

City of Allentown

2024

Draft Action Plan

DRAFT

Executive Summary

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

1. Introduction

The City of Allentown, Pennsylvania is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program, Emergency Solutions Grant, and HOME Investment Partnerships Program. The Fiscal Year 2024 Annual Action Plan represents the fifth year of the City of Allentown's Consolidated Plan for the Fiscal Years 2020-2024 as ratified by the City Council and approved by HUD. The Action Plan is the City's application for HUD entitlement grants which identifies the proposed programs and projects to be funded. The three primary HUD entitlement grants:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships Program (HOME)
- Emergency Solutions Grant (ESG)
- Historically, the City of Allentown has received HOPWA funding which was passed through to the Commonwealth of Pennsylvania for distribution. However, HOPWA funding was not received by the City of Allentown in 2024.

In compliance with HUD regulations, the City must annually prepare an Annual Action Plan to address how the City will use CDBG, ESG, and HOME funds to address its affordable housing, community, and economic development needs identified in the FY 2020-2024 Five Year Consolidated Plan. The City's FY 2024 Annual Action Plan, the fifth Annual Action Plan under the City's Five-Year Consolidated Plan, outlines which activities the City will undertake during the program year. The Consolidated Plan allows the City to continue to receive federal housing and community development funds as a direct Entitlement from HUD. The City's DCED will administer the community development programs for the CDBG, ESG and HOME Programs.

The Annual Action Plan is a collaborative effort of the City, Lehigh County, the community at large, social service agencies, housing providers, community development agencies, and economic development groups. The planning process was accomplished through a series of public meetings, funding requests, statistical data, and review of the City of Allentown's Comprehensive Plan and other community plans. The Grants Department within the Department of Community and Economic Development is the administering agency of the CDBG, ESG, and HOME programs.

The Annual Action Plan being submitted, covers the period of January 1, 2024, through December 31, 2024, which is the fifth installment for the Consolidated Plan, and presents the activities being funded to address the strategies outlined. The funds are intended to provide low- and moderate-income households with viable communities by addressing one of HUD's three objectives:

Provide affordable accessible housing, Create a suitable living environment, or Create economic growth opportunities.

Eligible activities include community facilities and improvements, roads and infrastructure, housing rehabilitation and preservation, development activities, public services, economic development, planning, and administration. Program outcomes are designed to show how each activity benefits the community or people served. All activities must provide one of the following benefits: Improved availability and accessibility to housing, Improved affordability of housing/rental stock, or Improved sustainability.

CDBG funds to address the needs outlined in this Plan are a **\$2,380,753.00**, HOME funds are **\$978,816.00**, ESG funds are **\$ 202,362.00**. HOPWA funds were not received for this funding round.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

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The vision of the Five-Year Consolidated Plan is to serve as a consolidated planning document, an application, and a strategic plan for the City of Allentown. The following goals and outcomes were identified for the five-year period of FY 2020 through FY 2024:

Housing Needs:

- To maintain and improve the condition of the housing stock to meet or exceed current code standards.
- To make available affordable homeownership, within the existing housing stock.
- To support the provision of adequate, safe, and affordable rental housing within the City of Allentown and on a regional basis; and
- To participate in a regional effort to make available a full array of permanent housing opportunities for special needs populations, to contribute to meeting the shelter and service needs of homeless residents of the city and to assist residents of the city in imminent danger of becoming homeless.

Homeless Needs:

- To support prevention strategies that address the root causes of chronic homelessness through the provision of tenant education; rental assistance; job/vocational training; employment services.
- To support intervention strategies that include the closure of homeless camps, when possible, and addressing the gaps and barriers in the service delivery system; and
- To support infrastructure strategies that include advocating for services, programs, and policies at the local, state, and national levels that enable chronically homeless persons to live as independently as possible.

Community Development Needs:

- Revitalizing Allentown's economy through vocational/educational training of City of Allentown residents, small business loans, and promotion of new activities city wide.
- Upgrading infrastructure in downtown Allentown through the rehabilitation of public infrastructure including streets, sidewalks, parks, and other facilities, to attract businesses and residents; and
- Improve neighborhoods by rehabilitating the existing housing stock and creating homeownership and rental housing opportunities.
- Non-Homeless Special Needs:

Elderly and Frail:

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

Mental Illness:

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

Disabled:

- Continue to support activities and services that support persons with disabilities.

Drug and Alcohol Addiction:

- Continue to offer support to local agencies that provide outreach programs to individuals struggling with drug and alcohol use; and

- Increase the supply of transitional and permanent supportive housing for individuals with drug and alcohol addiction.

HIV/AIDS:

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

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City of Allentown is continuously monitoring and evaluating the performance of its HUD entitlement programs while ensuring regulatory compliance.

The City of Allentown recognizes that the evaluation of past performance is critical to ensuring that the City of Allentown and its subrecipients are implementing funded activities efficiently and that those activities align with the City of Allentown's overall strategies and goals. The City of Allentown considers certain performance indicators in its evaluation of project proposals and tracks the performance history of subrecipients. In addition, the City of Allentown is currently looking to implement a grants software, an online portal that leverages customer relationship management technology to streamline the grants process and is utilized by Grants Department staff, City of Allentown staff, as well as subrecipients. The portal supports improved subrecipient performance, program compliance management, from the initial phases of Request for Qualifications and Proposals, award processes, and project management to the benefit of all involved.

The City of Allentown prepared a Consolidated Annual Performance and Evaluation Report (CAPER) for calendar year 2023. This CAPER was the fourth of the five-year period and reported the calendar year 2023 accomplishments of Allentown's CDBG, HOME and ESG Programs.

In 2023 the CDBG funds were spent on a variety of activities in the following categories, including Housing Rehabilitation, Public Infrastructure and Public Facilities, Acquisition of Substandard Properties, Code Enforcement, Demolition, Hazard Elimination, Direct Homeownership Assistance, Planning and Administration, and Public Services.

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

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

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

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

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

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

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

Public meetings will be held on June 17, 2024 at 5:00 pm and June 18, 2024 at 10:00 am to review this document in its draft form and solicit feedback from the community. The hearings will held in City Council Chambers, City Hall, 435 Hamilton Street, Allentown, PA.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

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

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

7. Summary

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

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

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

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PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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

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

Table 1 – Responsible Agencies

Narrative (optional)

The City of Allentown’s Department of Community and Economic Development (CED) is the administrating agency for the CDBG, ESG, and HOME programs. The Grants Department within the Department of Community and Economic Development prepares the Five-Year Consolidated Plan, Annual Action Plans, Environmental Review Records (ERR’s), Consolidated Annual Performance Evaluation Reports (CAPER), and is responsible for the monitoring, processing requests for payment, contracting, and oversight of the programs on a day-to-day basis. In addition, the City of Allentown has a private planning consulting firm available to assist the Grants Department on an as needed basis.

Historically, the City of Allentown has received HOPWA funding which was passed through to the Commonwealth of Pennsylvania for distribution. However, HOPWA funding was not received by the City of Allentown in 2024.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

In 2024, the City plans on reaching out to different organizations that will assist in completing the consolidated plan goals. The department has done outreach in the community, to educate organizations about the grant opportunities that may be available. Our Grant webinar will continue to be on the city website and shared as appropriate. Grant Compliance Staff will provide technical assistance as needed, to ensure new and existing organizations program success.

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

The City is the conduit of information and point of connection among and between the various stakeholder groups who contribute to planning efforts. The City affirmatively seeks to strengthen these joint efforts through information exchange, coordination of services and the facilitation of networking opportunities.

The city employs multiple Grant Compliance Administrators to assist in coordination between local organizations that serve Allentown residents which assists the City with identifying community needs. This includes Public and Assisted Housing Providers, Public Health, and Mental Health Service Agencies.

The Grant Compliance Administrators continue to meet with service agencies to bring more collaboration between public services and the City. Grant Compliance Staff also coordinate between public and assisted housing providers to make it easier accessible to the citizens of Allentown. Grant Compliance staff will continue to meet with public, private, and assisted housing providers.

