as well as more general community needs surveys, held for the purpose of developing the CP.

The CP was developed using reliable data from sources such as the U.S. Census Bureau, HUD's State of the Cities Data System (CHAS data tables), the National Low Income Housing Coalition, the local real estate multi-list service database, municipal

departments, and several planning documents produced by or on behalf of Allentown. These include the City's FY2006-10 Consolidated Plan and FY2010 Action Plan, recent CAPER reports, and Allentown 2020: The City of Allentown Comprehensive Plan, among other items.

Additionally, public and private agencies which were identified as stakeholders in the process were asked to complete written questionnaires to provide data on special needs populations such as the elderly, youth, persons with HIV/AIDS, public housing residents, persons with disabilities, and the homeless. A community-wide, online survey was also conducted to get resident input. Copies of the written questionnaires sent to the various entities are included in Additional Information – Appendix C.

Based on the public hearings and stakeholder questionnaires, a set of priorities was established by the City for the next five years.

The required Public Needs Hearing was held on January 14, 2010 at the Council Chambers, City Hall, 435 Hamilton Street, Allentown, PA. Additionally, another Public Needs Hearing was held on April 27, 2010 at the same location. A number of concerns and issues were voiced by the community; a summary of these comments is included in the Citizen Participation section. Minutes of the hearing are also kept on file in the Department of Community and Economic Development.

A draft of the Consolidated Plan for 2010-2014 and the Annual Plan for FY2010 was placed on public display for 30 days beginning March 29, 2010 and ending April 28, 2010. City Council adopted the 5-Year Plan and Annual Action Plan at its regularly scheduled meeting on April 28, 2010.

3. Actions to Enhance Coordination

The City of Allentown has established a good working relationship with government agencies, housing development organizations, shelter providers, social service agencies, financial institutions, and community groups. City staff and elected officials attend many meetings to keep abreast of emerging issues in the community and provide input into the development of programs to address these concerns. The City is committed to continuing this effort in the future. In addition, the City will attempt to develop relationships with those agencies that are not part of the human service network and encourage them to coordinate their services with the City and other providers.

Various public agencies, housing groups, and private organizations submit input throughout the year that is part of the CP development process. These organizations include, but are not limited to:

Allentown Department of Community and Economic Development	Lehigh County Department of Human Services
Allentown Economic Development Corporation	Lehigh Valley Assertive Community Treatment
Allentown Housing Authority	Lehigh Valley Center for Independent Living
Allentown Rescue Mission	Neighborhood Housing Services of the Lehigh Valley, Inc.
Allentown City School District	Old Town Neighborhood Watch
Allentown YMCA & YWCA	Old Allentown Preservation Association
Boy Scouts of America, Minsi Trails Council	Pennrose Properties
Boys/Girls Club of Allentown	Redevelopment Authority of the City of Allentown
Community Action Committee of the Lehigh Valley - Sixth Street Shelter	Salvation Army
Community Music School	Syrian Arab American Charity Association
Congregations United for Neighborhood Action	Turning Point of The Lehigh Valley
Embrace Your Dreams	Valley Housing Development Corporation
Habitat For Humanity of the Lehigh Valley	Valley Youth House, Inc.
Hispanic Chamber of Commerce	West Park Civic Association
Housing Association & Development Corporation	West Walnut Neighborhood Association
Lehigh Carbon Community College	West Watch Neighborhood Group
Lehigh County Conference of Churches	

Participants in City and AHA housing programs will also be encouraged to participate in the Home Ownership Counseling Program, which will prepare them for buying and owning a home. In addition, the graduates of the program will be encouraged to participate in the homeownership programs sponsored by the Housing Association and Development Corporation (HADC), Habitat for Humanity of the Lehigh Valley, and Alliance for Building Communities (ABC).

Citizen Participation

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Program Year 1 Action Plan Citizen Participation response:

1. Summary of Citizen Participation Process

The City of Allentown has followed the same procedures in advertising the amount of assistance expected to be received and the range of activities to be undertaken during the fiscal year, including the estimated benefits for low and moderate income populations.

The City will make copies of the draft CP available for public review and comment for 30 days. The CP will also be posted on the City’s website, www.allentownpa.gov. The draft CP will be available at the following locations, in accordance with Allentown’s Citizen Participation Plan:

- Department of Community and Economic Development

435 Hamilton Street
Allentown, PA 18101

- The Allentown Public Library
1210 Hamilton Street
Allentown, PA 18102
- The Lehigh Valley Center for Independent Living
435 Allentown Drive
Allentown, PA 18109

The City conducted two Public Needs Hearings on January 14, 2010; one was held at 10:00 am and one was held at 6:00 pm at the Council Chambers, City Hall, 435 Hamilton Street, Allentown, PA. The hearing was scheduled in accordance with the City's Citizen Participation Plan. A public notice for the hearing was published in *The Morning Call*, a copy of which is included in Additional Information – Appendix C. Notices also were posted in community buildings throughout the city, including the Allentown City Hall and Allentown Housing Authority sites as well as on the City's website, www.allentownpa.gov.

2. Summary of Citizen Comments

The City received several public comments at both the January 14, 2010 and April 27, 2010 Public Needs Hearings. A summary of these comments is included in Additional Information – Appendix C.

3. Summary of Efforts Made to Broaden Public Participation

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, Lehigh Valley Center for Independent Living, and Syrian Arab American Charity Association. The City also works with Allentown Housing Authority, as well as private housing advocacy groups, to encourage the participation of the public housing residents. The Department of Community and Economic Development produces and makes available a Consolidated Grants Program Application Package for potential applicants.

