

# FISCAL YEAR 2022

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The City of Lancaster, Pennsylvania

## **ANNUAL ACTION PLAN**

For the Program Year  
**January 1, 2022 to December 31, 2022**

For Activities Funded by the Following Federal Program:  
**COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)**

**Prepared for the Department of Housing and Urban Development (HUD)**



**CITY OF  
LANCASTER**

**Department of Community Planning & Economic Development**

Lancaster, Pennsylvania  
Municipal Building  
120 North Duke Street  
Lancaster, PA 17602

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**Danene Sorace, Mayor**

Annual Action Plan  
2022

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## **Executive Summary**

### **AP-05 Executive Summary - 91.200(c), 91.220(b)**

#### **1. Introduction**

The Department of Housing and Urban Development (HUD) informed the City of Lancaster that it will receive \$1,605,786 in Community Development Block Grant (CDBG) entitlement funding for Fiscal Year 2022. The City of Lancaster fell below the minimum threshold to receive a Fiscal Year (FY) 2022 Emergency Solutions Grant (ESG) allocation due to HUD's formula allocation regulations. To this end, the City will not be receiving direct ESG entitlement funding for the 2022 Program Year.

The City is tasked with leveraging this resource to create and foster a viable, resilient community to develop and implement mutually reinforcing approaches to providing housing, creating quality living environments, and expanding economic opportunities for the principle benefit of low- and moderate-income City residents and households. This plan will describe how the City of Lancaster will utilize this CDBG funding in its 2022 Program Year to improve the City of Lancaster.

#### **2. Summarize the objectives and outcomes identified in the Plan**

During its planning procedures for the 2021 – 2025 Consolidated Action Plan cycle, the City conducted community needs assessments to identify the City of Lancaster's priority community development needs through analyzing pertinent Census Data and contextual market conditions, conducting a needs assessment in collaboration with community stakeholders, service providers, experts, and by collecting input from community members to inform its programmatic approach to utilizing its Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) annual entitlement allocations. Based on its analysis of these data sources, the City has determined that its direct CDBG entitlement and ESG and HOME funds (as allocated and administered in collaboration with the County) will be directed toward accomplishing the following primary objectives during 2022:

1. Maintain Affordable, Good Quality Housing
2. Increase Affordable Housing Opportunities
3. Promote Neighborhood Quality of Life
4. Expand Economic Opportunities
5. Support Homelessness Services

#### **3. Evaluation of past performance**

The City's 2021 Consolidated Annual Performance Evaluation Report (CAPER) was used as an evaluation of past performance to assist the grantee in determining its projects and goals for the 2022 Program Year. As a result of this assessment, the City concluded that it has achieved programmatic success in implementing past projects and activities to the benefit of a predominately low- and moderate-income population within the scope of the available resources. As such, it will continue to provide HUD-supported assistance to these projects in 2022.

#### **4. Summary of Citizen Participation Process and consultation process**

TBD, this section will be updated with the appropriate information when the public comment period has concluded.

**5. Summary of public comments**

TBD, this section will be updated with the appropriate information when the public comment period has concluded.

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

TBD, this section will be updated with the appropriate information when the public comment period has concluded.

**7. Summary**

TBD, this section will be updated with the appropriate information when the public comment period has concluded.

DRAFT

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

**Agency/entity responsible for preparing/administering the Consolidated Plan**

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

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
CDBG Administrator	CITY OF LANCASTER	Community Planning and Economic Development
HOME Administrator	COUNTY OF LANCASTER	Redevelopment Authority of the County of Lancaster
ESG Administrator	CITY OF LANCASTER	Community Planning and Economic Development

**Table 1 – Responsible Agencies**

**Consolidated Plan Public Contact Information**

Brynn K. McGowan, Community Development Administrator, [bmcgowan@cityoflanasterpa.com](mailto:bmcgowan@cityoflanasterpa.com)  
Simone Dia, Community Development Administrator, [sdia@cityoflanasterpa.com](mailto:sdia@cityoflanasterpa.com)

## Consultation

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

#### 1. Introduction

In order to ensure that we are capturing a comprehensive picture of the community's needs, the City and County are collaborating to conduct consultations with relevant services providers and organizations to identify community needs and gaps within Lancaster to help inform our respective Annual Action Plans to utilize Fiscal Year 2022 entitlement funding from the Department of Housing and Urban Development (HUD).

A summary of the consultations conducted is provided in Table 2 below.

**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(l)):**

The City of Lancaster is heavily involved in the Lancaster County Homelessness Coalition, which is comprised of many social service agencies, housing counseling agencies, county agencies and public housing authorities. City staff also work closely with other agencies through service provider networks such as the Coalition for Sustainable Housing, the Homeless Outreach Network, Lancaster County Behavioral Health and Developmental Services (BHDS) Advisory Board, and Tenfold's Housing Equality and Equity Resource Center. Finally, our Bureau of Health works in collaboration with the local hospital. All of these partnerships enhance coordination of multidisciplinary services through their collaborative efforts to serve residents in the City.

**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:**

The Lead Agency of the Continuum of Care (PA-510) is the Lancaster County Homelessness Coalition, hosted by the Lancaster County Housing and Redevelopment Authorities. City representatives serve on the Coalition's Steering Committee and the Joint Funders Committee. The Coalition works with service providers to improve housing stability among chronically homeless individuals and families through emergency shelter, transitional housing, permanent supportive housing, and other supportive 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:**

All ESG funds are allocated and awarded in coordination with the CoC. We utilize the CoC's performance standards and policies and incorporate them into the City's ESG-funded subrecipient contract terms and conditions. City staff through the participation in the CoC's Joint Funder's Committee have supported the ongoing development and evaluation of grant and program management procedures. The City, County, United Way and Lancaster County Homelessness Coalition serve as the lead agencies in creating a joint application for service programs. This coordination between the lead agencies greatly increases efficiency and effectiveness in the delivery of services and avoids the duplication of services and funding. The City and County jointly solicit, review, and approve grant applications for eligible projects and activities assisted by ESG funds. While the City does not directly fund HMIS administration, the City requires HMIS

participation through its contractual agreements and supports the CoC in overall adherence to HMIS policy and procedures.

**2. Agencies, groups, organizations and others who participated in the process and consultations  
(See Table below)**

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**Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Lancaster County Redevelopment Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City and the Lancaster County Redevelopment Authority coordinated their planning strategies for CDBG, ESG, and HOME funding utilization in 2022. They will continue to coordinate programs and projects via monthly collaborative work sessions.



2	<b>Agency/Group/Organization</b>	City of Lancaster
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Agency - Management of Public Land or Water Resources Agency - Emergency Management Other government - Local Planning organization Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City of Lancaster Community Development staff consulted with the Bureaus of Planning, Police, Property Maintenance and Housing Inspections, Office of Lead Safety, and the Department of Public Works to identify needs and gaps within the City's affordable housing market, public policies, social service delivery mechanisms, lead safe practices and housing goals, and public infrastructure. This process helps the City better understand its needs and enhances intra-Departmental coordination to ensure effective and compliant utilization of grant funding and proactive troubleshooting of potential challenges.
3	<b>Agency/Group/Organization</b>	REDEVELOPMENT AUTHORITY OF THE CITY OF LANCASTER (RACL)
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City consulted with RACL to identify challenges and bottlenecks in the creation of affordable housing opportunities within the existing Land Bank and Vacant & Blight mechanisms and programs. The findings from the consultation will help the City formulate a comprehensive understanding of the barriers preventing organizations from creating affordable housing due to current market condition constraints while also improving collaboration between both entities to help develop viable solutions to the City's affordable housing shortage.

4	<b>Agency/Group/Organization</b>	United Way of Lancaster County
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	A consultation with United Way/211 was conducted in order to glean the challenges faced by their organization in the delivery of services and to identify the unmet needs of those in the community. It was determined that language is a major barrier to the comprehensive delivery of services. A lack of bilingual staff have resulted in the scarcity of timely homeless services and supports. Additionally, an increase in the number of rental assistance referrals or programs would address the spike in the need for housing assistance services.
5	<b>Agency/Group/Organization</b>	Economic Development Company of Lancaster County
	<b>Agency/Group/Organization Type</b>	Regional organization Business Leaders Business and Civic Leaders

	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The County spearheaded the consultation with EDC, generating findings related to the persistent County-wide need for affordable housing and a workforce deficit for low-wage/low-skilled jobs. Articulated general need to work collaboratively across municipal government levels to address housing and workforce issues, which the City and County will work towards coordinating.
6	<b>Agency/Group/Organization</b>	Lancaster County Coalition to End Homelessness
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	County and City cross-collaborated to conduct consultation that identified an increase in shelter needs driven by insufficient wages, evictions, unsustainable cost of living increases, and high rental costs. Advised that City/County should provide incentives to build new affordable units and implement a requirement for affordability in all new housing developments built county-wide. City/County governments have pledged to work collaboratively to collective leverage available resources to address homelessness.
7	<b>Agency/Group/Organization</b>	COMMUNITY ACTION PARTNERSHIP OF LANCASTER COUNTY (CAP)
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City consulted with Community Action Partnership to identify unmet needs and gaps as well as challenges and barriers in the delivery of services for housing services including those who are victims of domestic violence. This consultation provided a greater level of understanding the systemic issues that surround individuals who experienced domestic violence and/or who are fleeing domestic violence. This process allowed the City to better grasp the intricate complexities providers face when working to address the needs of clients who homeless and/or abused.
8	<b>Agency/Group/Organization</b>	YWCA Lancaster
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City conferred with the YWCA in an effort to determine housing barriers and underserved needs in the city and county. In this discussion, it was learned that systems do not seem to pair well together. While clients can be qualified for services, often times, these benefits have limitations in monetary amounts, are under the threshold of prospective rental units or individuals encounter barriers with landlord eligibility criteria. Is it believed, an underserved need in the community is the opportunity for actual homeownership.