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

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

Since 2005, the City of Allentown has participated in the regional CoC process led by the Allentown/Northeast PA Regional Homeless Advisory Board (RHAB). The Eastern PA CoC process is one of two regional efforts created to encompass non-entitlement portions of the state to receive homeless

assistance from HUD. Within the region, the Lehigh Valley RHAB encompasses Lehigh and Northampton Counties, the cities of Allentown, Bethlehem, and Easton.

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

The mission of the COC is to prevent and end homelessness in the Lehigh Valley, by preventing homelessness before it occurs, shortening the time people spend in homeless, provide households with access to safe, sustainable housing, and linkage to households to services and income opportunities.

As of 2024, The City of Allentown Grants Manager sits on the RHAB Governing Board to assist in the implementation and coordination of homeless services.

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

The COC facilitates how to allocate ESG funds, by demographic data, the RHAB completes a yearly PIT count, and requires all shelters to use HMIS. The COC meets quarterly to discuss the needs of the homeless population, which also helps how to allocate ESG funds. The City has a policies and procedures manual for ESG, which requires all recipients to submit quarterly reports, both written and HMIS reports. The Grant Compliance Staff assists ESG agencies that need training with HMIS and walks them through the process. The city also provides HMIS programming specifications.

In addition, the city works closely with the LV Regional Homeless Advisory Board (RHAB), which serves under the Eastern PA CoC. This includes attending quarterly meetings to discuss updates within the CoC, and assist unsheltered households as quickly as possible. The City also has a Homeless Commission, which includes members of the RHAB and Eastern PA CoC, to better address homelessness within the City of Allentown. To bridge the gap between homelessness and services, the City and the LV RHAB work in coordination to administer an ESG grant through the state of Pennsylvania. This includes Emergency Shelters, Street Outreach, Homeless Prevention Services and Rapid Rehousing Providers throughout Lehigh and Northampton counties.

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

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Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Greater Valley YMCA, Allentown Branch
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-homeless Services-Health
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	GV - YMCA provides services for youth, adults, and elderly, in the capacity of fitness and health. Educational services through Pre-K Counts Programming and Homelessness through emergency shelter.
2	Agency/Group/Organization	Boys & Girls Club of Allentown
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	BGCA provides after-school care for kids in the CCI Area. With their input the City feels they have a better understanding of the housing that many of the kids come from, ie homes with little food or unhealthy living conditions.
3	Agency/Group/Organization	COMMUNITY ACTION COMMITTEE OF THE LEHIGH VALLEY
	Agency/Group/Organization Type	Services - Housing Services-homeless

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Contributor through Upside Allentown - leader of projects in housing, economic development, public safety, physical enhancements, arts & culture, marketing, and education Run programming for housing counseling, homeless shelter, and entrepreneur training.
4	Agency/Group/Organization	ALLENTOWN RESCUE MISSION
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Needs - Veterans Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Men's shelter that regularly participates to share information about homeless population. Looking for more ways to provide more services.
5	Agency/Group/Organization	COMMUNITY BIKE WORKS
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Education
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization is very vocal and open to allowing City into their doors to get input from the kids who are part of after-school programming. Would like to make a significant change in our City and would like to expand into South Allentown - 2 present sites in CCI and on East-side.

6	Agency/Group/Organization	Allentown Housing Authority
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Housing Authority is currently building a new housing development at Lehigh Street and Martin Luther Drive. This will be rent and also affordable housing.
7	Agency/Group/Organization	Lehigh Conference of Churches
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Needs - Veterans Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency offers assistance for individuals with special needs and homeless. One of the few agencies that provides special needs services. Always available to share information. Looking to expand services at their site.
8	Agency/Group/Organization	The Salvation Army
	Agency/Group/Organization Type	Services-Children Services-homeless Services-Health Services-Education

	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization provides educational and recreational services to Allentown residents. Also includes their homeless shelter for women and children. Organization plays an important role in community and provides much needed resources.m
9	Agency/Group/Organization	Allentown Redevelopment Authority
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Allentown Redevelopment Authority is an arm of the city and it's currently being used to stop blight and do some redevelopment of homes to end blight in the city
10	Agency/Group/Organization	HABITAT FOR HUMANITY
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Habitat for Humanity of the Lehigh Valley has a successful history of providing safe, decent, affordable housing for hardworking, low to moderate income families while helping revitalize neighborhoods.
11	Agency/Group/Organization	City of Allentown
	Agency/Group/Organization Type	Other government - Local

<p>What section of the Plan was addressed by Consultation?</p>	<p>Economic Development</p>
<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The City of Allentown does various projects throughout the year. Parks and Recreation, Pedestrian Street Lighting, ADA Curb Cuts, Public Improvements. The grants department works directly partners with City Departments such as Streets, Public works, Parks, and other city entities. In partnership with such City departments and bureaus, the City in its entirety works to address flood prone areas, and the emergency management across the board for the departments. The City's Flood Plain Department is one of the 23,000 communities participating in the National Flood Insurance Program (NFIP), which is managed by the Federal Emergency Management Agency (FEMA). This program offers flood insurance to our community. The Lehigh Valley Hazard Mitigation Plan identified several potentially hazardous flood areas throughout the city of Allentown that threaten residents from all income categories. In addition, the City of Allentown IT Department underwent a broadband study to bring broadband services to Allentown residents. According to the data provided by the FCC, all residents have broadband available to them. However, it is not always affordable. The city has three service providers offering services, some now offering reduced rates for low to moderate income residents. The Allentown Vision 30 Plan recommends developing a city-wide resilience plan based on the finding of the LVHMP.</p>

Identify any Agency Types not consulted and provide rationale for not consulting

Not applicable.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Lehigh Valley Regional Homeless Advisory Board	City implements strategies discussed at LVRHAB and aligns goals to meet City of Allentown needs.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

Agencies above that responded to inquires were included. Many others responded by submitting proposals for funding. The City is also in the process of writing our Consolidated Plan - input for the Consolidated Plan is expansive. The City has offered open forums to discuss needs/wants for the City with agency leaders and beneficiaries. The City also provided an open forum to discuss Impediments to Fair Housing. The City is very fortunate to have input and knowledge available from agencies to discuss plans that were implementable and those that never came to fruition.

AP-12 Participation – 91.105, 91.200(c)

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

Citizen participation in the development of the Annual Action Plan for the period January 1, 2024 through December 31, 2024 was encouraged through participation in the public hearings, public meetings, and City Council review.

Public hearings were advertised in the local newspaper of general circulation, the Morning Call. Pursuant to public notifications, two public hearings were held on June 17, 2024 and June 18, 2024. Public hearings were held on the third floor of City Hall. Public meetings were duly advertised in the Morning Call, and online via the city’s website: www.allentownpa.gov

In addition, a copy of the action plan will be made available on the City of Allentown website.