4. Explanation of Comments Not Accepted

During the mandated 30-day public review, the City received **XX** comments and responded per its citizen participation plan requirements. The City of Allentown has made a concerted effort towards citizen outreach, including incorporation of citizen comments regarding the goals, objectives, and focus of the Consolidated Plan. Due to the limited funding available for the many projects proposed for the city, not all comments received have been incorporated into the plan.

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

Program Year 1 Action Plan Institutional Structure response:

1. 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. 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).

Public housing in Allentown is administered by 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.

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Program Year 1 Action Plan Monitoring response:

1. Monitoring of Activities

The City of Allentown has established a staff committee which meets bi-monthly to ensure implementation of the Consolidated Plan; assess and evaluate programs, policies, and procedures; and make program adjustments, as necessary. This working group will pay particular attention to the proposed accomplishments presented in this document.

Lead-based Paint

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Program Year 1 Action Plan Lead-based Paint response:

1. Actions to Evaluate and Reduce Lead-Based Paint Hazards

Due to the age of the housing stock, particularly the stock available to LMI households, Allentown's Bureau of Health has been active in preventing lead poisoning for children for over 25 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. The Health Bureau actively screens 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.

Combining efforts and expertise of the City's Bureau of Building Standards and Safety and Health Bureaus, the City's Lead Hazard Control program will focus on units – both owner-occupied and rental units – where children under the age of six reside. Many of these children have been tested by the Health Bureau and have been found to have dangerously high blood lead levels.

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 is funded through the CDBG Program. Over 5,000 homes have been inspected during the last 29 years. Also, the housing stock in the City is mostly brick, with few painted, wooden structures.

In addition to identifying children and families who may benefit from the LHC program, the Allentown Health Bureau incorporates numerous outreach and education strategies into its activities. Lead poisoning prevention education is offered to families with children under age six including minority and non-English speaking families. Additionally, lead poisoning prevention education is provided to pre-school, child care, and clinics.

Another major component of the LHC program is the training of contractors in Lead Safe Work Practices. In February 2004, 26 workers, representing eight contracting companies, were trained. More training will be offered in the future.

The new 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 25 years.

Administrative and code enforcement staff continued to take advantage of training opportunities. Also, staff worked to disseminate appropriate information to nonprofit organizations and contractors who will be impacted by these new regulations.

HOUSING

Specific Housing Objectives

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 1 Action Plan Specific Objectives response:

1. Specific Priorities and Objectives

The City of Allentown will invest its entitlement funds to create new and preserve existing affordable housing for households below 80% of median income in the neighborhoods within its Focus Area. Towards this end, the City has established the following housing priorities and objectives:

- **Priority Activity #1:** 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. The five year objectives are:
 - Inspect **1,500** properties and provide follow-up on prior years' inspections;
 - Continue aggressively enforcing overcrowding ordinances;
 - Encourage property owners, particularly LMI owners within the Focus Area, to apply for no-interest, self-forgiving loans;
 - Provide **175** housing rehabilitation self-forgiving loans to LMI homeowners residing within the Focus Area; and
 - Provide **50** Hazard elimination loans to LMI homeowners residing outside of the Focus Area.
- **Priority Activity #2:** 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). The five year objectives are:
 - Acquire, in conjunction with the Redevelopment Authority of the City of Allentown (RACA), at least **25** vacant properties for use in homeownership programs;

- Allocate acquired properties to nonprofits, including the Housing Association and Development Corporation and Alliance for Building Communities;
 - Assist **100** moderate income households in obtaining funds necessary for down payments and closing costs; and
 - Develop new programs to encourage potential homeowners to buy properties in the Focus Area.
- **Priority Activity #3:** To increase the knowledge and skills necessary for residents to own and maintain their own home. The five year objectives are:
- Educate at least **300** families, particularly targeting LMI households, through the Home Ownership Counseling Program.
- **Priority Activity #4:** To support the provision of decent, safe, and affordable rental housing with the City and on a regional basis. The five year objectives are:
- Rehabilitate **50** units; and
 - Systematically inspect all rental units within the city through the Rental Unit Inspection Program, which is not funded with CDBG dollars.
- **Priority Activity #5:** 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, to assist residents of the City in imminent danger of becoming homeless, and to assist residents in a continuum to find permanent housing. The five year objectives are:
- Provide supportive services such as counseling, case management, housing placement, and emergency rent assistance;
 - Provide **10** loans to LMI homeowners, specifically the elderly and disabled, for adaptive rehabilitation;
 - Aggressively seek additional funding sources for supportive housing for special needs populations;
 - Work closely with homeless service providers to meet the shelter and service needs of the homeless on a regional level; and
 - Assist regional service providers in connecting the homeless with permanent supportive housing solutions.

2. Resources Expected to be Available

The City of Allentown has identified a wide range of resources that can be invested to support the City's affordable housing initiatives. A summary of these resources, focusing on housing, is included below.