9	<b>Agency/Group/Organization</b>	Lancaster City Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Market Analysis Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	LCHA was consulted in an effort to enhance collaboration and coordination between the City and the PHA and to better understand the challenges the organization is facing in its provision of Public Housing. This consultation process will allow the City to be better positioned to address persistent barriers impacting public housing accessibility and availability so that diverse and targeted approaches rectifying persistent barriers can be developed and implemented.
10	<b>Agency/Group/Organization</b>	Lancaster General Health
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City and County elicited input from LGH regarding lead-based health challenges in Lancaster. They advised that generally, there is a lack of experience and knowledge around lead inspection and program management and a need to educate new staff and the community around the basics of lead and dangers of lead poisoning through the implementation of Lead Programming to prevent adverse health outcomes. Proactive property maintenance and code enforcement can help to reduce lead poisoning risks and address lead in properties. The City's Lead Hazard Control has incorporated elements community engagement and education within its Lead-based Paint Strategy and will continue to engage the community in lead-focused outreach in 2022.
11	<b>Agency/Group/Organization</b>	Lancaster Emergency Medical Services Association
	<b>Agency/Group/Organization Type</b>	Health Agency Agency - Emergency Management

	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	LEMSA was consulted in order to obtain insight on the City's general public health needs and gaps. Outcomes will include enhanced coordination between entities and a better understanding of pervasive and wide-reaching mental and physical health challenges and needs of the community. The City will use feedback from this consultation to develop holistic approaches to addressing Lancaster's mental and physical health needs through methodological assessment and resultant programming.
12	<b>Agency/Group/Organization</b>	Lancaster City Alliance
	<b>Agency/Group/Organization Type</b>	Services-homeless Services-Education Services-Employment Business Leaders Business and Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis Economic Development Anti-poverty Strategy



	<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>A consultation with Lancaster City Alliance was conducted to better understand the needs and challenges faced by their organization and to identify unmet needs of those in the community related to community and economic development. LCA has experienced an increased need in the neighborhood-oriented services they provide, especially within their outreach work as more residents experience housing instability, for their Façade Improvement grants, and for capital improvements around key City corridors. They also detailed increased economic development needs for small businesses as they emerge from the pandemic and are faced with an amplification of constrained resource and workforce conditions precipitated by global supply chain issues, competition, and inflation noting that businesses need working capital and lifelines/assistance/support to ensure economic viability and vitality through complex, unpredictable market conditions. The overarching need for workforce development assistance was identified as a major factor for sustaining affordable housing provision in addition to more transitional housing opportunities. Organizationally, LCA has seen challenges in capacity, staffing, and the rising costs of development over the last year.</p> <p>LCA noted community needs around equitable streetscape programming and an expansion of the City's Critical Repair and Housing Code Enforcement programs to address maintenance challenges for the City's low and very-low-income residents and improve the safety and security City's housing stock. Based on this qualitative data and feedback, the City is exploring additional funding mechanisms and avenues to expand and enhance its housing rehabilitation and code enforcement programming, distribute its streetscape improvements with an intentionally equitable approach, and to support workforce development initiatives to buttress Lancaster's economic development.</p>
13	<b>Agency/Group/Organization</b>	ASSETS, LANCASTER
	<b>Agency/Group/Organization Type</b>	Services-Education Services-Employment Business Leaders Business and Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis Economic Development Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City consulted with ASSETS in order to ascertain socioeconomic and structural conditions impacting Lancaster's economic development and vitality. Outcomes include a better understanding of the physical and financial conditions constraining small business development and success including lack of childcare, restricted public transportation options, and shortage of affordable commercial space.
14	<b>Agency/Group/Organization</b>	Lancaster County Workforce Development Board (LCWDB)
	<b>Agency/Group/Organization Type</b>	Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Workforce Development Board was engaged to gain perspective on the County's employment needs, labor force, and job market. LCWDB indicated that biggest issues that affect workforce are access to affordable housing and affordable childcare, and broadband internet access. These issues pose barriers to working parents who are seeking job services. Access to dependable, expansive public transit is a also huge need for job seekers who are often constrained by transportation options. Further, policy and advocacy is needed around fair wages, job training, and workforce development that aligns with job market conditions to alleviate conditions perpetuating poverty.
15	<b>Agency/Group/Organization</b>	Lancaster County Food Hub
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Lancaster County Food Hub was consulted to ascertain the obstacles and impediments in service delivery for the homeless population and to identify the underserved needs of the community. The City's consultation revealed a lack of sufficient and appropriate space (capacity) to accommodate the volume of clients, and the medical expertise to address the needs of those with mental health and addiction recovery treatment needs. This method has enlightened us to an urgent need for more mental health clinicians and adequate spacing for homeless persons.
16	<b>Agency/Group/Organization</b>	Lancaster County Office of Aging
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	TBD.
17	<b>Agency/Group/Organization</b>	Tenfold
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment

<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Tenfold was consulted with the aim of sorting through the hindrances of service delivery and identifying areas of greatest need in serving the homeless population. The challenges faced by this organization mainly relate to the limited supply of housing inventory and the increased demand for these properties. Greatest area of need is in assisting persons eligible for prison release, get released. Many are often denied release due to the inability to provide a viable home address and many experience frequent occurrences of recidivism because of the lack of available programs or services to support them upon release.

**Table 2 – Agencies, groups, organizations who participated**

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

N/A

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Strategic Plan	Lancaster County Homelessness Coalition	Both plans support Homelessness Services through furthering the provision of emergency shelter, rapid rehousing, street outreach, coordinated assessment in collaboration with the Coalition.
City of Lancaster's Interim Housing Strategy	City of Lancaster	Both plans are focused on improving and preserving the quality, safety, and affordability of City housing stock and increasing the number of affordable housing units for low- and moderate-income residents.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Building on Strength	Lancaster City Alliance	Both plans identify a need for affordable and mixed-income housing development and more efficient transportation options for travel within City. The plans also support programming promoting entrepreneurship and creating equitable job opportunities through education and resource access while fostering an environment where small businesses can thrive.

**Table 3 - Other local / regional / federal planning efforts**

**Citizen Participation**  
**AP-12 Participation - 91.401, 91.105, 91.200(c)**

**Summary of citizen participation process/Efforts made to broaden citizen participation**

A legal advertisement was placed in the Lancaster Newspaper on Saturday, June 18th, announcing a minimum 30-day public comment period. A public meeting was announced via newspaper advertisement on June 13th and subsequently advertised on the City's website and through social media.

The draft plan is currently on the City's website. Any comments will be included as an appendix in the final draft of the 2022 Annual Action Plan and all comments will be considered in the final version of the plan.

The City is committed to developing processes and procedures that effectively engages the public and accurately garners public concerns and comments.

**Citizen Participation Outreach - TBD**

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)
TBD						

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

The City of Lancaster will utilize the following resources to provide financial assistance and support in furthering its five (5) primary community development goals and objectives in 2022:

1. Maintain Affordable, Good Quality Housing
2. Increase Affordable Housing Opportunities
3. Promote Neighborhood Quality of Life
4. Expand Economic Opportunities
5. Support Homelessness Services

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of Con Plan \$ (2023 – 2025)	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public - Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$1,605,786	\$25,000	\$0	<b>\$1,630,786</b>	\$4,842,358.00	2022 Entitlement Amount and estimated 2022 Program Income with estimated 2023 – 2025 estimated entitlement based on FY 2022 allocation and estimated yearly Program Income.

**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 City continues to utilize Federal CDBG funding to leverage private, state, and local funding sources. CDBG funds will supplement a variety of programs that have other sources of funding. The Place-Based Streetscape Improvements program uses other state grant funds such as a Keystone Grant as well as City Capital Improvement funds. The 2022 CDBG funding allocated to support the Critical Repair and Critical Repair and Lead Hazard Control Program Administration will leverage the City's \$700,000 Healthy Homes Supplemental funding and a \$9.1M Lead Hazard Reduction Grant from the Department of Housing and Urban Development (HUD) to deliver holistic, impactful approaches to strengthen the City's affordable housing stock and resident wellbeing. The City of Lancaster's internal operating funds will be used to supplement the costs of the Proactive Housing Code Enforcement Program, the Neighborhood Crime Reduction through Police Social Workers Program, and the Public Service City Project Manager.

The CDBG funds used for the Small Business Development (Microenterprise Development) program represents less than 5% of their total program budget (the majority of their budget is comprised of privately raised funds). The Fair Housing Services Program also receives private funds, in addition to state and local funds, and County CDBG assistance.

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

Publicly owned property will be used to host several core programs that directly address the needs identified in this plan; specifically, City Hall (120 North Duke Street - owned by the City of Lancaster) hosts the City's Proactive Housing Enforcement Programs, Critical Repair Program, Lead Hazard Control Program, the Place-Based Streetscape Improvement management, the Health and Housing Social Worker, and Community Development staff. Further, the Bureau of Police will be used to host the Neighborhood Crime Reduction through Police Social Worker program.



## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

**Table 6 - Goals Summary Information**

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Maintain Affordable, Good Quality Housing	2021	2025	Affordable Housing	LANCASTER CITY	Maintain Affordable, Good Quality Housing	CDBG: \$698,000	Rental units rehabilitated: 10 Household Housing Units Homeowner Housing Rehabilitated: 10 Household Housing Units Housing Code Enforcement/Foreclosed Property Care: 600 Household Housing Units
2	Increase Affordable Housing Opportunities	2021	2025	Affordable Housing	LANCASTER CITY	Increase Affordable Housing Opportunities	CDBG: \$163,551	Other: 2 Other
3	Promote Neighborhood Quality of Life	2021	2025	Non-Housing Community Development	LANCASTER CITY	Promote Neighborhood Quality of Life	CDBG: \$465,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 105 Households Assisted
4	Expand Economic Opportunities	2021	2025	Non-Housing Community Development	LANCASTER CITY	Expand Economic Opportunities	CDBG: \$20,000	Businesses assisted: 20 Businesses Assisted
5	Homeless Services	2021	2025	Homeless	LANCASTER CITY	Support Homeless Services	CDBG: \$0 ESG: \$0	As the City did not receive an ESG allocation this Fiscal Year, this goal will be supported through collaboration with the Lancaster County Homelessness Coalition

## Goal Descriptions

1	<b>Goal Name</b>	<b><i>Maintain Affordable, Good Quality Housing</i></b>
	<b>Goal Description</b>	The City is dedicated to maintaining affordable, good quality housing for all of its residents, particularly those with low- and moderate-incomes. In 2022, this housing goal will be carried out through the City's Proactive Housing Code Enforcement Program, Critical Repair Program, and the administration of the Critical Repair and Lead Hazard Control Programs. These programs have served the community and made significant impact to the improvement of its affordable housing stock, health, and wellbeing over the course of many years. They are a strength in the City's programming and continuing to support them with CDBG dollars is in the community's best interest.
2	<b>Goal Name</b>	<b><i>Increase Affordable Housing Opportunities</i></b>
	<b>Goal Description</b>	The City is committed to exploring and investing in opportunities to increase affordable housing opportunities for its residents. In 2022, the City will be leveraging funding from various Federal, state, and local sources to develop and implement community-oriented solutions to the City's affordable housing shortage. Solutions may include, but are not limited to, construction of new housing, acquisition, and/or rehabilitation of existing housing for sale or rent to low- and moderate-income households, and/or homeownership assistance to create affordable housing opportunities for eligible City households with low- and moderate-incomes.
3	<b>Goal Name</b>	<b><i>Promote Neighborhood Quality of Life</i></b>
	<b>Goal Description</b>	In 2022, the City will continue to further its objective to promote and improve neighborhood quality of life for all of its residents through developing a well-rounded, resident-lead strategy to address the myriad of factors creating inequitable living conditions by implementing and funding neighborhood-centric programming to sustain a strong livelihood for its residents. The City's current strategies include the Place-based Streetscape Improvement Program, the Fair Housing Services Program, and funding multilevel public service programs such as the Department of Neighborhood Engagement's Project Manager Program, the Neighborhood Crime Reduction through Police Social Worker Program, and the Health & Housing Social Worker programs.
4	<b>Goal Name</b>	<b><i>Expand Economic Opportunities</i></b>
	<b>Goal Description</b>	The City recognizes that an essential aspect of a healthy community is economic wellbeing. As such, it is working to create economic opportunities for its residents by funding sustainable projects and businesses that empower our community with the resources, knowledge, and education to build and achieve financial stability.
5	<b>Goal Name</b>	<b><i>Support Homelessness Services</i></b>
	<b>Goal Description</b>	The City is dedicated to supporting individuals experiencing homelessness by providing solutions that include outreach, emergency shelter, and rapid rehousing support services. As the City did not receive an ESG allocation this year, this goal will be supported by an external collaboration with the Lancaster County Continuum of Care and Homelessness Coalition.

**2022 Planned Projects**  
**AP-35 Projects - 91.420, 91.220(d)**

**Introduction**

The City plans to implement the following projects in 2022, which have been designed to fit within the goals, objectives, and needs identified within its 2021 - 2025 Five-Year Consolidated Action Plan.

#	Project Name
1	2022 CDBG Program Administration
2	The Fair Housing Services Program
3	Critical Repair and Lead Hazard Reduction Program Administration
4	City Planning
5	The Critical Repair Program
6	Proactive Housing Code Enforcement
7	Affordable Housing Development Solutions
8	Place-based Streetscape Improvements
9	Public Service City Project Manager
10	Neighborhood Crime Reduction Through Police Social Worker Program
11	Health and Housing Social Worker Program
12	Small Business Development (Microenterprise Development)

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

In 2022, the City has allocated 52.83% of its CDBG funding towards maintaining affordable, good quality housing and increasing affordable housing opportunities, 28.51% toward improving neighborhood quality of life and 1.23% toward expanding economic opportunities. These percentages are designed to reflect our findings from community needs assessments consistently identifying housing as the City's most pressing need and our 2021 community priority poll in which community members weighed in on what priority needs they felt needed to be addressed in order for our community to thrive.

**Project Summary Information**  
**AP-38 Project Summary**

<b>1</b>	<b>Project Name</b>	<b>2022 CDBG PROGRAM ADMINISTRATION</b>
	<b>Target Area</b>	City of Lancaster, PA
	<b>Goals Supported</b>	Maintain Affordable, Good Quality Housing Increase Affordable Housing Opportunities Promote Neighborhood Quality of Life Expand Economic Opportunities Support Homelessness Services
	<b>Needs Addressed</b>	Maintain Affordable, Good Quality Housing Increase Affordable Housing Opportunities Promote Neighborhood Quality of Life Expand Economic Opportunities Support Homelessness Services
	<b>Funding</b>	CDBG: \$234,235
	<b>Description</b>	This project will cover the direct and indirect administrative costs of administering the CDBG program. Costs include salaries, fringes, space rental, audit costs, office supplies, and other administrative costs.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not applicable.
	<b>Location Description</b>	City of Lancaster, PA
	<b>Planned Activities</b>	See description.
<b>2</b>	<b>Project Name</b>	<b>THE FAIR HOUSING SERVICES PROGRAM</b>
	<b>Target Area</b>	City of Lancaster, PA
	<b>Goals Supported</b>	Maintain Affordable, Good Quality Housing Increase Affordable Housing Opportunities Promote Neighborhood Quality of Life Support Homelessness Services
	<b>Needs Addressed</b>	Maintain Affordable, Good Quality Housing Increase Affordable Housing Opportunities Promote Neighborhood Quality of Life Support Homelessness Services
	<b>Funding</b>	CDBG: \$20,000

<b>Description</b>	In 2022, the City of Lancaster will continue to support the Fair Housing Services Program. This program receives CDBG Administrative funds to address impediments identified in the 2021 Analysis of Impediments to Fair Housing Choice. The Fair Housing Services Activity promotes the provision of fair and equal housing opportunities in the City of Lancaster regardless of a person's race, color, religion, age, sex, ancestry, national origin, disability, or familial status in accordance with City, County, State, and Federal Fair Housing and Landlord Tenant laws. This will be accomplished through education, outreach, training and technical assistance to address impediments identified in the 2021 Analysis of Impediments to Fair Housing Choice. \$20,000 of the City's 2022 CDBG dollars will be committed to help fund this program from July 1, 2022 to June 30, 2023. Through this project, Tenfold's Housing Rights and Resources Center (HRRC) will further Lancaster's fair housing provision by providing education, mediation, outreach efforts, and support services to landlords and tenants in relation to Fair Housing law and landlord/tenant issues to eliminate barriers to fair housing opportunities in the area.
<b>Target Date</b>	6/30/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	At least 80 rental households at risk of eviction or in conflict with their landlord will benefit from this activity through outreach, education, mediation, and resolution efforts relating to Fair Housing rights and responsibilities.
<b>Location Description</b>	Tenfold's Housing Rights and Resource Center (HRRC) and other community locations within the City of Lancaster as needed during project implementation.

	<b>Planned Activities</b>	<p>The City anticipates that Tenfold will undertake the following activities, at a minimum, to further the goals of this project:</p> <ol style="list-style-type: none"> <li>1. Provision of two (2) Fair Housing trainings in partnership with PHFA and other agencies.</li> <li>2. Creation and distribution of a digital bi-annual publication that contains Fair Housing information.</li> <li>3. Provision of technical assistance on Fair Housing issues including facilitating mediations and submission of Fair housing complaint questionnaire to the proper city and/or state enforcement entities.</li> <li>4. Distribution of the Landlord &amp; Tenant Guide in print and electronically.</li> <li>5. Provision of consultation and advocacy on issues related to Fair Housing and its close relationship to Landlord/Tenant issues.</li> <li>6. Consultation and collaboration with City and State Fair Housing enforcement entities</li> <li>7. HRRC is working with local disability organizations to explore creation of housing opportunities that will increase housing choice for this community.</li> <li>8. Provision of informational presentations on Section 811 Project Rental Assistance (a program developed to provide low to moderate income individuals with disabilities access to quality housing) to City housing providers as a viable option of expanding/increasing the availability of 811 units throughout the city.</li> <li>9. Hosting of one (1) Housing Summit providing fair housing information, in partnership with local agencies – format and date contingent on COVID-19 safety measures.</li> <li>10. Provision of Fair Lending information to consumers through homebuyer classes.</li> <li>11. Hosting of one (1) Fair Lending network event for City lending institutions – format and date dependent on COVID-19 restrictions and safety measures.</li> <li>12. Working with local immigrant and resettlement organizations to ensure these populations understand their fair housing rights and that their rights are not being infringed upon.</li> <li>13. Distribution of the Landlord &amp; Tenant Guide in print and electronically in multiple languages.</li> <li>14. Utilization of telephonic language lines to serve consumers with varying language needs.</li> <li>15. Utilization of American Sign Language (ASL) video interpreting service for consumers in need of this service.</li> </ol>
3	<b>Project Name</b>	<b>CRITICAL REPAIR AND LEAD HAZARD CONTROL PROGRAM ADMINISTRATION</b>
	<b>Target Area</b>	City of Lancaster, PA
	<b>Goals Supported</b>	Maintain Affordable, Good Quality Housing
	<b>Needs Addressed</b>	Maintain Affordable, Good Quality Housing
	<b>Funding</b>	CDBG: \$215,000

	<b>Description</b>	<p>This project will help cover administrative costs of the City Lead Hazard Control Program and Critical Repair Program in 2022.</p> <p>The City's Lead Hazard Control Program provides risk assessments and financial assistance to income-qualified homeowners for the purpose of reducing or eliminating lead hazards. The work performed is determined by the results of the Risk Assessment and may include repairs to items such as doors, windows, and floors. Licensed and certified contractors will use interim controls and abatement methods when performing the work. The program does not make the property lead-free, instead the property will be considered lead safe. The City of Lancaster will successfully make 500 housing units lead-safe over a 60-month period. The Healthy Homes Supplemental Funding also enables the City to address other health hazards; such as radon, mold, and tripping hazards; in a targeted 120 homes.</p> <p>The Critical Repair program provides financial and technical assistance for the critical repairs of eligible, owner-occupied, single family housing units in the City of Lancaster. Financial assistance provided to very-low and low-income residents will be provided in the form of a grant. Often times, eligible properties are identified through the Lead Hazard Reduction Program applicants. Bureau of Lead Safety and Community Development staff and/or a City Inspector inspect each property to determine the severity. Types of repairs may include: water heaters, broken sewer pipes, non-operable furnaces, roof repair/replacement, structural problems, plumbing and/or, electrical.</p>
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City estimates that at least 10 rental household units and 10 owner-occupied household units will be served through this activity in 2022 for a total benefit to at least 20 low- and moderate -income households.
	<b>Location Description</b>	City of Lancaster, PA
	<b>Planned Activities</b>	Administration of the Critical Repair and Lead Hazard Control Programs in accordance with 24 CFR 570.202(b)(9). Program delivery costs may include staff, other direct costs, and service costs directly related to carrying out housing rehabilitation activities.
<b>4</b>	<b>Project Name</b>	<b>CITY PLANNING</b>
	<b>Target Area</b>	City of Lancaster, PA
	<b>Goals Supported</b>	Maintain Affordable, Good Quality Housing Increase Affordable Housing Opportunities Promote Neighborhood Quality of Life Expand Economic Opportunities
	<b>Needs Addressed</b>	Maintain Affordable, Good Quality Housing Increase Affordable Housing Opportunities Promote Neighborhood Quality of Life Expand Economic Opportunities
	<b>Funding</b>	CDBG: \$50,000