City Council approved the final Action Plan on _____.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Hearing	Non-targeted/broad community				
2	Newspaper Ad	Non-targeted/broad community				

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Introduction to the 2024 Action Plan Annual Allocation

On May 7, 2024, the City of Allentown received the official allocation letter outlining the funding for the Program Year 2024. The allocations are crucial for the continued support and development of our community programs. The breakdown of the allocations is as follows:

- Community Development Block Grant (CDBG) \$2,380,753.00
- HOME Investment Partnerships Program (HOME) \$978,816.00
- Emergency Solutions Grants (ESG) \$202,362.00

These funds will enable us to further our mission in enhancing the quality of life for all residents by supporting affordable housing, community

development, and essential services.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,380,753	0	0	2,380,753	0	Funds are designated to benefit low-to-moderate-income residents in Allentown. The focus areas for these funds include Acquisition Administration and Planning Economic Development Housing Public Improvements Public Services Each category aims to improve the quality of life and provide essential support to the community's most vulnerable population

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	978,816	0	0	978,816	0	Funds are allocated to benefit low-to-moderate-income residents in Allentown across the following areas Acquisition Administration and Planning Economic Development Housing Public Improvements Public Services These allocations aim to enhance the quality of life and provide essential support to the community's most vulnerable populations

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	0	0	0	0	0	The City of Allentown was not granted HOPWA funds for FY2024.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	202,362	0	0	202,362	0	Funds are disbursed to benefit low-to-moderate-income residents in Allentown in the following areas Conversion and Rehabilitation for Transitional Housing Financial Assistance Overnight Shelter Rapid Re-housing (Rental Assistance) Rental Assistance Services Transitional Housing

Table 5 - Expected Resources – Priority Table

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

The federal Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds aim to create sustainable communities for low- and moderate-income households by ensuring access to quality housing, a suitable living environment, and increased economic opportunities. Eligible activities under these programs include the development of community facilities and infrastructure, housing rehabilitation and preservation, the creation of affordable housing, the provision of public services, economic development initiatives, as well as

planning and administrative functions. The City of Allentown will collaborate with other public agencies and nonprofit organizations when feasible to leverage resources and enhance program outcomes. Additionally, the City will continue to utilize a diverse array of state and local funding sources to complement and maximize the impact of CDBG funds.

The City of Allentown actively encourages private developers and non-profit organizations to engage in community revitalization initiatives, with a particular focus on the development of affordable housing. These groups are invited to utilize funding sources such as the Federal Home Loan Bank and the Low-Income Housing Tax Credit Program to supplement other resources in creating affordable housing for low-income and special needs populations. The City will continue to leverage funds from the Pennsylvania Housing Finance Agency, the Department of Community and Economic Development, and other relevant agencies to achieve its housing objectives.

While CDBG federal funds do not require matching contributions, the City of Allentown will leverage them with a diverse array of state and local funding sources. These funds support the creation of viable communities by ensuring access to decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities under this program include the development and improvement of community facilities, housing rehabilitation and preservation, affordable housing initiatives, public services, economic development, as well as planning and administration functions.

The HOME program's 25% match requirement is met through the Subrecipient's additional funding sources, which are disclosed in their application. The City of Allentown requires HOME grantees developing affordable rental housing to commit a 25% match to their projects. These groups may utilize funding sources such as the Federal Home Loan Bank and the Low-Income Housing Tax Credit Program to supplement other resources in developing affordable housing for low-income and special needs populations.

The Emergency Solutions Grant (ESG) program requires a 100% match. The City of Allentown mandates that subrecipients match the full amount of their grant awards. Subrecipients meet this requirement through various sources, including the Homeless Assistance Program (HAP - State), United Way (Local), Sylvia Perkins Trust (Local), County Housing Case Management (Local), Federal Emergency Management Agency (FEMA - Federal), Trexler Trust (Local), Provident Foundation (Local), Community Services Block Grant (CSBG - Federal), Community Development Block Grant (CDBG - Federal), Pennsylvania Continuum of Care (CoC - Federal), Post Foundation (Local), as well as through in-kind contributions and cash donations from local sources.

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

Not applicable – the city does not have any publicly owned land or property within its jurisdiction.

Discussion

The City regularly convenes with its community development partners and agencies to strategize and execute a range of revitalization initiatives within its boundaries. These efforts encompass projects funded through the federal allocations outlined in this plan, as well as activities supported by private entities.

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Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator

Table 6 – Goals Summary

Goal Descriptions

Goal Name	Goal Description
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Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Allentown uses its Community Development Block Grant (CDGB), Emergency Solutions Grant (ESG), HOME Investment Partnership Program (HOME) Grant and other available federal, state, and local funds to develop and preserve affordable rental and homeownership housing, expand housing opportunities for those facing homelessness or with special needs, ensure the availability of housing services and programs, address the educational, economic, and income needs of its residents, as well as improve the infrastructure within the City of Allentown. All projects funded by the City of Allentown will fall into one of the following categories: Code Enforcement and Rehabilitation, Neighborhood Revitalization, Public Services, Affordable Housing, Emergency Shelter, Rapid Rehousing.

Code Enforcement and Rehabilitation projects will address aged and unsafe housing. These projects include: The Redevelopment Authority, the City of Allentown for demolition of unsafe structures, and the City of Allentown for hazard elimination program, and a match for the City of Allentown's lead grant.

Neighborhood Revitalization projects will address public improvements for the residents of Allentown. These projects include Community Action of the Lehigh Valley Better Homes program, and the City of Allentown projects for the Aging in Place program, the Food Assistance Relocation Program, Parks and Recreation, and Public Works.

Public Services program grants were awarded through CDBG grant funding to multiple agencies. These projects include Lehigh Valley Center for Independent Living to assist disabled families, Lehigh Conference of Churches for the Daybreak program, Fine Feathers Foundation for their after-school program, The Kellyn Foundation to provide healthy nutrient food vouchers to those in need, The Neighborhood Center for its after-school program, Unidos to provide fire kits to those effected by home fires, Valley Youth House to assist homeless youth, Casa Guadalupe to support their housing assistance program, Allentown Ecumenical Food Bank to support providing food for those in need, Community Action of the Lehigh Valley to support the Housing Counseling Program to assist renters become homeowners, North Penn Legal Services to ensure fair housing coordination, and Alliance Summer Recreation Program, which is run by the Allentown Health Bureau for their summer youth program.

Affordable Housing is being funded through HOME grants. These include Valley Housing Development Corporation for the revamping of Gordon Street, Alliance for Building Communities for the construction of 24 affordable units of general occupancy housing located at the ABC Commons on Linden (CHDO), HDC Mid Atlantic for the creation of 1528 West Apartments, Habitat for Humanity for the

Home Repair Project, which assists low to mid income families with vital exterior home repairs.

Emergency Shelter and Rapid Rehousing Programs are being funded by the ESG grant. Emergency Shelter Programs include Community Action Committee of the Lehigh Valley- Six Street Shelter and Salvation Army. To address the homeless, the City supports the Salvation Army Warming Station. Rapid Rehousing needs, Lehigh Conference of Churches will address Rapid Rehousing needs.

The City of Allentown’s housing and community development programs are designed to complement one another. Foreclosure prevention, eviction diversion, vacant land management, and commercial corridor improvements all serve to combat blight. Taken together, the City’s projects, though listed here individually, are in fact a holistic response to the needs of residents and their neighborhoods.

Projects

#	Project Name
1	2024 City of Allentown Demolition
2	2024 City of Allentown Hazard Elimination
3	2024 City of Allentown Lead Match
4	2024 City of Allentown Redevelopment Authority
5	2024 City of Allentown 108 Loan
6	2024 City of Allentown - Administration - CDBG
7	2024 City of Allentown - Administration - HOME
8	2024 City of Allentown - Administration - ESG
9	2024 Community Action Better Homes
10	2024 City of Allentown - Aging in Place
11	2024 City of Allentown Food Assistance
12	2024 City of Allentown Parks and Recreation
13	2024 City of Allentown Public Works
14	2024 Allentown Ecumenical Food Bank
15	2024 Alliance Hall Summer Rec Program
16	2024 Community Action Housing Counseling
17	2024 Casa Guadalupe
18	2024 The Neighborhood Center
19	2024 Lehigh Conference of Churches - Daybreak
20	2024 Fine Feather Foundation
21	2024 Kellyn Foundation
22	2024 Lehigh Valley Center for Independent Living
23	2024 North Penn Legal Services
24	2024 Unidos
25	2024 Valley Youth House

Table 7 - Project Information

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

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

The strategies outlined in **Allentown Vision 2030 Plan** -- the City's 10-year Comprehensive and Economic Development Plan adopted by City Council in December of 2019, the City's 5-year comprehensive plan adopted by Council May 2020, as well as the analysis of impediments adopted by Council August 2021. Additional strategies included those projects that could benefit the target zone outlined by the Mayor's plan.