- Community Development Block Grant – the City anticipates receiving approximately \$3,244,529 in CDBG funds;
- HOME Investment Partnership – the City anticipates receiving approximately \$1,276,366 in HOME funds; and
- Emergency Shelter Grants – the City anticipates receiving approximately \$121,038 in ESG funds

In addition to these funds, the City has reprogrammed unspent funds totaling \$1,176,043 from previous years' CDBG program grants for FY2010. Many of these funds will be used to fund additional housing and rehabilitation activities. The City also will apply for funds from some or all of the programs listed below:

Federal Programs

- Section 8 Housing Choice Voucher
- Public Housing HOPE VI Grants
- Neighborhood Stabilization Program funds
- Low Income Housing Tax Credits
- Department of Justice Weed & Seed Program

State Resources

- PennHOMES
- Pennsylvania Housing Finance Agency
- State Low Income Housing Tax Credits

Lehigh County Resources

- Act 137 Affordable Housing Trust Fund

Private Resources

- Federal Home Loan Bank

Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Program Year 1 Action Plan Public Housing Strategy response:

1. Public Housing Activities

HUD has deemed the Allentown Housing Authority as a "High Performer" based on a rating analysis of twelve factors including vacancies, modernization, rent collection, unit turnaround, and condition of units. AHA currently owns and manages 1,292 conventional public housing units, primarily within 12 separate developments located throughout the City of Allentown. Almost all of the public housing units are occupied, with yearly turnover ranging from zero to 57 units among the 12 developments.

In addition, AHA owns and manages 107 units that were acquired and rehabilitated through the federal Section 8 Substantial Rehabilitation Program. Project-based vouchers are used to help pay off AHA debt. These units are also scattered throughout the City.

AHA also has plans during the FY2010-2014 period to convert 20 public housing units to the private housing market through first-time homeownership activities. AHA will continue to research ways to add public housing units to its inventory via acquisition and new construction/rehabilitation activities using Low Income Housing Tax Credit financing, among other sources of funds.

AHA reports that as of 2007, the majority of its housing stock is in good condition and meets all HUD standards and City housing codes. Only Cumberland Garden and several of the scattered site units are in need of major rehabilitation. This work will include reducing bedroom counts and creating accessible apartments where possible. The Housing Authority’s housing stock is identified in the following table.

Allentown Public Housing Inventory						
Development	Year of Initial Occupancy	# of Elderly Units	# of Family Units	Total Units	Occupancy Rate	Annual Turnover
GROSS TOWERS	1967	147	0	147	98%	39
CUMBERLAND GARDENS	1971	16	200	216	97%	57
WALNUT MANOR	1972	150	0	150	98%	26
700 BUILDING	1975	139	0	139	99%	19
TOWERS EAST	1975	129	0	129	100%	17
LITTLE LEHIGH	1975	0	76	76	99%	23
CENTRAL PARK	1976	87	0	87	100%	4
SCATTERED SITES	1983-1986	0	79	79	96%	11
OVERLOOK PARK 1A	2007	0	80	80	100%	0
OVERLOOK PARK 1B	2007	0	79	79	100%	0
OVERLOOK PARK 2A	2008	0	60	60	100%	0
OVERLOOK PARK 2B	2009	0	50	50	100%	0
TOTAL UNITS		668	624	1,292		196

Source: Allentown Housing Authority Survey, 2010

Over the last few years, the focus has been on making physical upgrades to all its family and elderly public housing developments through the annual Capital Fund grant (approximately \$2 million annually). Ongoing repairs and modernization activities include kitchen and bathroom modernizations, new HVAC and water improvements, new sidewalks, curbs, and roofing. As a result of recent receipt of additional funds through the federal Stimulus Bill, additional pressing repairs will be possible. Plans are to request funding for elderly services as well as new housing construction funding from the federal government in the future.

The major challenge faced by AHA is the age of the majority of its buildings. As seen in the previous table, most (73.1%) of the housing structures were built in the 1960’s and 1970’s, and the heating systems, distribution systems, and exterior brickwork have suffered. A major rehabilitation will take place soon at the Cumberland Gardens development. Several needs have been identified by 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.

Resident Participation

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 AHA Executive Director.

2. NOT APPLICABLE. AHA is not designated as a troubled agency by HUD.

Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Program Year 1 Action Plan Barriers to Affordable Housing response:

1. Proposed Actions to Remove Barriers to Affordable Housing

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.

The City is proud of the inclusive nature of its zoning ordinance and does not believe that it impacts negatively upon the ability to develop, maintain, or improve affordable housing.

The City has six codes that address the issue of the health and safety of residential units. Four of the six are based on national standards developed the Building Officials and Code Administrators International (BOCA): building, plumbing, electrical, and fire prevention. In addition, the property rehabilitation and maintenance code and a portion of the City's health code impact the health and safety of residential units, and also are adapted from State and national standards. Since the six codes have been developed in compliance with State and national standards, it seems reasonable to conclude that they do not have a negative impact on the ability to develop, maintain, or improve affordable housing.

By administrative policy, fees are charged for permits or licenses to the extent necessary to recoup the costs of administering and enforcing the various codes. Therefore, fees and charges do not have a negative impact on the ability to develop, maintain, or improve affordable housing.

Strategy to Remove or Ameliorate Negative Effects of Public Policies

As indicated above, overall, the policies and ordinances governing the City of Allentown do not have an adverse effect on the ability to develop, maintain, or improve affordable housing. Aside from the tax policies over which the City has little control, Allentown has developed policies and procedures that generally support the development of affordable housing.

HOMELESS

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction’s plan for the investment and use of funds directed toward homelessness.
2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.
3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.
4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.
5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

Program Year 1 Action Plan Special Needs response:

1. Source of Funds

Homeless needs and homeless prevention are addressed through CDBG and ESG funds. The City of Allentown will continue to support efforts of human service agencies, social service providers, and other organizations that provide services and assistance to individuals and families who are at imminent risk of becoming homeless.

In addition to the funds the City plans to allocate towards homeless needs and homeless prevention activities, several of the nonprofit social and human service agencies that provide services to the homeless and those at risk of becoming homeless receive public and private funds including grant funds through the U.S. Department of Health and Human Services, McKinney-Vento Homeless Assistance Act funds, and other sources. These funds are used to operate other emergency shelters, transitional housing facilities, and permanent supportive housing facilities throughout the City of Allentown. These funds are also used to provide supportive services such as case management services, counseling, job training, and life skills classes.