	<b>Description</b>	The purpose of this project is to support the City in conducting planning activities which may consist of data gathering, studies, analysis, and preparation of plans and the identification of actions that will implement resultant plans in accordance with 24 CFR 570.205.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A - Admin Activity
	<b>Location Description</b>	City of Lancaster, PA
	<b>Planned Activities</b>	TBD
<b>5</b>	<b>Project Name</b>	<b><i>THE CRITICAL REPAIR PROGRAM</i></b>
	<b>Target Area</b>	City of Lancaster, PA
	<b>Goals Supported</b>	Maintain Affordable, Good Quality Housing
	<b>Needs Addressed</b>	Maintain Affordable, Good Quality Housing
	<b>Funding</b>	CDBG: \$125,000
	<b>Description</b>	In 2022, the City will continue to provide CDBG funding to support its Critical Repair Program. The Critical Repair program provides financial and technical assistance for the critical repairs of eligible, owner-occupied, single family housing units in the City of Lancaster. Financial assistance offered to very-low and low-income residents will be provided in the form of a grant. Often times, eligible properties are identified through the Lead Hazard Reduction Program applicants. Bureau of Lead Safety and Community Development staff and/or a City Inspector will inspect each property to determine the seriousness and provide advisement regarding the critical repairs necessary to rectify health and safety concerns. All repairs need to be deemed as an emergency by the inspector. Types of repairs may include but are not limited to: water heaters, broken sewer pipes, non-operable furnaces, roof repair/replacement, structural problems, plumbing and/or, electrical repairs.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The Critical Repair Program will assist 10 low- and moderate-income, owner-occupied, single-family households in the City of Lancaster.
	<b>Location Description</b>	Any eligible property in the City of Lancaster, PA.
	<b>Planned Activities</b>	<ul style="list-style-type: none"> <li>• Financial and technical assistance for the critical repairs of eligible, owner-occupied, single family housing units in the City of Lancaster.</li> <li>• All repairs need to be deemed as an emergency by the inspector.</li> <li>• Types of repairs may include: water heaters, broken sewer pipes, non-operable furnaces, roof repair/replacement, structural problems, plumbing and/or, electrical.</li> </ul>
<b>6</b>	<b>Project Name</b>	<b><i>PROACTIVE HOUSING CODE ENFORCEMENT PROGRAM</i></b>
	<b>Target Area</b>	City of Lancaster
	<b>Goals Supported</b>	Maintain Affordable, Good Quality Housing
	<b>Needs Addressed</b>	Maintain Affordable, Good Quality Housing
	<b>Funding</b>	CDBG: \$358,000



	<b>Description</b>	The Proactive Housing Code Enforcement Program is designed to improve the health and safety conditions of City homes to prevent deterioration of the City's housing stock, to help maintain affordable, good quality housing, and to stop the spread of blight, particularly in areas principally occupied by low-income persons through proactive systematic and complaint-based code enforcement actions. The City has committed \$358,000 of its 2022 CDBG dollars to help fund this program which will also leverage City general fund dollars, allowing this activity to continue to operate proactively to address the City's critical health-related housing issues. In 2022, this service will contribute to the preservation and improve the quality of affordable housing with a focus on homes in low and very-low-income census tracts in some of City's income-constrained areas such as Census Tracts 9, 8, 10, 14, and 147.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 600 rental households will see proactive code enforcement benefits and be brought sufficiently up to the City's code enforcement standards through this activity.
	<b>Location Description</b>	60% of the proactive housing code enforcement work carried out by the City's Bureau of Property Maintenance and Housing Inspections in Code Inspector Sectors 3, 4, 5, 6, 7, 8, 9, and 10 will be supported through this CDBG funding.
	<b>Planned Activities</b>	Proactive code enforcement including systematic rental inspections, some complaint inspections, condemnations (when necessary) and owner-occupied exterior inspections.
<b>7</b>	<b>Project Name</b>	<b>AFFORDABLE HOUSING DEVELOPMENT SOLUTIONS</b>
	<b>Target Area</b>	City of Lancaster
	<b>Goals Supported</b>	Increase Affordable Housing Opportunities
	<b>Needs Addressed</b>	Increase Affordable Housing Opportunities
	<b>Funding</b>	CDBG: \$163,551
	<b>Description</b>	The City is prioritizing increasing affordable housing for its community members leveraging all resources available. The City has allocated \$163,551 in CDBG entitlement funding to use for furthering this effort in 2022, which will help supplement \$429,362 in remaining 2021 CDBG entitlement funding allocated to this project to help strengthen impact. In 2022, the City plans on utilizing a competitive process seeking eligible affordable housing development projects that may include activities such as construction of new housing, homeownership assistance, and acquisition and/or rehab of existing housing, for the purposes of increasing affordable housing opportunities for low- and moderate-income residents.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City will determine this metric as a result of the outcomes of the competitive proposal process to determine suitable and eligible housing projects.
	<b>Location Description</b>	City of Lancaster, PA
<b>8</b>	<b>Planned Activities</b>	TBD.
	<b>Project Name</b>	<b>PLACE-BASED STREETScape IMPROVEMENTS PROGRAM</b>

	<b>Target Area</b>	City of Lancaster, PA
	<b>Goals Supported</b>	Promote Neighborhood Quality of Life
	<b>Needs Addressed</b>	Promote Neighborhood Quality of Life
	<b>Funding</b>	CDBG: \$210,000
	<b>Description</b>	In 2022, CDBG entitlement funding will be allocation to support the City's Place-Based Streetscape Improvement Program which installs, improves, and repairs streets, street drains, storm drains, ADA curbs and gutters, sidewalks, crosswalks, streetscapes, and traffic lights/signs in neighborhoods where 51% or more of the residents are low- or moderate-income in an effort to improve and promote neighborhood quality of life and increase the economic viability and livability of socioeconomically disadvantaged areas of the City.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Activities supported by this project will serve a neighborhood of 500 households.
	<b>Location Description</b>	City of Lancaster, PA
	<b>Planned Activities</b>	Specific planned projects include: TBD
9	<b>Project Name</b>	<b>PUBLIC SERVICE CITY PROJECT MANAGER</b>
	<b>Target Area</b>	City of Lancaster, PA
	<b>Goals Supported</b>	Promote Neighborhood Quality of Life
	<b>Needs Addressed</b>	Promote Neighborhood Quality of Life
	<b>Funding</b>	CDBG: \$80,000
	<b>Description</b>	This project is designed to support the Department of Neighborhood Engagement (DoNE) in their efforts to improve the quality of life for our community through collaboration and the development of well-rounded, resident-lead strategies and increased collaboration between the community and City government through providing financial assistance for a DoNE Program Manager role. The purpose of this activity is to provide project management support for the City's core neighborhood engagement initiatives and activities in order to promote and enhance neighborhood quality of life.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project is designed to serve the entire City of Lancaster and at a minimum will provide support and assistance to a neighborhood comprised of at least 500 persons.
	<b>Location Description</b>	City of Lancaster, PA
	<b>Planned Activities</b>	Under this project, the DoNE's Program Manager provides support for the following community and resident-facing programs and activities: 1. Love Your Block Grants 2. Neighborhood Leadership Academy 3. PACE Program 4. City VISTA Program 5. Other City programs that further promote neighborhood quality of life