When feasible, the City of Allentown partners with other public agencies and nonprofit organizations to leverage resources and maximize outcomes involving housing and community development activities. In addition, several other obstacles to meeting underserved needs include:

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

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

The primary obstacles identified in meeting the needs of the underserved population, is the limited resources available to address priorities more funds to create affordable housing, less restrictions on the HOME and CHDO funds, so that developers are open to work with the city.

AP-38 Project Summary
Project Summary Information

DRAFT

1	Project Name	2024 City of Allentown Demolition
	Target Area	
	Goals Supported	
	Needs Addressed	Create and Preserve Affordable Housing
	Funding	CDBG: \$50,000
	Description	2024 demolition of city properties, home, building or other structures
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	homes targeted for demolition will be city wide.
	Planned Activities	demolition of uninhabitable buildings
2	Project Name	2024 City of Allentown Hazard Elimination
	Target Area	
	Goals Supported	
	Needs Addressed	Create and Preserve Affordable Housing
	Funding	CDBG: \$100,000
	Description	2024 Hazard elimination
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	2 families will be assisted with lead hazard removal
	Location Description	435 Hamilton Street, Allentown, PA
	Planned Activities	Lead remediation
3	Project Name	2024 City of Allentown Lead Match
	Target Area	
	Goals Supported	
	Needs Addressed	Create and Preserve Affordable Housing
	Funding	CDBG: \$100,000

	Description	2024 Lead Match
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Lead Match requirement
4	Project Name	2024 City of Allentown Redevelopment Authority
	Target Area	
	Goals Supported	
	Needs Addressed	Create and Preserve Affordable Housing
	Funding	:
	Description	2024 to the Redevelopment Authority for the acquisition and resale of desolate properties.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	city-wide
	Planned Activities	Funding for the acquisition and resale of desolate properties.
5	Project Name	2024 City of Allentown 108 Loan
	Target Area	
	Goals Supported	
	Needs Addressed	Create and Preserve Affordable Housing
	Funding	CDBG: \$200,000
	Description	2024 repayment of 108 Loan
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	

	Location Description	435 Hamilton Street, Allentown, PA 18101
	Planned Activities	Repayment of the 108 loan requirement.
6	Project Name	2024 City of Allentown - Administration - CDBG
	Target Area	
	Goals Supported	
	Needs Addressed	Create and Preserve Affordable Housing
	Funding	CDBG: \$460,492
	Description	2024 CDBG Administration
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	435 Hamilton Street, Allentown, PA 18101
	Planned Activities	Administration and oversight of the CDBG program
	7	Project Name
Target Area		
Goals Supported		
Needs Addressed		Create and Preserve Affordable Housing
Funding		HOME: \$97,881
Description		2024 HOME Administration
Target Date		12/31/2025
Estimate the number and type of families that will benefit from the proposed activities		
Location Description		435 Hamilton Street, Allentown, PA 18101
Planned Activities		Administration and oversight of the HOME program.
8		Project Name
	Target Area	
	Goals Supported	
	Needs Addressed	Reduce Homelessness

	Funding	ESG: \$202,362
	Description	2024 ESG Administration
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	521 homeless people 10 families provided stabilization services
	Location Description	City of Allentown - 435 Hamilton Street, Allentown, PA 18101 Sixth Street Shelter - 219 North Sixth Street, Allentown, PA 18102 Salvation Army - 344 North 7th Street, Allentown, PA 18102 YMCA - 425 South 15th Street, Allentown, PA 18102 Lehigh Conference of Churches - 457 West Allen Street, Allentown, PA 18102
	Planned Activities	shelter and stabilization services for homeless families.
9	Project Name	2024 Community Action Better Homes
	Target Area	
	Goals Supported	
	Needs Addressed	Create and Preserve Affordable Housing
	Funding	CDBG: \$260,000
	Description	2024 Community Action Homes - Owner-Occupied Housing Rehabilitation (Roofing and Electrical Replacement)
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	10 owner-occupid housing rehabilitation projects
	Location Description	City of Allentown with priority given to those in the area that is bound by Linden and Chew, North Law to North Fountain Streets (census tracks 10 and 18)
	Planned Activities	Rehabilitation of 10 owner-occupied housing projects.
10	Project Name	2024 City of Allentown - Aging in Place
	Target Area	
	Goals Supported	

	Needs Addressed	Create and Preserve Affordable Housing
	Funding	CDBG: \$50,000
	Description	
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	5 elderly families assisted with housing rehabilitation
	Location Description	Citywide
	Planned Activities	rehabilitation of housing for the elderly population to allow them to age in place.
11	Project Name	2024 City of Allentown Food Assistance
	Target Area	
	Goals Supported	
	Needs Addressed	Improve Access to Essential Services & Amenities
	Funding	CDBG: \$5,000
	Description	2024 costs to run the Food Pantry covered by the City of Allentown
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	500 persons assisted with food needs.
	Location Description	Citywide
	Planned Activities	food pantry for those with food insecurity.
12	Project Name	2024 City of Allentown Parks and Recreation
	Target Area	
	Goals Supported	
	Needs Addressed	Build a Strong, Resilient and Diversified Economy
	Funding	CDBG: \$304,946
	Description	2024 Parks and Recreation Capital Projects and expenses in Franklin Park and the MLK Trail
	Target Date	12/31/2025

	Estimate the number and type of families that will benefit from the proposed activities	500 persons will benefit from the improvements made to the public park
	Location Description	Franklin Park and the MLK Trail
	Planned Activities	improvements needed for Franklin Park.
13	Project Name	2024 City of Allentown Public Works
	Target Area	
	Goals Supported	
	Needs Addressed	Build a Strong, Resilient and Diversified Economy
	Funding	CDBG: \$304,946
	Description	2024 Public Works expenses related to Turner Streetscape phase 2
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	500 people will benefit from the improvements made to Turner Street.
	Location Description	Turner Streetscape, Allentown, PA
	Planned Activities	improvements to the streetscape on Turner Street in Allentown, PA
14	Project Name	2024 Allentown Ecumenical Food Bank
	Target Area	
	Goals Supported	
	Needs Addressed	Improve Access to Essential Services & Amenities
	Funding	CDBG: \$35,000
	Description	2024 Food and personal care items, as well as general operating expenses related to the Allentown Ecumenical Food Bank
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	200 families with food insecurity.
	Location Description	417 N 14th Street, Allentown, PA 18102
	Planned Activities	provide food for those with food insecurity.

15	Project Name	2024 Alliance Hall Summer Rec Program
	Target Area	
	Goals Supported	
	Needs Addressed	Build a Strong, Resilient and Diversified Economy
	Funding	CDBG: \$9,000
	Description	2024 summer recreation program for children of low to moderate income
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	100 children per week between the ages of 7 and 13 for a 5 week operational period.
	Location Description	245 North 6th Street, Allentown, PA 18102
	Planned Activities	Summer recreation program offering positive life skills, self-awareness, and self-esteem building activities.
16	Project Name	2024 Community Action Housing Counseling
	Target Area	
	Goals Supported	
	Needs Addressed	Build a Strong, Resilient and Diversified Economy
	Funding	CDBG: \$20,000
	Description	2024 Housing Counseling program to provide low to moderate income families with a continuum of services to encourage and assist with homeownership.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	60 people assisted with housing counseling services.
	Location Description	1337 East Fifth Street, Bethlehem, PA 18015
	Planned Activities	Housing Counseling services provided to low to moderate income families with a continuum of services to encourage and assist with homeownership
	Project Name	2024 Casa Guadalupe

17	Target Area	
	Goals Supported	
	Needs Addressed	Create and Preserve Affordable Housing
	Funding	CDBG: \$60,000
	Description	2024 Housing Assistance - Interim Assistance program for costs related to rent/mortgage, security deposits, utilities, major home repairs (HVAC units).
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	60 low to moderate income households assisted.
	Location Description	218 North 2nd Street, Allentown, PA 18102
	Planned Activities	Interim Assistance program for costs related to rent/mortgage, security deposits, utilities, major home repairs (HVAC units)
18	Project Name	2024 The Neighborhood Center
	Target Area	
	Goals Supported	
	Needs Addressed	Build a Strong, Resilient and Diversified Economy
	Funding	CDBG: \$16,369
	Description	2024 neighborhood community center. The center provides year-round educational opportunities for low to moderate income youth with an objective to provide supervision, enriching experiences, and positive social interaction.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	20 youth
	Location Description	435 North 7th Street, Allentown, PA 18102
Planned Activities	The center provides year-round educational opportunities for low to moderate income youth with an objective to provide supervision, enriching experiences, and positive social interaction.	
	Project Name	2024 Lehigh Conference of Churches - Daybreak