There are several nonprofit homeless services providers in Allentown. The City tries to distribute CDBG and ESG funds equitably to eligible organizations. The list below describes the funding available for some of these:

- Allentown Rescue Mission (**\$29,000**)
- Salvation Army – Allentown PA (**\$29,000**)
- Lehigh County Conference of Churches (**\$29,000**)
- Community Action Committee of the Lehigh Valley – Sixth Street Shelter (**\$29,000**)

2. Homeless Needs

The Housing Inventory Chart for the Allentown/Northeast PA Continuum of Care is provided below. It provides data on the number of beds currently located in the region ready to meet the needs of homeless persons and families. A total of 1,252 beds exist in the region, including temporary shelter, longer-term transitional ones, and permanent housing with supportive services. The majority (40.8%) of the available units are categorized as transitional, most of which are reserved for families with children.

Facility Type	# of Facilities	Family Units	Family Beds	Individual Beds	Chronic Homeless	Total Beds
Emergency Shelter	21	61	231	222	0	453
Transitional Housing	23	131	396	115	0	511
Permanent Supportive Housing	16	39	98	190	48	288
Total	60	231	725	527	48	1,252

Source: 2009 Continuum of Care

The Housing Inventory Chart of Allentown/Northeast PA’s Unmet Needs is provided below. Although there are currently over 1,200 year-round beds available for the homeless in the region, there is still not enough housing to meet needs. Based on this table, an additional 135 permanent supportive housing beds are needed to meet the needs of the homeless population in the Northeast PA region. For homeless individuals, 55 beds of permanent supportive housing are needed; for homeless families, the need includes 80 permanent supportive housing beds and 32 permanent supportive housing units. Allentown recognizes the magnitude of the need for additional homeless facilities and will continue to support the efforts of the CoC.

	All Year-Round Beds/Units			
	Beds for HHs w/ Children	Units for HHs w/ Children	Beds for HHs w/o Children	Total Year-Round Beds
Emergency Shelter				
	0	0	0	0
Transitional Housing				
	0	0	0	0
Safe Haven				
	0	0	0	0
Permanent Supportive Housing				
	80	32	55	135
TOTALS	80	32	55	135

Source: 2009 Continuum of Care

3. Chronic Homelessness

In recent years, the U.S. Congress has encouraged the development of permanent supportive housing for homeless people, especially for the chronically homeless population, a substantial number of whom are mentally ill. Concurrently, there has been a shift towards committing a greater proportion of federal funds toward “housing first” which demands less from the individual to remain in the housing.

HUD defines the term “chronically homeless” as unaccompanied individuals with disabilities who have been continually homeless for 12 months or more or who have had four episodes of homelessness in a three-year period. In the Northeast PA region, 57 people were identified as chronically homeless in 2009. Of those 57 individuals, 25 were receiving shelter services within the Lehigh County system, but the majority of the chronically homeless (32) were unsheltered.

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 and the lack of intensive support services due to lack of funding are being addressed by the Allentown/Northeast PA CoC process. Funding emphasis is now on additional permanent housing units. The need for a central recovery drop-in center for unsheltered homeless is also being addressed, as is the decentralized system of overnight shelters in the winter that have helped bring in additional people off the streets. In addition, there are nonprofit-led homeless outreach teams that work with local police departments to identify and shelter the street homeless. The Veterans Administration, an active member of the CoC, also has mobile workers who conduct outreach in shelters and on the streets.

The Lehigh County Conference of Churches’ 2005 study, cited above, focused on the chronically homeless in Allentown. The chronically homeless interviewed were found to be predominately white, male, divorced or never married, and had either a substance use disorder or mental illness. The majority of men in this population reported some sort of legal involvement and frequently reported histories of child abuse. Smaller numbers of the chronically homeless were women who also had a mental illness, substance use disorder, or both. The women had histories of victimization through domestic abuse, sexual assault, or childhood abuse.

It was found that the chronically homeless individuals infrequently used public shelters and other transitional housing programs, viewing them as uncaring, rigid, and non-beneficial. Common themes and experiences identified by the interviewees included, among others:

- childhood abuse and neglect;
- frequent relocation;
- parental substance abuse;
- placement outside the home;
- substance abuse;
- criminal activity;
- military experience;
- difficulty navigating the system;

- avoidance of shelters; and
- barriers to housing.

The **Allentown Plan To End Chronic Homelessness by 2017** cites the following facts about the chronic homeless in and around the City of Allentown.

- In 2005, 189 chronically homeless persons were identified over a two-year period in Allentown.
- As of January 2007, a total of 48 persons were living in nine homeless encampments in the City under bridges and wooded, out of the way places. Many were located on private property, and “permanent” structures had been built on two sites.
- There was a lack of coordinated services in Allentown designed to address the multitude of needs for persons who are chronically homeless.

The 2009 Point-in-Time Survey categorized the people interviewed into subpopulations as follows:

Allentown/Northeast PA Continuum of Care Homeless Subpopulations, Point-In-Time Survey				
	Sheltered	Unsheltered	Total	% of Pop.*
Chronically Homeless	25	32	57	17.6%
Severely Mentally Ill	39	9	48	14.9%
Chronic Substance Abuse	73	14	87	26.9%
Veterans	29	3	32	9.9%
Persons with HIV/AIDS	0	0	0	0.0%
Victims of Domestic Violence	95	0	95	29.4%
Unaccompanied Youth Under 18 y	4	0	4	1.2%
Total	265	58	323	
* Percentage may not add up to 100%, as individuals may check more than one condition				
Source: 2009 Continuum of Care				

As the chart illustrates, the chronically homeless accounted for more than one-sixth of those interviewed.