10	<b>Project Name</b>	<b>NEIGHBORHOOD CRIME REDUCTION THROUGH POLICE SOCIAL WORKER PROGRAM</b>
	<b>Target Area</b>	City of Lancaster
	<b>Goals Supported</b>	Promote Neighborhood Quality of Life
	<b>Needs Addressed</b>	Promote Neighborhood Quality of Life
	<b>Funding</b>	CDBG: \$80,000
	<b>Description</b>	In 2022, the City will continue to leverage CDBG funding to assist the Neighborhood Crime Reduction Through Police Social Worker Program in supporting a community-oriented, holistic policing program aimed at preventing crime through engagement and connection in order to proactively assist City residents in need by connecting them to appropriate social services or behavioral or mental health providers. This program will work to resolve issues related to homelessness, wellbeing, mental health, aging, housing, child welfare, and domestic violence. This has helped to improve police-led community outcomes and enhance neighborhood quality of life to the benefit of a predominately low- and moderate-income City area.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This activity will serve a neighborhood service area comprised of at least 500 persons.
	<b>Location Description</b>	City of Lancaster, Police Beats 1 – 6
11	<b>Planned Activities</b>	See description.
	<b>Project Name</b>	<b>HEALTH AND HOUSING SOCIAL WORKER PROGRAM</b>
	<b>Target Area</b>	City of Lancaster
	<b>Goals Supported</b>	Promote Neighborhood Quality of Life
	<b>Needs Addressed</b>	Promote Neighborhood Quality of Life
	<b>Funding</b>	CDBG: \$75,000
	<b>Description</b>	The Health and Housing Social Worker Activity is responsible for providing social service and housing support to the City of Lancaster's Community Planning and Economic Development Department (CPED) and members of the community through managing a caseload focused on addressing problems related to housing and resident health and wellbeing. In 2022, the Health and Housing Social Worker will continue to assist City-clientele in resolving persistent housing-related issues and in finding and securing affordable housing opportunities in the City while also addressing intersecting health issues impacting housing. This program acts as a liaison between the City and the various social service agencies by providing follow-up and case monitoring related to housing issues through a holistic, coordinated community response that connected clientele to a variety of agencies to address intersecting socioeconomic issues related to housing, as appropriate. This activity actively contributes to furthering the City's goals to utilize CDBG to promote neighborhood quality of life and to also increase access to affordable housing opportunities.
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	At least 25 low- and moderate-income City clientele will be directly served through this activity.
	<b>Location Description</b>	City of Lancaster
	<b>Planned Activities</b>	See description.
12	<b>Project Name</b>	<b><i>SMALL BUSINESS DEVELOPMENT (MICROENTERPRISE DEVELOPMENT)</i></b>
	<b>Target Area</b>	City of Lancaster
	<b>Goals Supported</b>	Expand Economic Opportunities
	<b>Needs Addressed</b>	Expand Economic Opportunities
	<b>Funding</b>	CDBG: \$20,000
	<b>Description</b>	In 2022, the Small Business Development Activity will offer small business training, mentoring, access to financial tools, and other technical assistance to lower-income City residents who wish to establish or expand microenterprise businesses through ASSETS Lancaster. Participants will attend business-oriented training courses and receive targeted technical skill building and coaching to create and implement sustainable microenterprise business models. Applicants successfully completing the ASSETS training will be eligible to apply for microenterprise loans and financial assistance through various local and State-supported funding mechanisms. All attendees will receive continuous technical assistance and support after training completion. This purpose of this program is to improve the economic development support and outcomes for low- and very-low-income persons seeking to start or expand small businesses in the City of Lancaster.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This activity will benefit at least 20 small businesses operated by or started by at least 20 low- and moderate-income City residents.
	<b>Location Description</b>	City of Lancaster
	<b>Planned Activities</b>	See description.

## Geographic Distribution

### AP-50 Geographic Distribution – 91.420, 91.220(f)

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

All funds will be utilized within the City of Lancaster. Projects that have direct beneficiaries will only serve low- and moderate-income households, while other programs will provide CDBG funds only in low- and moderate-income areas of the City.

#### Geographic Distribution

Target Area	Percentage of Funds
LANCASTER CITY	100%

#### Rationale for the priorities for allocating investments geographically

The City has prioritized investing its CDBG dollars in predominately low- and moderate-income areas of the City in order to infuse these neighborhoods with investment leading to socioeconomic revitalization, sustainability, and stability. It is imperative that low- and moderate-income households and areas receive financial and programmatic assistance through this HUD funding mechanism so as not to exacerbate vulnerabilities.

## **Homeless and Other Special Needs Activities**

### **91.420, 91.220(i)**

#### **Introduction**

In 2022, the City of Lancaster will work in coordination with the Lancaster County Homelessness Coalition which is the lead agency in charge of Lancaster's Continuum of Care (CoC) to support homelessness services.

#### **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:**

Homeless outreach workers provide street-based and shelter-based outreach to persons experiencing homelessness. These workers build relationships with persons experiencing homelessness and connect them with services.

Lancaster County began its coordinated assessment/single point of entry system, known as Community Homeless Assessment and Referral Team (CHART), in September 2013. CHART contracted with United Way 211 to provide initial client screening into the single point of entry system. CHART workers are mobile, allowing them to conduct face-to-face initial assessments to clients who are at emergency shelters, the daytime drop-in center, on the street or in other areas. Outreach Workers are trained to conduct CHART assessments. This decreases the number of contacts a client needs to work with the obtain the services they need.

CHART does the following:

- Ensures that households at imminent risk of homelessness get the right services at the right time and at the right level;
- Provides a single, trusted access point individuals and families can turn to for homeless prevention services, assessment, light case management and referral to emergency housing and other services to help get back on their feet;
- Focus on diversion and prevention whenever possible with shelter entry only when no other option or resource is available;
- Recognize that a successful SPE is dependent upon full provider buy-in; must have sufficient housing specialists, diversion and rapid re-housing resources; and must include permanent housing resource identification/referral at point of entry.

The City will work to support the County in achieving its 2022 goals related to homelessness. These goals are articulated in the County's 2022 Annual Action Plan.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons:**

The Lancaster County Homelessness Coalition continues to monitor the need of emergency and transitional housing. Emergency shelter that can be accessed by any family type is the highest priority to receive funding in 2022 because this is the biggest area of need in the community.

Current City Shelters include: Transitional Living Center (TLC) (overnight and day shelter), YWCA (overnight, for women), Women's Winter Shelter and St Mary's Church (overnight, operates during the winter months to help with overflow), Food Hub Emergency Shelter, hosted by Ebenezer Church (overnight) and the Water Street Mission (overnight). Each shelter provider has plans in place to respond

to emergency/urgent situations (such as COVID-19). Currently, they have ramped up cleaning of the facilities and have ensured that food is available to all individuals and families receiving services from the shelter. Outreach is continuing but using social distancing.

Along with the above-mentioned shelters, there are 28 other locations that offer food to those struggling with food insecurity. These services have adapted to emergency/urgent situations, offering on-site food services for those residing in shelters or being housed in hotels.

CHART assessments are also conducted before any individual or family can enter emergency shelter or transitional housing, except for those fleeing domestic violence. These assessments are designed to match each individual to the service that will best meet their core needs.

The City will work to support the County in achieving its 2022 goals related to homelessness. These goals are articulated in the County's 2022 Annual Action Plan.

**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:**

Rapid re-housing services are the primary method to make the transition to permanent housing and independent living for persons experiencing homelessness. Rapid re-housing helps chronically homeless individuals and families, families the children, veterans and their families to move out of homelessness and into permanent housing as quickly as possible. Tenfold operates two rapid re-housing activity program "Shelter To Independent Living Program" and "Community Housing Solutions."

The skills and disciplines taught through the provision of rapid rehousing case work services as well and the resources identified in each client's "Housing Plan" worked to prevent formerly homeless persons from returning to homelessness. Self-sufficiency is a primary goal of the program.

The City will work to support the County in achieving its 2022 goals related to homelessness. These goals are articulated in the County's 2022 Annual Action Plan.

**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 CoC works with the Lancaster County Children and Youth Agency (CYA) who established the Independent Living (IL) Unit to ensure that youth aging out of foster care are not discharged into homelessness. The IL Unit offers education and supportive services for ages 16-21. Staff members facilitate weekly groups about daily living skills such as budgeting, employment, and cooking; including an advanced group to address specific needs of older IL youth. Community volunteers mentor youth for

ongoing support as they access independent housing.

The Lancaster County Continuum of Care meets with publicly funded institutions to ensure proper discharge planning. The Lancaster County Re-Entry Management Organization (RMO) focuses specifically on citizens returning from corrections institutions and programs. Hospitals, county behavioral health, RMO, housing and other various social service providers are represented at the various levels of the Continuum of Care, including its Homeless Service Provider Network (front-line staff), Continuum of Care Planning Committee (management level staff). City and County staff participate at all levels of the Continuum of Care.

The City will work to support the County in achieving its 2022 goals related to homelessness. These goals are articulated in the County's 2022 Annual Action Plan.

DRAFT



## **Barriers to Affordable Housing**

### **AAP-75 Barriers to affordable housing -91.420, 91.220(j)**

#### **Introduction**

The City of Lancaster continues to seek and advance policy and programming to alleviate barriers to accessing affordable housing opportunities for residents and will utilize its 2022 CDBG entitlement allocation to assist in developing and implementing innovative and inclusive approaches to advance its affordable housing priorities.

In 2021, the City commissioned The Center for Regional Analysis to conduct study to develop a methodologically sound dataset for informing the design and implementation of policies and strategies to address the challenge of housing affordability and to identify pervasive barriers preventing residents from accessing and maintaining affordable housing in the City. The study, delivered in October of 2021 and entitled Housing Availability in the City of Lancaster and Implications for Housing Affordability, provided critical quantitative, supply and demand data and analysis laying the necessary contextual foundations from which to develop the City's affordable housing strategies, policies, and programming. The study contributed the following key findings about the City's housing affordability challenges:

- Finding 1: The City's housing affordability is impacted by supply and demand dynamics caused by a limited stock and broad spectrum of housing cost burden due to income disparity which create barriers to accessing affordable housing due to market-driven rental costs that are disproportionate to incomes.
- Finding 2: The City has a housing shortage of about 1,165 – 2,455 homes. This contributes to an increase in housing prices, which may cause housing instability and displacement for lower income residents, further aggravating of the City's housing affordability challenge.
- Finding 3: The type of housing available in the City does not meet the needs of the typical City household, generating further housing inequity in terms of housing cost burden for single income earners and small families. The City would therefore benefit from the production and addition of one- and two-bedroom units to its housing stock.
- Finding 4: The City faces limited opportunities to expand its housing supply due its highly residential nature. It should consider adopting transformative policies supporting extensive and deliberate redevelopment at a large scale to combat the housing shortage utilizing land use and zoning mechanisms and promoting rehabilitation and new construction.
- Finding 5: There is an unequal distribution of housing cost burden based on family size and income, creating further housing equity issues in the City. It is estimated that one-third of the City's households are housing cost-burdened with single, nonfamily households, comprising 40% of the City's households, bearing the bulk of this burden. This finding indicates that incomes are insufficient to meet the cost demands of the City's housing market, compounding the City's affordability challenge.

Equipped with the study's findings, the City is working diligently to create and implement solutions seeking to rectify these conditions to improve its affordable housing availability by leveraging all resources and mechanisms available, including CDBG, ARPA, HOME, HOME-ARP grant mechanisms, among other funding avenues.

In Program Year 2022, the City Lancaster will support and fund several activities aimed at reducing or eliminating barriers to fair housing for persons and households seeking to reside in the City, especially

those of low- and moderate-income, which will be explored in greater depth below.