19	Target Area	
	Goals Supported	
	Needs Addressed	Reduce Homelessness
	Funding	CDBG: \$20,000
	Description	2024 Daybreak Program will provide a drop-in center offering self-sufficiency programs and supportive counseling for persons with mental disabilities who may be at risk of becoming homeless.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	60 people with mental disabilities
	Location Description	457 West Allen Street, Allentown, PA 18102
	Planned Activities	Provide a drop-in center offering self-sufficiency programs and supportive counseling for persons with mental disabilities who may be at risk of becoming homeless.
20	Project Name	2024 Fine Feather Foundation
	Target Area	
	Goals Supported	
	Needs Addressed	Build a Strong, Resilient and Diversified Economy
	Funding	CDBG: \$50,000
	Description	2024 Fine Feather Excelsior After School Program. Program will expand into two additional elementary schools, Central Elementary and Brigadier General Anna Mae Hayes Elementary Schools. Program will impact students age 7 to 12 from low-income families.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	50 students age 7 to 12.
	Location Description	215 North 9th Street, Allentown, PA 18102

	Planned Activities	Program will expand into two additional elementary schools, Central Elementary and Brigadier General Anna Mae Hayes Elementary Schools. Program will impact students age 7 to 12 from low-income families.
21	Project Name	2024 Kellyn Foundation
	Target Area	
	Goals Supported	
	Needs Addressed	Improve Access to Essential Services & Amenities
	Funding	CDBG: \$60,000
	Description	2024 Kellyn Foundation Healthy Neighborhood Immersion Initiative where funds go directly to the families as food vouchers to provide healthy nutrient dense whole foods their neighborhoods, making the healthy choice the easy choice.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	400 people will benefit from food assistance.
	Location Description	9th and Turner Neighborhood Area, Allentown, PA 18102
Planned Activities	Healthy Neighborhood Immersion Initiative funds go directly to the families as food vouchers to provide healthy nutrient dense whole foods their neighborhoods, making the healthy choice the easy choice.	
22	Project Name	2024 Lehigh Valley Center for Independent Living
	Target Area	
	Goals Supported	
	Needs Addressed	Improve Access to Essential Services & Amenities
	Funding	CDBG: \$10,000
	Description	2024 LVCIL - People Living in Accessible Community Environments (P.L.A.C.E.) is being funded to advance the ability of persons with disabilities to live independently.
	Target Date	12/31/2025

	Estimate the number and type of families that will benefit from the proposed activities	20 people with disabilities.
	Location Description	713 North 13th Street, Allentown, PA 18102
	Planned Activities	People Living in Accessible Community Environments (P.L.A.C.E.) is being funded to advance the ability of persons with disabilities to live independently.
23	Project Name	2024 North Penn Legal Services
	Target Area	
	Goals Supported	
	Needs Addressed	Improve Access to Essential Services & Amenities
	Funding	CDBG: \$15,000
	Description	2024 NPLS Fair Housing to further fair housing within the City of Allentown. The objective is to educate low-income people of their fair housing rights. The project activities include coordinating fair housing training and outreach events.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	30 low income families
	Location Description	559 Main Street, Suite 200, Bethlehem, PA 18018
	Planned Activities	Fair housing within the City of Allentown. The objective is to educate low-income people of their fair housing rights. The project activities include coordinating fair housing training and outreach events.
24	Project Name	2024 Unidos
	Target Area	
	Goals Supported	
	Needs Addressed	Improve Access to Essential Services & Amenities
	Funding	CDBG: \$30,000
	Description	2024 Unidos4Safety: funding for emergency preparedness kits specifically created for families, FireSafe Kits specifically created for families, and salary for full-time pantry coordinator.

	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	45 people in need of emergency assistance
	Location Description	Allentown Health Bureau, Allentown, PA 18102
	Planned Activities	funding for emergency preparedness kits specifically created for families, FireSafe Kits specifically created for families, and salary for full-time pantry coordinator.
25	Project Name	2024 Valley Youth House
	Target Area	
	Goals Supported	
	Needs Addressed	Reduce Homelessness
	Funding	CDBG: \$20,000
	Description	2024 Synergy Project for youth experiencing homelessness between the ages of 16 and 24. The salary for the Program Coordinator who provides direct service by identifying, engaging, and assisting homeless youth in resolving their housing crisis while providing connections to the community resources.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	75 youth between the ages of 16 and 24
	Location Description	3400 High Point Blvd, Bethlehem, PA 18017
	Planned Activities	youth experiencing homelessness between the ages of 16 and 24. The salary for the Program Coordinator who provides direct service by identifying, engaging, and assisting homeless youth in resolving their housing crisis while providing connections to the community resources.

AP-50 Geographic Distribution – 91.220(f)

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

In 2024, the City of Allentown is targeting approximately 100% of CDBG funds specifically to the neighborhoods of the City of Allentown and/ or the residents of the City of Allentown.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

As the 2020-2024 Five-Year Consolidated Program enters its final year, we will soon start developing the 2025-2029 Consolidated Plan, which identifies the housing and community development needs that will identify specific goals and objectives over the next five-year period. The city is embarking on an Affordable Housing and Community Health Needs Assessment to further implement the goals of the Allentown, which are to promote a safer, cleaner, and healthier place to live.

With these studies all being done at the same time, the city will work with advisors to put forward a joint initiative to better serve the residents of Allentown and allow federal funds to serve our neighborhoods with the greatest needs. The Plan is submitted to U. S. Department of Housing and Urban Development (HUD) for approval to continue to receive and administer programs for the Community Development Block Grant funds, (CDBG), HOME Investment Partnership Programs (HOME) and Emergency Solutions Grants (ESG).

As we enter the 50th grant year, the City of Allentown will have an application period; this year’s applicants are asked to focus on the services and programs that have measurable goals and objectives, are in alignment with the city’s Consolidated Plan (P. 143-183) and benefit the residents of a geographic area that is bound by Linden and Chew, North Law to North Fountain streets. Projects that are located within this geographic region will receive priority consideration for funding.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Allentown aims to allocate its CDBG and HOME entitlement funds to enhance the quality of life in city neighborhoods, particularly for extremely low, very low, and low-income households. The overarching objectives are to preserve and augment the supply of affordable owner-occupied and rental housing units. The following specific objectives have been established:

1. **Expand Homeownership:** Facilitate the creation of new homeownership opportunities through initiatives such as first-time homebuyer assistance, new construction projects, and substantial rehabilitation efforts targeting blighted housing.
2. **Preserve Existing Housing:** Provide financial assistance to lower-income homeowners to undertake necessary rehabilitation work aimed at bringing their homes up to code standards.
3. **Expand Rental Housing:** Offer support to developers for the construction of new rental housing units or the repurposing of non-residential properties into residential spaces.
4. **Support Public Housing Improvements:** Collaborate with the City of Allentown Housing Authority to enhance the quality and amenities of public housing facilities.
5. **Support Housing Development for Vulnerable Populations:** Extend assistance to both non-profit and for-profit developers seeking funding for projects aimed at providing housing solutions for vulnerable demographics, such as persons with disabilities and the elderly.
6. **Develop Permanent Supportive Housing:** Foster the creation of new permanent supportive housing options tailored to individuals who require comprehensive support services beyond basic

accommodation to overcome homelessness.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	48
Special-Needs	0
Total	48

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	48
Rehab of Existing Units	2
Acquisition of Existing Units	0
Total	50

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The City of Allentown consistently engages with its community development partners and agencies to strategize and implement a diverse array of revitalization initiatives within its jurisdiction. These collaborative efforts are essential for addressing the affordable housing needs of our community. Projects funded through the federal allocations outlined in this plan, alongside activities supported by private entities, form the backbone of our comprehensive approach.