4. Homelessness Prevention and Outreach

There are many social service agencies in Allentown and throughout the Northeast PA RHAB 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 Rescue Mission;
- Community Action Committee of Lehigh Valley;
- Halfway Home of the Lehigh Valley;
- Haven House;
- Lehigh County Conference of Churches;
- Lehigh Valley Center for Independent Living;
- Transitional Living Center of Lehigh Valley Hospital; and
- Turning Point of the Lehigh Valley.

These organizations provide 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.

5. Discharge Coordination Policy

Foster Care Discharge Policy

The Prevention Subcommittee of the Allentown/Northeast PA Continuum of Care Steering Committee (which includes a representative from the CoC) is assisting DCED in the development of a universal discharge tool to be used for youth exiting foster care. The committee expects to have the protocol in place in 2011. It will include information such as where the youth anticipates living following discharge, the cost of housing, and the source of income, as well as two contingency plans. The planning tool will also verify that youth have legal documentation in order to obtain housing (a birth certificate, social security card, and state ID). Currently, one member of the CoC provides case management and independent living services (funded through the Chafee Act) for foster care youth within the CoC to prepare them for a successful transition from care.

Health Care Discharge

Hospitals in Pennsylvania must have written discharge policies for appropriate referral and transfer plans that comply with Pennsylvania Code (028 Section 105). Further, the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) requirements prohibit the release of individuals without a discharge plan that includes having a place to live. To provide further assistance in finding appropriate accommodations for persons with disabilities, the Commonwealth's Ten Year Plan to End Homelessness calls for increased use of SOAR (SSI/SSDI Outreach, Access, and Recovery Program). SOAR allows users to explore various accommodation options for people with disabilities. The system is currently in use in Lehigh and Allegheny Counties, and Philadelphia.

Mental Health Discharge

The Commonwealth of Pennsylvania has a formal policy that no discharge from a state hospital can occur unless all housing, treatment, case management, and rehabilitation services are in place at the county level. The Pennsylvania Department of Public Welfare/Office of Mental Health and Substance Abuse Services (OMHSAS) sets this policy. In 2006, the Housing Work Group of the Adult Advisory Committee of the OMHSAS unveiled the *Plan for Promoting Housing and Recovery-Oriented Services*. The Housing Work Group offered the following philosophy:

“Stable housing is an essential component of mental health recovery. People with serious mental illness and co-occurring disorders must have access to a comprehensive array of permanent, affordable, barrier free housing options as well as the supports necessary for them to obtain and maintain the housing of their choice.”

Correctional Institution Discharge

The Commonwealth of Pennsylvania has a formal policy that no individual may be discharged from a State Correctional Institution without an approved Home Plan. It requires the continuity of care planners in each institution make every effort to assure a viable home plan and follow-up services for all who will be released. In order to expedite re-entry, the PA Department of Corrections (DOC) issued a policy statement on Inmate Reentry and Transition on January 5, 2006. This policy includes providing each inmate being released from a State Correctional Institution with written information on housing, a photo ID, and other personal documents. Regional efforts which bring life to the guiding vision and policy of the Dept. of Corrections include:

SPORE (Special Program for Offenders in Rehabilitation and Education): Identifies persons with a serious mental illness involved in the criminal justice system; provides advocacy, accountability, and assistance thereby leading the person to a greater degree of health, responsibility, proficiency, and quality of life.

MISA (Mental Illness/Substance Abuse): Inmates of Lehigh County Prison with an identified psychiatric disorder are assessed for secondary drug and/or alcohol abuse issues as part of their initial evaluation. Treatment services are provided and wrap around to community-based providers. Recovery tools are provided that may help inmates learn to stay clean and sober and housed upon discharge.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Program Year 1 Action Plan ESG response:

NOT APPLICABLE.

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.

2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Program Year 1 Action Plan Community Development response:

1. Priority Non-Housing Community Development Needs

The City of Allentown’s non-housing community development needs reflect the City’s goals of enhancing the economic environment, upgrading the public infrastructure and public facilities, and supporting public service efforts. CDBG resources will be directed towards efforts in neighborhoods in the Focus Area that will enhance economic development, streetscapes, and recreational infrastructure and programming.

2. Specific Short-Term and Long-Term Objectives

The City of Allentown has identified the following non-housing priority objectives and strategies over the next five years:

Economic Development & Job Creation

The City has been actively working to enhance its economic base and increase economic opportunities for its residents, via a number of economic development efforts. These efforts will be primarily concentrated on the Focus Area or on activities that are accessible to residents of the Focus Area.

Long-Term Goals: The City of Allentown will continue to facilitate developments in the community that create a more diverse and broad-based economy that adds jobs to the area and results in an upgrade of the environment. In particular, the City aims to support the local economy and small businesses through streetscape and façade improvements, small business loans, and job training programs.