**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 City recognizes the growing challenges in affordability and the need to develop an intentional, collaborative, and impactful housing affordability strategy, policies, and laws that diminish and remove barriers to access and availability. In 2022, the City is undertaking targeted, synergistic actions to remove and ameliorate the negative impact of public policies that function as access barriers to affordable housing opportunities for its residents through the following actions:

First and foremost, the City has developed and adopted an Interim Affordable Housing Strategy, informed by the aforementioned Housing Affordability Study, to direct its work to eliminate affordable housing impediments and to inform the direction and nature of land use and zoning changes to be proposed in the upcoming City Comprehensive Plan. Utilizing the core findings of the report, the City's Interim Housing Strategy has set the following goals and actions seeking to diminish the identified barriers to affordable housing in the City to be achieved by 2026:

**Goal 1:** *Produce approximately 2000 new units, 300 of which are affordable*

**Goal 2:** *Protect approximately 14,000 existing units, and improve 100+ units*

**Goal 3:** *Acquire approximately 200 units for affordability-focused redevelopment*

**Goal 4:** *Innovate to create approximately 100 new units*

**Goal 5:** *Sustain existing affordability and neighborhood vitality*

A copy of both the Housing Affordability Study and the City's Interim Housing Strategy are included as attachments to this plan.

The City is also in the process of finalizing its Comprehensive Plan which is reevaluating the City's approaches to land use, zoning, taxation, fees, building and housing codes, and other policies related to community, housing, and economic development in order to facilitate the development and provision of equitable public policies related to housing and promote the provision of improved affordable housing opportunities and improve community development.

Furthermore, the preservation and improvement of affordable housing in low- and very low-income neighborhoods is a long-term goal of the City. Achievement of this goal will continue to be promoted in 2022 through (1) continuous, proactive housing code enforcement by the staff of the City's CDBG-assisted "Proactive Housing Code Enforcement Program," (2) City housing rehabilitation efforts through its "Lead Hazard Control Program," to rehabilitate renter- and owner-occupied housing with detected lead hazards for low- and moderate-income residents, restoring the dwelling units to livable conditions and preventing them from being lost, and (3) the provision of financial and structural assistance to very low-, low-, and moderate-income City homeowners to remediate emergency home repairs through the "Critical Repair Program."

**Discussion**

In 2022, the "Proactive Housing Code Enforcement Program" will enable the City to implement a dynamic housing code enforcement approach designed to improve health and safety conditions in the homes of lower-income City residents, to help maintain affordable, good quality housing, to prevent deterioration

of the City's affordable housing stock, and to thwart the spread of blight, particularly in areas principally occupied by lower-income persons. This work will primarily focus on bringing rental properties successfully up to code to help improve the quality and safety of housing in predominately disadvantaged and deteriorating neighborhoods.

The City will continue to administer its "Lead Hazard Control Program" for households in Census Tracts 9, 10, 14, and 147 with high need to maintain the condition and integrity of their homes and protect against lead poisoning. The Project serves low- and moderate-income residents. The City will conduct this work through childhood lead poisoning prevention activities that identify children under the age of six that have lead-based paint poisoning or may be subject to lead hazards. The City will work to eliminate their health problems and to control and reduce lead paint hazards in the environment of its children. Lancaster will also continue to operate a "Critical Repair Program" to assist low and moderate-income homeowners facing emergency situations regarding some aspect of their home that is threatening their health, life, or wellbeing and which requires immediate attention and resolution. The Critical Repair Program addresses serious housing problems that cannot wait for the normal rehabilitation program process because of the immediate nature of the emergency. The intent of this project is to help lower-income persons or families remain in their affordable housing despite the occurrence of an otherwise insurmountable emergency. Examples of "critical" situations are when an aging heating system in a home is not properly functioning during cold weather and cannot be repaired, a leaking roof, or a broken sewage pipe that is causing sewage to back up into a house. In order to alleviate financial burdens for beneficiaries below 50% AMI, the Critical Repair program has adjusted its design to provide grants for emergency critical repairs in lieu of forgivable loans requiring liens to reduce the risk of aggravating economic injustice.

The City will also continue to implement the Health and Housing Social Worker activity (formerly entitled "Housing Social Worker") in 2022 to help reduce institutional and socioeconomic barriers to affordable housing by providing a dedicated affordable housing resource that works to connect City residents to better housing opportunities and provides support and education to assist residents in navigating the complex housing and supportive services policies and procedures to enable improved comprehension and access.

Further, the City provides Language Access services to its residents through a Language Access Coordinator to facilitate equitable information accessibility for the City's programs and initiatives to meet the language needs of our diverse City population. Additionally, the Health and Housing Social Worker provides bilingual English and Spanish support to further reduce access barriers to affordable housing. These actions, when combined, will help reduce institutional barriers to affordable housing in the City of Lancaster and demonstrate the proactive steps the City is undertaking to implement policies and programs that make affordable housing more available and accessible for all.

## Other Actions

### AP-85 Other Actions - 91.420, 91.220(k)

#### **Actions planned to address obstacles to meeting underserved needs:**

In 2022, the City plans to address obstacles to meeting underserved needs through the provision of strategic housing rehabilitation and development, public service, public infrastructure, and economic development activities focused on improving the wellbeing and living conditions for Lancaster residents, as detailed below:

- The Critical Repair and Lead Hazard Control Programs will focus on addressing the housing health, wellness, and viability of owner- and renter occupied units, lead-paint testing and remediation, and the preservation of the City's affordable housing stock.
- The Fair Housing Services will provide communal education and mediate issues between landlords and tenants to improve City residents' quality of life, their understanding of fair housing rights, and improve access to affordable housing opportunities and mechanisms.
- The City will provide various public service activities to increase access to and utilization of vital social services available in the City, including helping to fund a holistic, resident-centric Neighborhood Crime Reduction through Police Social Worker Program, a Health and Housing Social Worker dedicated to addressing multifaceted socioeconomic housing challenges of City residents, and a Public Service City Project Manager to improve the quality of life of our community through fostering intra-City collaboration, government transparency, and developing well-rounded, resident-led neighborhood strategies.
- The City will also provide neighborhood based public facility and infrastructure improvements in neighborhoods identified as having high service needs through its planned Place-based Streetscape Improvements Program.
- In 2022, the City plans on seeking proposed solutions and leveraging additional funding sources for the purposes of increasing affordable housing development opportunities for residents through its planned Affordable Housing Development Solutions CDBG activity, in coordination with other affordable housing funding sources such as HOME-ARP. Some solutions might include construction of new housing, homeownership assistance, and acquisition or rehabilitation of existing housing to create more affordable housing units in the City for residents of low- and moderate-income.
- The City is committed to expanding economic opportunities for Lancaster residents and will support the Small Business Development Activity in 2022, which will be aimed at improving the economic development services and outcomes for low- and very-low-income persons. This project will offer small business training, mentoring, access to financial tools, and other technical assistance to lower-income City residents who wish to establish or expand microenterprise businesses. Participants attend business-oriented training courses and receive targeted technical skill building and coaching to create and implement sustainable microenterprise business models.

The City's Critical Repair Program, Lead Hazard Control Program, and Healthy Homes Program all focus

on maintaining owner-occupied housing and addressing deferred maintenance for households under 80% Area Median Income (AMI). The City's Housing and Building Code Enforcement Programs will assist in ensuring the maintenance of housing, businesses, and buildings throughout the City (with a focus on the rental and business community who often struggle with quality and/or affordability). The City will also continue working with Spanish American Civic Association (SACA) Development Corp. and Partners with Purpose (both qualified Community Housing Development Organizations (CHDOs) in their development of affordable housing, particularly in the Southeast area of Lancaster City, which has a concentration of minority and low-income households, on various HOME-assisted initiatives detailed in Lancaster County's Consortium collaboration.

These programs enhance the livability of the property and provide vulnerable residents with an affordable method to stay in a stable, healthy living environment.

**Actions planned to foster and maintain affordable housing:**

The City's plans to implement activities focused on fostering and maintaining good quality, affordable housing, which is one of the primary objectives driving the allocation priorities of its Community Planning and Development funding.

Since the cost of preserving existing units as affordable often is less than the cost of creating a newly constructed affordable unit, the City will focus a large portion of its 2022 grant funding towards the preservation and maintenance of its affordable housing stock, especially in areas predominately occupied by low- and moderate-income persons and households. Preserving quality among our affordable housing stock also promotes housing stability for our residents. Combined, these factors make preservation a cost-effective strategy when grappling with the need for quality affordable housing in our community. Our community has an aging housing stock and is starting to see the effects of climate change. Without attention to property condition, residents are at risk of lead poisoning and other conditions that may adversely affect their health. They are also at risk of displacement. To help counter these challenges, the City will performance maintenance of affordable housing that will be carried out through the City's Proactive Housing Code Enforcement Program, Critical Repair Program, and City Lead Hazard Control Program to promote the provision of safe, high-quality housing to sustain the City's current housing stock.

Additionally, the community has an urgent need for increased affordable housing to support our low- and moderate-income households. According to the US Census (ACS 5-Year Estimate 2015 - 2019) an estimated 1,868 (or 19.47% of) Lancaster City homeowners and an estimated 5,805 (or 46.45% of) Lancaster City renters are housing cost burdened. The City will take concerted steps to support the provision affordable units, as laid out in its Interim Housing Strategy, which will include exploring and investing in opportunities to increase affordable housing for its community members. Solutions might include construction of new housing, homeownership assistance, and acquisition or rehab of existing housing for the purposes of increasing affordable housing. The Goal Outcome Indicators and Funding Allocations may shift and change as the City's team better learn the need and develop a viable strategy.

The City of Lancaster will also continue to work to support the Lancaster City Housing Authority in their provision of public housing in the City through acting as the Responsible Entity in the environmental review process in order to strengthen and further PHA service provision and goal achievement.

**Actions planned to reduce lead-based paint hazards:**

In 2022, the City of Lancaster will continue to administer its Lead Hazard Control Program that assists

eligible homeowners with reducing and/or abating lead hazards in their properties. This program has also been expanded to include rental properties.