Our allocations for Program Year 2024 include significant federal funds that will be utilized to support affordable housing projects through the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grants (ESG). These funds are instrumental in our efforts to increase the availability of affordable housing, support housing rehabilitation, and provide emergency housing solutions. Through continuous collaboration with our partners, we ensure that our strategies are effectively aligned with the community's needs, thereby maximizing the impact of both public and private investments in our city's revitalization.

AP-60 Public Housing – 91.220(h)

Introduction

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

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

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

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

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

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

In 2023, the Allentown Housing Authority secured all funds for Little Lehigh development the demolition and reconstruction of the development and added several new units. This project is near completion. This will provide 48 income restricted units. Each household will only pay 30% of their income in rent. The lower tiers will be supported by project-based vouchers. The project includes 3- and 4-bedroom units to accommodate larger families. The development will also include accessible apartments that meets the requirements of the Americans with Disabilities Act (ADA) and the Uniform Federal Accessibility Standards (UFAS). Currently, the Little Lehigh development does not include any ADA or

UFAS units.

Five of the seven public housing developments currently have a resident council. The resident council provides input and are primarily involved in planning for, and feedback on, renovation/modernization needs of the developments. The resident council attends regular meetings and takes 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 council engaged. It plans to seek involvement and support of the council by scheduling regular meetings with the Director of Social Services or AHA Executive Director.

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

The Allentown Housing Authority recognizes the inherent difficulty in keeping the resident council engaged. It plans to maintain involvement and support of the council by scheduling regular meetings with the AHA Executive Director. It is anticipated that by employing this strategy, residents will be able to have a direct impact on decisions and projects related to improving their living environments.

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

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

Not applicable. The Allentown Housing Authority is not in financial trouble.

Discussion

While the redevelopment of Little Lehigh is near completion, the Housing Authority is currently working on other projects to develop additional affordable housing within the city.

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

Introduction

The City of Allentown (City) is a member of the Eastern Pennsylvania Continuum of Care (CoC), which is coordinated by the Northeast Regional Homeless Advisory Board 509. At the local level this is coordinated by the Lehigh Valley Regional Homeless Advisory Board (LVRHAB), which submits the annual CoC Consolidated Application for funding on behalf of the CoC. The City works with the LVRHAB to address homelessness by working together to develop a framework to deliver housing and services to the homeless and those at risk of homelessness. The LVRHAB carries out its activities throughout Lehigh and Northampton Counties, which includes the Cities of Allentown, Bethlehem, and Easton.

The City's Grant Manager attends the local LVRHAB meetings, participates as a member of the board, and acts as the City's representative. The City coordinates its activities with the LVRHAB and the Continuum of Care and supports its applications for funds. The City helps the CoC to address homelessness by working together to develop a framework to deliver housing and supportive services to the homeless and those at risk of homelessness. The CoC identifies regional and local homeless issues; coordinates regional planning; identifies regional housing gaps and needs, strategies, and priorities; provides input for Supportive Services for Veteran Families (SSVF) and Emergency Solutions Grants (ESG) applications; participates in completion of the CoC application; monitors Homeless Management Information Systems (HMIS) participation and implementation; and coordinates and follows-up on the Point in Time count and Annual Homeless Assessment Report.

Homelessness is an ongoing social concern, with rising housing costs and lack of availability for affordable housing. The City is currently working alongside a vulnerable population. Working with the homeless population often involves working with individuals who experience addiction, mental health, domestic violence, health, and poverty. It is now believed that these problems can best be reduced by partnering with social service organizations with regional governments and communities so that maximum coordination of all housing and support services is exercised.

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

The Commonwealth of Pennsylvania's Department of Community and Economic Development is the Collaborative Applicant for the Eastern PA CoC. The Collaborative Applicant is the eligible applicant (State, unit of local government, private, nonprofit organization, or public housing agency) designated by the CoC to collect and submit the required CoC Application information for all projects the CoC has

selected for funding and apply for CoC planning funds on behalf of the CoC. The Eastern PA CoC is currently an unincorporated organization that serves as the primary decision-making group for the CoC process. The CoC's responsibilities include reviewing all other efforts that will eliminate homelessness and improve the well-being of homeless persons and families in Eastern Pennsylvania region.

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

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

The Eastern Pennsylvania CoC and LVRHAB rely on its member organizations to conduct homeless outreach and assessments. Outreach workers visit known encampments to offer assistance as well as provide information on supportive and health care services. Shelters offer meals, services, bathing, and shower facilities to homeless individuals and families. Care management services are provided on an individual basis to assist in referrals for housing, shelter, health care, and other human services.

The following data was collected during the 2024 Point-In-Time Survey conducted by the Eastern Pennsylvania CoC on January 24, 2024. The Point-In-Time Survey was performed at the following locations throughout the CoC service area: hospitals, soup kitchens, day programs, street outreach, shelters, transitional housing of various types, and permanent housing which addresses the needs of the

homeless. The following information is specific to the LVRHAB PIT Count.

Unsheltered:

- Total Households – 170
- Total Persons – 212
- Children under 18 years old – 0
- Young Adults 18 to 24 years old – 13
- Adults 25 years old and older – 199

Transitional Housing:

- Total Households – 71
- Total Persons – 148
- Children under 18 years old – 64
- Young Adults 18 to 24 years old – 21
- Adults 25 years old and older – 63

Emergency Shelter:

- Total Households – 210
- Total Persons – 329
- Children under 18 years old – 110
- Young Adults 18 to 24 years old – 26
- Adults 25 years old and older – 193

The City has identified the chronically homeless in Allentown as mainly the childless adult group with

serious disabling conditions. Outreach to connect services to the homeless populations is provided by the various agencies who operate within the City as well as those agencies who reach out to homeless veterans. In addition to emergency shelter and transitional housing resources, there are several Rapid Rehousing and Permanent Supportive Housing resources available to residents of Allentown experiencing homelessness, that are accessible through Connect to Home, the CoC's Coordinated Entry system. Additionally, the non-profit organization Turning Point of Lehigh Valley operates a Domestic Abuse Hotline that is likewise available on a 24/7 basis. Valley Youth House provides Street Outreach services, and other emergency situations require the use of the County 211 system.

Addressing the emergency shelter and transitional housing needs of homeless persons

The CoC utilizes a comprehensive Coordinated Entry process that is fully implemented throughout Lehigh and Northampton Counties, including the City. Coordinated Entry (CE) coordinates access, assessment and referral to housing and services for families and individuals experiencing or at imminent risk of homelessness. CE provides standardized and coordinated assessment and referral service for everyone who is seeking services from the network of homeless services in Lehigh and Northampton County. Clients will complete an assessment with an intake caseworker and will then be referred to the appropriate program.

Lehigh Valley Coordinated Entry Walk-in Access Sites in Lehigh and Northampton Counties include:

- Bethlehem Emergency Sheltering
- New Bethany
- Third Street Alliance
- Lehigh Conference of Churches
- Valley Youth House – for area youth

The goals of Coordinated Entry are:

- To respond to a housing crisis by providing low barrier, person centered, county-wide entry process that is fair and allows equal access to housing assistance and homeless prevention resources.
- To utilize the same assessment approach and decision-making processes to help people resolve their housing crisis, to become stably housed as quickly as possible and to implement an easily accessible process that allocates resources as effectively as possible no matter how or where people present.
- To ensure that people with the most severe needs and levels of vulnerability are prioritized for

housing and homeless assistance.

- To develop a Housing Stability Plan that identifies housing barriers, is inclusive of individual needs and includes client chosen referrals, linkages to services, housing assistance and financial stability resources.