Short-Term Objectives and Strategies:

1. *Increase employment opportunities in the City, with special attention to strengthening the commercial/industrial base in the Focus Area and making it accessible to residents in the Focus Area*
 - Assist existing firms within the Focus Area by following up on identified needs and initiating problem-solving activities
 - Encourage entrepreneurship of residents of the Focus Area by reducing the costs of suitable office space, obtaining financing, and providing technical assistance
 - Undertake infrastructure improvements that will promote commercial/industrial development within the Focus Area

- Encourage small businesses located within the Focus Area to participate in existing loan programs, and create new loan programs to fill the gaps in available financing
 - Support employers' efforts to hire and train residents of the Focus Area
 - Provide direct loan assistance to for-profit businesses to retain existing jobs and create new jobs
 - Assemble sites in support of commercial and industrial development and expansion initiatives that result in the creation of jobs; pursue HUD Section 108 loan guarantees, as appropriate to stimulate private investment
 - Package employment incentives such as tax credits, on-the-job and customized job training to attract businesses to the Focus Area
2. *Assist in the revitalization of the central business district*
- Support the assembly of sites for the on-going development of Class A multi-user office space and new corporate headquarters within the central business district
 - Support existing retail stores in the central business district that attract customers from throughout the region, and attract other specialty retailers
 - Recruit additional restaurants to the central business district and support the expansion of cultural and entertainment activities downtown
 - Encourage the utilization of currently-vacant upper floor space within the central business district
 - Encourage the restoration and rehabilitation of older store fronts within the central business district
 - Assure the provision of adequate parking within the central business district to support existing and proposed office development, retail shopping, cultural and entertainment activities, and residential development
3. *Facilitate the adaptation and re-use of existing vacant and under-utilized land and buildings within the Focus Area*
- Inform owners of vacant and under-utilized properties located within the Focus Area of the available programs to redevelop/reuse these sites, as well as their current market potential
 - Provide financial and other inducements that promote the modernization of older industrial structures within the Focus Area
 - Seek financial assistance for infrastructure development within the Focus Area when unique problems create extraordinary burdens in terms of cost of development
 - Facilitate the clearing of structures within the Focus Area to create development opportunities when the cost of modernization of the existing structures is not feasible
 - Initiate programs to overcome special burdens of environmental clean-up of otherwise suitable industrial sites within the Focus Area
 - Review City zoning, building, and fire protection ordinances to ensure they do not unduly restrict the use and design of older structures and their processes are executed in a timely and orderly manner
 - For larger industrial building modernization and expansion projects located in the Focus Area, work with neighborhood groups in the area to create

- forums for communicating improvement plans between the firms and the neighborhoods
 - Consider commercial, residential and institutional alternative uses which are neighborhood compatible for obsolete industrial structures within the Focus Area
4. *Increase the educational preparedness and level of skills necessary for entrance employment opportunities for residents of the Focus Area*
- Assess the skills needed by businesses located throughout the region
 - Assess the accessibility and availability of basic skills and vocational training opportunities for Focus Area residents
 - Assist basic skills providers and educational institutions in meeting the needs of Focus Area residents
 - Promote and coordinate community based organizations and State Employment Center programs that identify available human resources and match employment skills to employer requirements
5. *Strengthen Focus Area retail and service areas*
- Examine the services and space available within existing neighborhood business areas within the Focus Area
 - Work with neighborhood groups to identify the service needs of Focus Area residents
 - Recruit businesses for the neighborhood business areas within the Focus Area by providing financial, location and technical assistance
6. *Facilitate Focus Area residents' ability to access jobs by removing impediments*
- Work with LANTA in adjusting bus routes and hours of operation to improve the accessibility of area employment centers to Focus Area residents
 - Work with employers and dependent care providers to improve the accessibility and affordability of child care/elder care throughout the City
7. *Enhance transportation and utility infrastructure to better serve existing business and attract new types of businesses and industries*
- Improve transportation infrastructure in the City, particularly in the Focus Area, to attract new and diverse businesses and spur job creation
 - Explore the potential for utility infrastructure upgrades, such as Wi-Fi hubs or fiber optic lines, to attract hi-tech businesses and industry to the central business district

Community Recreational/Educational Programming & Facilities

The City of Allentown has been working to link public facility improvements to the overall economic development efforts of the City. Efforts include improving and increasing the number of public green spaces and/or city parks within the neighborhoods surrounding the downtown and making physical improvements to the existing streetscapes.

Long-Term Goals: The City of Allentown will continue to improve community spaces in the city, including community centers, parks, and streetscape efforts to enhance the natural and built environment.

Short-Term Objectives and Strategies:

1. *Enhance utilization of existing public/quasi-public facilities for neighborhood activities*
 - Conduct an inventory of facilities suitable for neighborhood activities, starting in the Focus Area
 - Discuss the availability of each facility with its owner
 - Assess the service needs of each neighborhood that could be addressed through enhanced utilization of existing facilities, using the Parks and Recreation Master Plan and other plans as a starting point
 - Work with community groups, facility owners and service providers to develop a schedule of activities for each neighborhood's facilities

2. *Properly maintain and improve the condition of publicly-owned facilities*
 - Work with other government agencies to assess the condition of public facilities, starting in the Focus Area, and to prepare a cost estimate to renovate the facilities taking into consideration their expanded use
 - Apply for federal, state, and private grants to partially fund the renovation of City-owned facilities
 - Upgrade City-owned facilities through regular allocations from the Capital Budget
 - Encourage other government entities to apply for federal, state and private grants to partially fund the renovations
 - Encourage neighborhood groups to assist in maintenance and improvement efforts

3. *Increase the number of and access to recreational/educational program opportunities within the Focus Area*
 - Examine the recreation/education needs of citizens living in the Focus Area
 - Work with recreation/education service providers to offer desired services
 - Support the provision of recreational/educational programs within the Focus Area, whenever possible
 - Support the provision of convenient transportation to the desired activities when services cannot be provided within the Focus Area
 - 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

Infrastructure

The City of Allentown has a number of infrastructure improvements planned that will assist in the revitalization of the community, particularly revitalization of the Focus Area.