In 2019, the City was awarded \$9.1M in Lead Hazard Reduction Grant through the U.S. Department of Housing and Urban Development, plus an additional \$700,000 of Healthy Homes Supplemental funding. These dollars will be used to systematically make 500 housing units lead-safe over five (5) years. The funding is enabling the City to scale up its existing Lead Hazard Control Program by hiring additional staff, including outreach workers. The target area encompasses four Census tracts (9, 10, 14, and 147) in the southern half of the City where 16,000 residents live. 61.5% of houses in the focus area were built prior to 1940 and lead-based paint is most likely present in the majority of households within the target area. Over 60% of families in the target area have low incomes and 82.6% of the population is a minority (including 58.6% Hispanic), meaning that this is a problem that is disproportionately affecting the City's most vulnerable populations. Over the next five years, the City of Lancaster will successfully make 500 housing units lead safe. The Healthy Homes Supplemental Funding is also allowing the City to address other health hazards (such as radon, mold, and tripping hazards) in 120 homes. In 2022, the City will eliminate a lien requirement for properties in the program to promote and ensure equitable access for landlords and tenants.

Additionally, the City conducted a community and stakeholder engagement process in Fall of 2021 to develop and update the City's Lead Hazard Control ordinance, which was passed by City Council in April of 2022.

**Actions planned to reduce the number of poverty-level families:**

In 2016, the Mayor's Commission to Combat Poverty released *One Good Job, A Strategic Plan to Cut Poverty in Half in Lancaster City by 2032*. The plan includes recommendations to reduce poverty in four (4) distinct areas: Workforce, Education, Housing & Community. Additionally, the Mayor's *Block by Block* Strategic Plan identifies a "Sustainable Economy" as a cornerstone of the City's long-term development and seeks to create and maintain sustainable employment opportunities in the City and support family-sustaining jobs that allow residents to grow and thrive as a measure to combat poverty.

In 2022, the City will continue its work to address pervasive housing and socioeconomic issues perpetuating generational poverty for low- and moderate-income families by designing and implementing HUD-assisted programming to further its strategic goals and decrease the prevalence of inequity and incidences of poverty. The following CDBG programs represent actions that City will take in 2022 to ameliorate intersecting conditions and issues sustaining poverty for the City's most vulnerable households in order to enact the necessary transformational change:

1. *The Critical Repair and Lead Hazard Control Programs:* Specifically directed towards benefitting very low-, low-, and moderate-income households and homeowners, in an effort to preserve assets, increase property values, and maintain quality, safe affordable housing by providing the support necessary to address lead hazards and conduct emergency critical repairs at homes within the City's most poverty-stricken neighborhoods.
2. *The Health and Housing Social Worker Activity:* This activity assists City residents in accessing affordable housing opportunities and provides the necessary support in helping to rectify and resolve corresponding social and health related issues negatively impacting housing stability in such a way that seeks to diminish housing insecurity created by poverty.

3. *The Proactive Housing Code Enforcement Activity:* Proactive code enforcement efforts aimed at alleviating unhealthy and unsafe housing and building conditions in socioeconomically challenged areas of the City in an effort to maintain access to high quality, safe, and affordable housing to combat housing inequality and housing cost burden.
4. *The Fair Housing Services Activity:* Furthering the provision and accessibility to quality, safe, and affordable housing through Fair Housing rights outreach, education, and support to reduce and help eliminate housing-based discrimination feeding the cycle of poverty.
5. *The Small Business Development Activity:* Business education, training, mentoring, access to financial tools, and other technical assistance offered to lower-income City residents who wish to establish or expand microenterprise businesses.
6. *The Affordable Housing Development Solutions Activity:* This activity will seek to facilitate solutions to the City's affordable housing shortage by collaborating with community service providers and developers to identify and implement housing projects that improve access to and availability of affordable housing for income-constrained City households to alleviate housing cost burdens that contribute to the perpetuation of poverty.

These activities, when combined, represent intersecting efforts to create solutions to rectify communal experiences of poverty through housing, community, and education-focused interventions.

**Actions planned to develop institutional structure:**

The Department of Community Planning and Economic Development (CPED) assists with many efforts to overcome gaps in the institutional structure of the service delivery system in the City. Foremost, CPED is the result of a restructuring to increase the availability and accessibility of programs and services targeting low- and moderate-income persons and neighborhoods as well as to advance overall community and economic development goals.

The City recognizes that challenges with institutional structure must be resolved through a collaborative approach across all community stakeholders. Coalitions, partnerships, and networks that facilitate the exchange of information and ideas will continue to be enhanced across all sectors of the community. For example, in 2021 the City stood up a Department of Neighborhood Engagement to provide an official institutional structure to encourage and strengthen community collaboration and create accessible opportunities for dialogue, learning, partnership, civic leadership building, and action between the City government and neighborhood residents to improve City quality of life.

Furthermore, in 2021 the Mayor implemented a citizen-oriented Block by Block Strategic Plan that seeks to further the provision of "Sound Government" as a major pillar. This effort is grounded in the building of structural processes and systems that foster government accessibility, accountability, and transparency to create equitable laws and policies driven by data-informed, citizen-oriented decision making at all levels. In 2022, CPED representatives actively participate on a variety of committees and boards to enhance intra-City collaboration, communication, and relationship-building to continue to develop institutional structures. This involvement helps the City to understand its role and responsibilities. These collaborative entities include:

- Lancaster City Alliance
- Community Action Partnership of Lancaster County

- Redevelopment Authority of the City of Lancaster
- Lancaster County Coalition to End Homelessness
- Lancaster County HOME Consortium
- Lancaster County Behavioral Health & Development Services Advisory Board
- Emergency Food and Shelter Program (Local Board)
- SACA Development Corporation (a qualified CHDO)
- SoWe: Southwest Neighbors
- Elm Street Revitalization Program for Southeast Lancaster

From 2021 – 2025, the City has sought and will continue to seek to achieve the following goals regarding Lancaster’s institutional structure:

1. Strengthen existing public/private partnerships and create new ones to implement programs and deliver services of all types.
2. Promote citizen participation as the cornerstone of every planning process.
3. Create interactive community information systems at the city and neighborhood levels.
4. Create community indicators and benchmarking programs to measure the success of public and private programs and policies.
5. Provide public education and encourage public awareness regarding issues that affect all City residents, but primarily person of low and very low income.
6. Customize housing information and technical assistance.
7. Maximize existing City programs that provide homeownership and rental assistance.
8. Support advocacy and planning activities with organizations whose primary mission relates to the provision of housing for low- and very low-income households.

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

In effort to enhance community coordination, in 2022 City employees will continue to sit on various boards and committee whose memberships provide a network that spans private housing and social service agencies – such as Tenfold, Lancaster County Behavioral Health and Development Services, Lancaster County Refugee and Immigrant Coalition, and the Lancaster County Homelessness Coalition. Further, the City’s Health and Housing Social Worker will continue to direct connection to public and private housing opportunities and provides coordination with supportive social services, as needed. The City will also facilitate continuous agency-level coordination between the Lancaster City Housing Authority, Lancaster County Redevelopment Authority, and the Coalition to streamline provision of affordable housing and supportive services.

The City is involved with SACA, which develops affordable housing for low- and moderate-income households. SACA also provides social services to seniors and others in the community and operates a workforce training facility. One Coalition in particular, the Lancaster County Homelessness Coalition, has made significant strides in enhancing coordination between community stakeholders. The Coalition is made up of a variety of social service, faith-based, mental health providers and housing agencies. While the main goal of the coalition is focused on ending homelessness, housing plays a key part in achieving that goal. The Coalition also allows for partnerships to be built and networking to be done between various agencies. The City will continue to play an active role within this coalition in 2022.

#### **Discussion**

In 2022, the City of Lancaster will continue to support the Fair Housing Services Program. This program is



carried out by Tenfold's Housing Rights and Resources Center (HRRC) which receives CDBG administrative funding to address and rectify pervasive impediments identified in the 2021 Analysis of Impediments to Fair Housing Choice through conducting the following activities:

1. Provision of two (2) Fair Housing trainings in partnership with PHFA and other agencies.  
Creation and distribution of a digital bi-annual publication that contains Fair Housing information.
2. Provision of technical assistance on Fair Housing issues including facilitating mediations and submission of Fair housing complaint questionnaire to the proper city and/or state enforcement entities.
3. Distribution of the Landlord & Tenant Guide in print and electronically.  
Provision of consultation and advocacy on issues related to Fair Housing and its close relationship to Landlord/Tenant issues.
4. Consultation and collaboration with City and State Fair Housing enforcement entities.  
HRRC is working with local disability organizations to explore creation of housing opportunities that will increase housing choice for this community.
5. Provision of informational presentations on Section 811 Project Rental Assistance (a program developed to provide low to moderate income individuals with disabilities access to quality housing) to City housing providers as a viable option of expanding/increasing the availability of 811 units throughout the city.
6. Hosting of one (1) Housing Summit providing fair housing information, in partnership with local agencies – format and date contingent on COVID-19 safety measures.
7. Provision of Fair Lending information to consumers through homebuyer classes.
8. Hosting of one (1) Fair Lending network event for City lending institutions – format and date dependent on COVID-19 restrictions and safety measures.
9. Working with local immigrant and resettlement organizations to ensure these populations understand their fair housing rights and that their rights are not being infringed upon.
10. Distribution of the Landlord & Tenant Guide in print and electronically in multiple languages.
11. Utilization of telephonic language lines to serve consumers with varying language needs.
12. Utilization of American Sign Language (ASL) video interpreting service for consumers in need of this service.

The City will also continue to ensure meaningful access to programs and activities by Limited English Proficient (LEP) persons. In 2019, the City of Lancaster implemented its Language Access Plan and hired its first-ever Language Access Coordinator to ensure the implementation and regulation of the Language Access Plan (attached). Federally funded programs carried out by the City (Critical Repair Program and the Lead Hazard Control Program) have documents and information available in both English and Spanish. The City will continue to work regularly with SACA which provides services to the Hispanic community.

SACA is also a CHDO and has received HOME funding to create and renovate affordable housing units. Further, Tenfold also offers first-time homebuyer classes and a down payment assistance program. Documents and classes are available in both English and Spanish.

The City of Lancaster is a part of the Lancaster County HOME Consortium. Please view the County's 2022 Annual Action Plan for a comprehensive understanding of how HOME funding is being utilized to address the identified Impediments to Fair Housing (2021).