Any family or individual experiencing a housing crisis in the City can either call the 211 hotline or visit a designated coordinated entry provider in Lehigh or Northampton County. Veterans, people fleeing domestic violence, and transitional age or runaway youth will be immediately connected to appropriate services. Families and single adults will be assessed using a national best practice vulnerability and service prioritization tool called the VI-SPDAT. Consumers will then be referred and connected to appropriate housing and services as they become available.

The shelters and transitional housing in Allentown:

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

In order to meet the City's Goals to participate in a regional effort to contribute to meeting the shelter and service needs of homeless residents within the City, as well as to assist residents of the City in imminent danger of becoming homeless the City has budgeted \$202,362.00 for grant year 2024 in Emergency Solutions Grant funds. These funds support three emergency shelters and one rapid re-housing program. Activities are implemented by the City, The CACLV Sixth Street Shelter, YMCA Warming Station, The Salvation Army, and the Lehigh Conference of Churches.

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

The City provides assistance to local agencies that provide transitional housing for Veterans and their families, families with children and families that are victims of domestic violence, and individuals dealing with mental health or substance abuse problems, to move them into more permanent housing

solutions. The CoC has adopted HUD’s Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing, as well as the accompanying updated HUD Notice. This notice established Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System. All qualifying populations that are eligible for a project or activity will be included in the CoC Coordinated Entry (CE) process. All households seeking service are provided fair and equal access regardless of their location or method by which they access the system.

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

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

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

The first defense against homelessness is prevention and/or diversion services. It is more cost effective for many households to maintain their housing rather than the Coordinated Entry facilitating entry into the homeless emergency system and rehousing the family. The City in conjunction with the LVRHAB has a strong system for prevention and intervention services but does not have the funding required to end homelessness.

Shelter diversion will help at-risk households seeking shelter to identify alternative housing options and to offer support services that will help them stabilize until a permanent housing opportunity becomes available. Shelter diversion is handled through the coordinated entry intake process and is used in cases where it is a safe alternative to shelter.

Prevention assistance, usually in the form of immediate and short-term rental and/or utility assistance, provides a means of preserving permanent housing situations and saving households from entering the homeless assistance system. Prevention and diversion programs are of critical importance to keeping

people from becoming homeless in the face of a personal crisis.

The CoC has a discharge policy in place for those exiting a publicly funded institution or system of care. This population is especially at risk of becoming homeless and requires skilled case managers to place these individuals in affordable housing. The City provides assistance to local agencies that provide services to families and individuals in transitional situations with housing stabilization or placement assistance, financial counseling, emergency rent/mortgage/utility payment assistance, and employment counseling so they can retain self-sufficiency and avoid homelessness.

The LVRHAB is participating with other state CoCs through the PA Homeless Steering Committee to develop partnerships with state agencies that operate programs that discharge individuals to homelessness. Discharge planning by youth serving agencies includes steps to prepare youth for discharge from foster care. The Federal Fostering Connections to Success Act requires that young people exiting the foster care system have a transition plan at least 90 days before they discharge from care—whether that is when they are 18 or older. In Pennsylvania, youth can remain in foster care until they are 21 if they meet certain eligibility requirements. In addition, Pennsylvania law allows youth to petition to re-enter care up to age 21 if they exited foster care after their 18th birthday. Mental health discharge is coordinated with the County Office of Mental Health. The Departments of Corrections and Public Welfare are working to implement a new protocol to ensure that those leaving penal institutions are enrolled in Medical Assistance through the COMPASS application process. This process also will tie into Food Stamps and cash assistance. Discharge from health care is more difficult due to the special needs and short time frame involved in discharge. The PA Homeless Steering Committee is working with the Department of Health, Division of Acute and Ambulatory Care to research and establish protocols.

Coordination of services and local advocacy ensures that families that are already enrolled in one system of care are properly referred to other agencies providing appropriate services. The implementation of the 211 system will help expand the degree of coordination. This Action Plan includes several projects to help individuals and families avoid becoming homeless, including legal services to halt evictions and address housing discrimination.

Discussion

The City has several subrecipients that provide services to non-homeless special needs persons.

The Allentown Housing Authority and Valley Housing Development Corporation are rehabilitating their properties to improve the quality of life of their public housing residents. These upgrades include larger spaces, energy efficient appliances, and community spaces for residents to enjoy.

In addition, the Lehigh Valley Center for Independent Living provides housing counseling, supports coordination, living skills, and education services to those living with a disability. A Community Support Coordinator will help consumers maintain their current housing or find more affordable housing options. Housing counseling remains increasingly importance as rising housing prices continue to

increase the housing instability. During the intake, program staff will review each consumer’s living situation, lease agreement, income, and expenses to understand what additional support they may need to maintain their current housing. Staff will advocate on behalf of consumers to their landlords and will also refer them to community agencies that can offer supplemental services, such as North Penn Legal Services and Lehigh Conference of Churches.

North Penn Legal Services provides legal services to low-income residents of 20 counties within the Northeast, including the City. North Penn provides a Lehigh Valley Fair Housing Project which refers to local and federal laws enacted to make sure that all individuals have equal access to the housing of their choice. These laws prohibit discrimination in housing on the basis of race, color, religion, sex, national origin, familial status, disability, and gender expression. North Penn also coordinates fair housing training and outreach events, distribution of fair housing materials, work on fair housing cases, and participation in additional county-wide fair housing opportunities.

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

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

Introduction:

Following 2020, a significant obstacle to affordable housing emerged as a surge in evictions occurred due to residents' inability to pay rent, often stemming from unemployment or insufficient income. Additionally, in 2023, the escalation of fair market rent further compounded this challenge.

In the City of Allentown, property owners are subject to real estate taxes levied by the City, Lehigh County, and the Allentown School District. Each governing body determines its respective tax rate, with the actual tax liability calculated based on this rate multiplied by the assessed value of the property, a figure determined by Lehigh County. The most recent county-wide reassessment took place in 2013, during which the County Commissioners set the assessment percentage, known as the "predetermined ratio," at 100% of the Fair Market Value.

Due to state legislation limiting the City's earned income tax to one percent, the municipality heavily relies on real estate taxes for revenue generation. In fact, real estate taxes contribute more than three times the revenue earned through earned income taxes, making it the primary revenue source for the City. While the City's tax rate remains comparable to that of other cities of similar size, homeowners in Allentown face a relatively higher tax burden compared to residents in surrounding suburban municipalities.

This situation, wherein the City must disproportionately increase real estate taxes relative to neighboring municipalities, effectively inflates the costs associated with land acquisition and the development of affordable housing initiatives.

In the codified ordinances of the City of Allentown, the zoning ordinance delineates its purpose as "the

promotion of the public health, safety, morals, and/or general welfare" through various means:

- Encouraging the most appropriate utilization of land.
- Preventing land overcrowding.
- Safeguarding the value of land and structures.
- Alleviating traffic congestion on roadways.
- Mitigating undue population congestion.
- Ensuring adequate provision of light and air.
- Enhancing safety against fire, flood, and other hazards.
- Facilitating sufficient provision for transportation, water supply, sewage disposal, drainage, schools, parks, and other public amenities.
- Taking into account, among other factors, the distinct character of districts and their suitability for various uses.
- Enforcing the policies and recommendations outlined in the Comprehensive Plan, as endorsed by the City Planning Commission and ratified by the Council.

Another challenge the city faces is the lack of homeownership education and the insufficient resources available to low- and moderate-income residents. Currently, 67% of Allentown residents are renters.

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

The FY 2020 Analysis of Impediments to Fair Housing Choice for Northampton County, the City of Bethlehem, the City of Easton, and the City of Allentown has identified several impediments, along with specific goals and strategies to address each one. These impediments, which do not include issues

related to housing authorities, are detailed below:

Impediment 1: Need for Fair Housing Education and Outreach

- Issue: There is a need to improve the knowledge and understanding of the rights and responsibilities of individuals, families, members of protected classes, landlords, real estate professionals, and public officials under the Fair Housing Act (FHA).