Long-Term Goals: Ongoing infrastructure improvements to support the overall economic development and housing efforts will include streets, sidewalks, sewers, storm water, and any additional infrastructure needed to enhance Allentown’s infrastructure in the Focus Area.

Short-Term Objectives and Strategies:

1. *Pursue infrastructure improvements that will promote commercial/industrial development within the Focus Area*
 - support the assembly of adjacent sites for the on-going development of office space and new corporate headquarters within the central business district, or industrial
 - require property owners to replace curb and sidewalk when they are in violation of the City Code, in areas where systematic code enforcement inspections are being conducted
2. *Pursue infrastructure improvements in residential neighborhoods that encourage multi-modal transportation options and offer residents the ability to choose*
 - work with LANTA in adjusting bus routes and hours of operation to improve the accessibility of area employment and entertainment centers to Focus Area residents
 - explore the feasibility of alternative transportation systems, such as sharrows (road lanes shared by cars and bikes) and separated bike networks
 - support the installation of signage for alternative transportation networks for residents and way-finding signage for tourists and visitors
3. *Ensure that industrial properties slated for redevelopment/rehabilitation into other uses have the necessary utilities to support these potential uses*
 - obtain financial assistance for infrastructure development within the Focus Area when unique problems create extraordinary burdens in terms of cost development
 - establish a land bank of vacant/under-utilized properties and create a priority list for improvement/development of these properties predicated upon their marketability

Livability

The City of Allentown will continue its efforts to preserve and improve the quality of life in its communities, while promoting civic and neighborhood pride.

Long-Term Goals: Encourage the revitalization of downtown Allentown, particularly the Focus Area, through increased homeownership opportunities, improvement of existing infrastructure, and increased engagement with neighborhood groups and residents.

Short-Term Objectives and Strategies:

1. *Increase cleanliness and a sense of well-being in the City's neighborhoods*

- Locate trash cans in the public right-of-way in the Focus Area, wherever practical
 - Promote neighborhood clean-up efforts City-wide
 - Support programs that recognize individual or neighborhood efforts to maintain or improve appearance of neighborhoods
 - Develop programs to facilitate the revitalization of vacant, boarded, and/or deteriorated properties
2. *Increase the percentage of homeownership in the focus and rehabilitation areas*
- Offer incentives to encourage potential homeowners to buy properties in the Focus Area
 - Develop new programs that encourage homeownership
 - Provide rehabilitation loans for code corrective work to homeowners residing in the Focus Area
3. *Decrease the housing density within the Focus Area*
- Encourage the deconversion of multi-family structures in overcrowded Focus Area neighborhoods, especially where the original floor plans were single-family homes
 - Selectively demolish condemned and deteriorated properties in the Focus Area for which no feasible reuse may be found
4. *Support existing neighborhood groups and promote the development of new community organizations throughout the City*
- Coordinate City services to complement the efforts of neighborhood groups and residents, especially in the Focus Area
 - Strengthen the relationships among neighborhood groups, community institutions, businesses, government, and residents, especially in the Focus Area
 - Work with interested community groups City-wide to develop neighborhood improvement plans
5. *Increase the supply of parking in the Focus and Rehabilitation Areas*
- Create neighborhood parking lots throughout the Focus Area
 - Work with LANTA in adjusting bus routes and hours of operation to better meet the needs of potential riders in the focus and rehabilitation areas, thereby reducing residents' dependence on automobiles
6. *Promote the architectural and cultural resources that exist in many City neighborhoods*
- Work with cultural organizations to develop additional programs aimed at encouraging people to take advantage of the City's many cultural resources, including theaters, museums, restaurants, and ethnic events
 - Work with community organizations to promote the benefits of preserving, reusing, and restoring the City's architecturally and historically significant buildings, sites, and neighborhoods

- Offer incentives for restoration or historically sensitive rehabilitation and reuse of properties in the City's historic and architecturally significant areas
 - Offer grants for the difference between the amount required to meet the Secretary of the Interior Standards for Rehabilitation and that necessary for basic housing rehabilitation to households who qualify for housing rehabilitation loans residing in districts eligible for the National Register of Historic Places
7. *Enhance the appearance of Allentown's neighborhoods through proper design of public spaces*
- Plant trees and support other activities which improve the landscape and streetscape in previous and current systematic code enforcement inspection areas
 - Enhance the coordination of defined neighborhood objectives and infrastructure planning and design

Public Safety

The City of Allentown will continue to improve public safety for residents and visitors of Allentown through increased business activity and increased attention to existing public safety measures, particularly in the Focus Area. The City also plans to implement plans and objectives developed under the Weed & Seed Program, and work with neighborhood groups to reduce crime.

Long-Term Goals: Promote ongoing efforts to make downtown Allentown, particularly the Focus Area, more attractive and accessible to residents and visitors through crime reduction and prevention.

Short-Term Objectives and Strategies:

1. *Create safe and secure residential neighborhoods and commercial districts*
 - Encourage neighborhood policing by citizen groups and promote coordination between citizen groups and law enforcement
 - Support more non-office/non-institutional uses downtown as a way to encourage an active nightlife and after-hours activities that will have the ancillary effect of reducing crime
 - Target crime reduction and prevention programs to downtown Allentown and the Central Business District to attract residents after-hours
 - Implement plans and objectives associated with the Allentown's Weed and Seed Program related to crime reduction
2. *Enforce existing safety codes for areas in public rights-of-way and in residential neighborhoods*
 - Develop a coordinated approach to strengthen and strongly enforce the City's ordinances regarding litter, graffiti, loud music, and loitering
 - Require property owners to replace curbs and sidewalks when they are in violation of the City Code, in areas where systematic code enforcement inspections are being conducted

- Enforce the disruptive conduct provision of the Rental Unit Inspection Program
- Hold landlords accountable for tenant safety, and foster dialogue between the City, landlords, and tenants to identify areas for safety improvement

Antipoverty Strategy

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Program Year 1 Action Plan Antipoverty Strategy response:

1. Actions to Reduce the Number of Poverty Level Families

In 2000, 18.5% of Allentown residents lived in poverty; however, 11 of the 15 census tracts contained whole or partially within the Focus Area had poverty levels exceeding that of the City. The American Community Survey estimates that in 2008, 20.4% of Allentown residents were living in poverty, an increase of 3,471 individuals.