- Goal: Enhance public awareness and understanding of the Fair Housing Act and related laws, regulations, and requirements to affirmatively further fair housing in the community.

Impediment 2: Need for Affordable Housing

- Issue: In the Allentown-Bethlehem-Easton, PA-NJ Metro Area, over half (52.2%) of renter households spend more than 30% of their monthly income on housing costs. Nearly a third (29.5%) of owner households with a mortgage also exceed this threshold. The burden of housing costs significantly increases as household income decreases.

-Goal: Increase the supply of decent, safe, and sanitary housing that is affordable and accessible through the construction of new housing and the rehabilitation of existing housing, particularly for lower-income households.

Impediment 3: Need for Accessible Housing

- Issue: There is a shortage of accessible housing units, and the supply has not kept pace with the demand from individuals who wish to live independently.

- Goal: Increase the supply of accessible housing through new construction and the rehabilitation of housing to accommodate persons with disabilities.

Impediment 4: Public Policy

- Issue: Local zoning ordinances need additional definitions and provisions concerning Fair Housing.

- Goal: Revise local zoning ordinances to promote the development of various types of affordable

housing throughout the area.

Impediment 5: Regional Approach to Fair Housing

- Issue: There is a need for a regional collaborative approach to affirmatively further fair housing.

- Goal: Establish a regional cooperative fair housing consortium to actively promote fair housing in the area.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

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

Actions planned to address obstacles to meeting underserved needs

The primary obstacle to meeting underserved needs is the limited resources available to address identified priorities. The City has applied for other grant opportunities to serve the low-income population. This year the City will continue to search for other funding opportunities to assist in meeting underserved needs. Information will be passed along to appropriate partners if the funding fits their respective missions. The City will also offer technical assistance to review these grant applications, if requested.

Actions planned to foster and maintain affordable housing

The City will continue to use CDBG and HOME funds for rehabilitation programs, as described in earlier sections, and to encourage the creation of new affordable housing as opportunities arise. The City's use of CDBG funds to prepare families for homeownership will also improve affordable housing options. Habitat for Humanity will keep low to moderate income households in their homes and HDC Mid Atlantic will develop new affordable housing units. Further, the City has a strong code enforcement program and rental property inspection program that is used to prevent blight and improve the housing stock.

Actions planned to reduce lead-based paint hazards

The City was recently awarded approximately five million dollars (\$5,000,000) from the Commonwealth of Pennsylvania to address lead-based paint hazards in homes. Currently \$100,000 CDBG funds were given as the matching funds to this grant. Approximately 300 homes will be addressed by the end of the program. By the end of the year the Community Housing Department would complete approximately 125 projects. This program continues the success of the City's recently concluded US Department of HUD Lead Hazard Reduction Demonstration Grant.

Actions planned to reduce the number of poverty-level families

The City believes that the most effective method of lowering the number of households living in poverty

is to assist them in developing the skills necessary to become more independent and self-sufficient.

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

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

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

Actions planned to develop institutional structure

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

include:

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

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

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

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

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

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

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

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

The City has improved the coordination between its existing housing programs, other agencies, and levels of government by networking/sharing information. The city will continue to enhance coordination between public and private housing and social service agencies through social media, the city website,

public meetings, and other avenues of outreach.

The approach employed by the City has proven to be a valuable tool for eliciting input that would not otherwise be available. This development process combined diverse ideas and approaches into a comprehensive planning document. The process further provides a set of strategies that address the low-income needs of the city in a clear and logical fashion. The delivery system in place for these housing, public services, and community development programs is coordinated through the City's Community Development staff. No changes to the delivery system are anticipated.

During the program year, the city will continue to encourage dialogue and collaboration with its private housing and social services agencies

Discussion:

Program Specific Requirements

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

Introduction:

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

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

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

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

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

To ensure affordability, the City must impose either resale or recapture requirements as its option. Community Housing Development Organization's (CHDO) and non-profit housing developers providing Acquisition/Rehabilitation/Resale, and New Construction activities will use resale provisions. In the event the City will budget HOME funds for the City's Down Payment and Closing Cost assistance program, (Community Partnership Program), this program will use a recapture provision.

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

Resale

This option ensures that the HOME assisted units remain affordable over the entire affordability period. The Resale method is used in cases where HOME funding is provided directly to the developer to reduce development costs, thereby making the price of the home affordable to the

buyer. Referred to as a “Development Subsidy”, these funds are not repaid by the developer to the Participating Jurisdiction (City of Allentown), but remain with the property for the length of the affordability period.

Notification to Prospective Buyers: The resale policy is explained to the prospective homebuyer(s) prior to signing a contract to purchase the HOME assisted unit. The prospective homebuyer(s) sign an acknowledgement that they understand the terms and conditions applicable to the resale policy as they have been explained.

Recapture

In the event the City would fund downpayment and closing cost assistance using HOME funds, which is a direct subsidy, the following policy would apply.

The City of Allentown’s downpayment and closing cost assistance program, if funded, could provide up to \$4,000 in downpayment and closing cost assistance to eligible first time homebuyers with incomes that do not exceed 80% of the AMI. Monthly principal and interest payments are not required. The recapture restriction will be recorded as a second or third mortgage on the property that will only be due and payable upon sale of the property within the first five years of ownership.

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

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

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

N/A

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

N/A

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR

92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

N/A

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

The City of Allentown's written standards for providing ESG assistance are included as an attachment in the Grantee Unique Appendices (see Consolidated Grants Program information and application packet).

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Connect To Home: Coordinated Entry System of Eastern PA (CES) coordinates and manages access, assessment, prioritization and referral to housing and services for any person(s) experiencing or at imminent risk of homelessness in the following counties: Adams, Bedford, Blair, Bradford, Cambria, Carbon, Centre, Clinton, Columbia, Cumberland, Franklin, Fulton, Huntingdon, Juniata, Lebanon, Lehigh, Lycoming, Mifflin, Monroe, Montour, Northampton, Northumberland, Perry, Pike, Schuylkill, Somerset, Snyder, Sullivan, Susquehanna, Tioga, Union, Wayne and Wyoming.

Participation in CES is required for all projects funded by HUD Continuum of Care or Emergency Solutions Grants (including those administered by the Commonwealth of Pennsylvania) and strongly encouraged for all other housing and service providers in order to ensure equitable and coordinated access for all.

Connect To Home Referral Partners accept appropriate program referrals from Coordinated Entry Specialists. Coordinated Entry Specialists make direct referrals to homeless prevention and emergency services, including Emergency Shelter and Transitional Housing (both of the latter through HMIS). Rapid Re-Housing and Permanent Supportive Housing providers receive their referrals from the Community Queue prioritization list in PA HMIS. The Community Queue has special protocols for both veterans and survivors of domestic violence to ensure they are connected to appropriate housing and services.

The Eastern PA CoC has selected the Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT) as its Coordinated Entry assessment tool. There is no formal training, license or fee required to use the VI-SPDAT. However, Connect To Home Coordinated Entry Specialists are required to complete the free OrgCode VI-SPDAT training webinar series online at http://www.orgcode.com/vi_spdat.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The City of Allentown has a mailing list of interested citizens, agencies and providers (which include community and faith based organizations) and as part of its Consolidated Grants Program. Letters go out to this mailing list along with an explanation of the process of applying for and awarding Community Development Block Grant Program funds, Emergency Solutions Grants Program funds and HOME Investment Partnerships Program funds. An advertisement is also placed in The Morning Call newspaper announcing the process and a public hearing is held. In addition, the process is announced at the Lehigh Valley Regional Homeless Advisory Board meeting. The City provides technical assistance to new agencies who have never navigated the application process.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The City of Allentown presents the proposed allocations to the Lehigh Valley RHAB, whose members speak for homeless individuals. Since not only ESG funds assist homeless services in the City, the presentation includes use of CDBG and HOME funds, also.

5. Describe performance standards for evaluating ESG.

The evaluation of ESG applications is consistent with the evaluations of all applicants for the City's Consolidated Grants Program funds (CDBG, ESG and HOME).