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. This philosophy is reflected throughout the Consolidated Plan and the programs that will be implemented by the City.

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 short-term transitional housing programs. 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 adults, the City funds a literacy program and English as a second language (ESL) classes. 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. However, it is possible 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.

2. Estimated Reduction in the Number of Poverty-Level Families

Poverty is a function of income. Factors that affect income include education, job training, and employment. The City of Allentown, by itself, has very little control over the factors that cause poverty. Such factors include unemployment, substance abuse issues, and lack of transportation options to get to and from work, to name a few.

While the City has little control over the overall factors that cause poverty, the City elects to support data-measured organizations that provide quality services to low income residents to help them improve their incomes. For example, the City of Allentown, in partnership with nonprofit organizations and businesses, can influence the chances for poverty-stricken residents of moving up and out of poverty. The City can achieve this by supporting organizations that offer job training and placement services as well as drug and alcohol abuse counseling services. In addition, the City can help to reduce the number of residents living in poverty by advocating for increased public transit options within the greater Lehigh Valley region to low income areas, including extended service hours on the evenings and weekends and the addition of new or alternate routes.

Ultimately, federal and state policies on welfare, health care, and the minimum wage are crucial factors in the fight to address and reduce poverty. The City will continue to provide incentives for businesses to locate in low income areas, to advocate for improved transportation alternatives, to support organizations that provide job training and placement services, to support homeless prevention activities, and to preserve and improve affordable housing options, as part of its strategy to prevent and alleviate poverty in Allentown.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 1 Action Plan Specific Objectives response:

1. Priorities and Objectives

The priorities and objectives identified below are not presented in order of preference. They are grouped by type of activity and are based on information obtained from housing and social service providers.

Priorities for the Elderly/Frail Elderly Populations

- Continue to support activities that provide affordable housing for elderly and frail elderly residents at or below 80% of area median income.
- Continue to support activities that provide the elderly and frail elderly with benefits counseling, care coordination, transportation, and other services.

Through its funding of public service and public facility activities, the City will support the efforts of organizations that seek to develop affordable housing for the elderly and frail elderly, as well as those organizations that provide services to the elderly and frail elderly.

Priorities for Persons with Mental Illness

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

The City of Allentown will aid the efforts of area organizations that provide supportive services and housing options to persons with mental illness.

Priorities for Persons with Disabilities

- Provide tenant-based rental assistance subsidies to individuals and families who have disabilities and are in danger of becoming homeless.
- Provide financing to disabled individuals to rehabilitate housing units for accessibility.
- Continue to support activities that serve persons with disabilities.

The City will aid the efforts of area organizations that provide supportive services and housing options to disabled persons.

Priorities for Persons with Alcohol and Drug Addiction

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

The City of Allentown will offer assistance to local agencies providing outreach services to individuals with drug and alcohol problems. Furthermore, the City will maintain dialogue with area service providers and nonprofit organizations to evaluate the feasibility of developing additional transitional and supportive permanent housing for people with substance abuse issues.

Priorities for Persons with HIV/AIDS

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

Through various federal funding sources, the City of Allentown will support area organizations that provide supportive services and affordable housing options for people living with HIV/AIDS. This includes the Lehigh County Conference of Churches. The needs of these populations are discussed in more detail above.

2. Resources Expected to be Available

The City anticipates receiving \$3,244,529 in CDBG funds, \$1,276,366 in HOME funds, and \$121,038 in ESG funds in FY2010. In addition, the City has reprogrammed \$1,176,043 from previous years' program grants for FY2010. These funding sources will be available to help support public improvements, the delivery of social services, affordable housing projects, housing rehabilitation programs, and homeless outreach and prevention activities.

It is increasingly difficult for the City of Allentown to fund non-homeless special needs projects, due to the limited amount of funding the City receives annually to support housing and community development initiatives, a growing homeless population, and the increasing amount of basic community needs resulting from current economic conditions. However, other resources are available on the federal, state, and local levels that area organizations can solicit to help provide affordable housing opportunities and supportive services to Allentown's non-homeless special needs populations.

There are several resources available to support non-homeless special needs housing initiatives. At the federal level, this includes HUD Section 202 housing funds (elderly projects), HUD Section 811 housing funds (housing for people with disabilities), Section 8 tenant and project based rental assistance, Hope VI funds, the Federal Home Loan Bank's Affordable Housing Program, Low Income Housing Tax Credits (LIHTC), Federal Home Loan Bank funds, public housing funds, HOPWA and ESG funds, and other resources.

The City will continue to support the efforts of local and regional organizations that provide housing and supportive services to non-homeless special needs individuals in Allentown.

Housing Opportunities for People with AIDS

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.
2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.
3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.
4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.
6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.
7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.
8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.
9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Program Year 1 Action Plan HOPWA response:

NOT APPLICABLE.

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

Program Year 1 Specific HOPWA Objectives response:

NOT APPLICABLE.

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.