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## Program Specific Requirements

### AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4)

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(l)(1)

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

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

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

#### Discussion

In 2022, the City of Lancaster estimates that it will utilize 100% of its CDBG funding for activities that benefit persons of low- and moderate-income.

Appendices

1 – CDBG 2022 Budget Summary.....53

2 – Certifications.....TBD

3 – HUD Forms.....TBD

4 – Citizen Participation Plan.....54

5 – Public Meeting and Proof of Publication.....67

6 – Public Meeting Attendance and Public Comment..... TBD

7 – City Council Resolution..... TBD

8 – Housing Affordability Study.....69

9 – Interim Housing Strategy.....90

10 – Language Access Plan.....100

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2022 Project/Activity	2021 - 2025 Consolidated Plan Goal	National Objective	Matrix Code	CDBG Category	2022 Funded Proposed for Public Comment
CDBG Program Administration	Planning & Admin	N/A	21A	Planning & Admin	\$ 180,000.00
City Planning			20	Planning & Admin	\$ 50,000.00
Fair Housing Services			21D	Planning & Admin	\$ 20,000.00
Indirect Admin			21B	Planning & Admin	\$ 54,235.00
Critical Repair and Lead Hazard Reduction Program Admininstration	Maintain Affordable, Good Quality Housing	Low/Mod Income: Clientele Benefit	14H	Housing	\$ 215,000.00
Critical Repair Program		Low/Mod Income: Clientele Benefit	14A	Housing	\$ 125,000.00
Housing Code Enforcement		Low/Mod Income: Area Benefit	15	Housing	\$ 358,000.00
Affordable Housing Development Solutions	Increase Affordable Housing Opportunities	TBD	TBD	Housing	\$ 163,551.00
Place-based Streetscape Improvement	Promote Neighborhood Quality of Life	Low/Mod Income: Area Benefit	03K	Public Facilities	\$ 210,000.00
Health & Housing Social Worker		Low/Mod Income: Clientele Benefit	05X	Public Services	\$ 75,000.00
Public Service City Project Manager (Neighborhood Engagement PM)		Low/Mod Income: Area Benefit	05M	Public Services	\$ 80,000.00
Neighborhood Crime Reduction through Police Social Worker Program		Low/Mod Income: Area Benefit	05I	Public Services	\$ 80,000.00
Small Business Development (Microenterprise Development)	Expand Economic Opportunities	Low/Mod Income: Clientele Benefit	18C	Economic Development	\$ 20,000.00
Proposed Grand Total					\$ 1,630,786.00

City of Lancaster, Pennsylvania  
Department of Economic and Community Development

**CITIZEN PARTICIPATION PLAN**

For the Federally-Funded  
FIVE-YEAR CONSOLIDATED PLAN AND  
THE ONE-YEAR ACTION PLAN

Encompassing the  
Community Development Block Grant (CDBG) Program  
Emergency Solutions Grant (ESG) Program

\*\*\*\*\*

**PURPOSE:** The purpose of Lancaster's Citizen Participation Plan is to encourage and enable the citizens of the City to participate in the development, implementation, and assessment of the City's five-year "Consolidated Plan" and its annual, one-year "Action Plan" encompassing the City's Federally-funded Programs (see Exhibit One for additional information regarding Lancaster's "Consolidated Plan").

The U.S. Department of Housing and Urban Development (HUD) requires that the City of Lancaster adopt a Citizen Participation Plan as a condition of eligibility for receiving Federal funds through the Community Development Block Grant (CDBG) Program and the Emergency Solutions Grant (ESG) Program (which are received through a competitive application process from the Commonwealth of Pennsylvania's Department of Community and Economic Development). Although these citizen participation requirements are designed especially to encourage participation by low- and very low-income persons, particularly those living in blighted areas and in areas where Federally-funded activities are proposed, the City of Lancaster is expected to take whatever actions are appropriate to encourage the participation of all its citizens, including minorities and non-English speaking persons as well as persons with mobility, visual, or hearing disabilities.

The Americans With Disabilities Act (ADA) of 1990 and Section 504 of the Rehabilitation Act of 1973 (as amended) are federal anti-discrimination statutes designed to remove barriers which prevent individuals with disabilities from enjoying the same opportunities that are available to persons without disabilities. One important opportunity is to attend and participate in public meetings scheduled by the City to provide information to citizens and to solicit their comments regarding actions to be taken by the City. Therefore, the City has established a policy of providing accommodations for persons with disabilities who wish to attend public meetings. Accordingly, all advertisements of public meetings to be conducted by the City include the statement that (1) the meeting will be held in a facility accessible to persons with disabilities, and (2) any persons with a disability who will require an accommodation of some type while attending the public meeting should notify the City in advance so that

the appropriate accommodations can be arranged. A voice phone number (291-4743), the City's TDD number (TDD 291-4761), and an email address are also provided in meeting advertisements.

The City of Lancaster and the County have Lancaster have entered into a consortium for the Home Investment Partnership (HOME) Program. The Lancaster County Housing and Redevelopment Authority (LCHRA) is the lead agency for this consortium, and all citizen participation regarding the City's HOME funds is administered by LCHRA.

## CITIZEN PARTICIPATION PLAN – REQUIRED ELEMENTS

### A. Citizen Involvement With Preparation of the Five-Year “Consolidated Plan” and Annual, One-Year “Action Plan”

Each year, beginning approximately seven months prior to the expected start of the Consolidated Grant Program year, the City of Lancaster will take the following steps to ensure that citizens of Lancaster, community-based organizations, private developers, governmental entities and others are aware of (1) the amount of federal assistance the City expects to receive each year through the CDBG Program through the Consolidated Plan, (2) the range of activities that may be undertaken through the Plan, (3) the focus on benefit to persons of low- and very low-income, and (4) the strategy to minimize displacement of persons and to assist any persons displaced.

Generally, because of reduced amounts of CDBG funds received by the City, an open application process does not occur. However, if the City receives enough funds to open an application process, the following two-phase procedure will be followed:

#### Phase One: Release of Funding Applications

Release of funding applications will occur in the context of community briefings and hearings. The City of Lancaster will require that all potential project sponsors, whether City agencies, private developers, non-profit corporations or other governmental agencies, prepare and submit a funding application prior to the announced deadline for such applications. Normally the application deadline will be on or about September 1 of each year, for activities expecting to receive funds under the Consolidated Grant Program starting January 1 of each year. The availability of funding applications will be advertised no less than 30 days prior to the submission deadline for such applications. The City will provide technical assistance to organizations in completing such applications.

#### Phase Two: Review Panel for Funding of Applications

The City of Lancaster will submit applications for funding from the Consolidated Grant Program to the "Grant Application Review Panel(s)" for critique and ranking for funding from available resources. The City of Lancaster will take account of the recommendations by Grant Application Review Panel members and will normally accept these recommendations for funding. However, the final determination regarding both the acceptance of an application and the actual funding amount awarded (which could be less than is requested) is reserved by the City of Lancaster as the entity ultimately responsible to HUD.

1. MEETINGS WITH THE MAYOR

At least two times per year, the Mayor of the City of Lancaster holds neighborhood quadrant meetings. These meetings are advertised in all media outputs, including television, radio, newsprint, the City Newsletter which goes to every house in the City, and to neighborhood groups. The meetings are held in 5 different locations around the City. This provides greater accessibility for those who live in different sections of the City. It also provides multiple meeting dates to be more accessible for citizens with differing schedules. At the meetings, citizens are informed about City projects and programs. The citizens are given the opportunity to ask questions and to share their comments and concerns with the Mayor. The Mayor shares this information with appropriate City staff, which is discussed and taken into consideration during plan development.

2. ANNUAL ACTION PLAN ADVERTISEMENT AND COMMENT PERIOD

A notice announcing the draft of the proposed Annual Action Plan is placed in the legal section of the local newspaper. This same notice appears on the City's website, where a draft of the plan is located electronically. Citizens may also visit City Hall to review a copy of the plan. Citizen questions are directed to the Department of Economic Development and Neighborhood Revitalization. A 30-day public comment period is provided. Citizens are asked to submit comments in writing, either by letter or by email. All comments are considered and included in the submission of the plan.

3. ANNUAL PLAN ADVERTISEMENT & PUBLIC HEARING PRESENTATION

The proposed Annual Action Plan, including recommendations for the funding of agencies and for the amount of funds to be allocated will be published community-wide for comment in the Lancaster Newspapers, and on the City's website, during the month of September. This announcement includes a notification of a public hearing, conducted in City Council Chambers concerning the proposed Action Plan and allocation of funds. A 30-day public comment period will be provided, starting from the date of the ad announcement. Copies of the Action Plan will be available to the public during the 30-day comment period, at City Hall and electronically on the City's website. All written comments received and all oral testimony at the public hearing will be recorded and made available as part of the Action Plan.



#### 4. OFFICIAL ADOPTION OF THE PLAN

The Five-Year Consolidated Plan or the annual, one-year "Action Plan," including all recommended funding allocations, will be submitted to City Council for consideration at the first City Council meeting in September. Council's role is to approve the submission of the "Action Plan" to the Federal Department of Housing and Urban Development (HUD).

#### 5. SUBMISSION OF THE PLAN TO HUD

The Consolidated Plan, on applicable years, and/or the Action Plan will be submitted to HUD 45 days prior to the start of the City's program year for Federally-funded activities on January 1. This period will ensure the timely processing and approval by HUD and thus to allow federal funds to be available in time for the start of the new program year.

#### 6. IMPLEMENTATION

Starting January 1 of each year the City will carry out the activities in the approved Five-year Consolidated Plan and the annual, one-year "Action Plan."

### B. Program Amendments

1. CDBG Program: This section concerns the examination of, appraisal of, and comment on proposed amendments to the CDBG Program during the Program Year which would result in a significant change in the use of program funds.

During the course of the City's Program Year, it may become necessary or desirable to amend the "Action Plan." The City will amend its Plan if it decides (1) not to carry out an activity described in the Final Statement, (2) to carry out an activity not previously described, or (3) to substantially change the purpose, scope, location, or beneficiaries of a project. Lancaster's criteria for substantial change is attached as Exhibit Two.

Prior to amending its Final Statement, the City provides citizens with reasonable notice of, and opportunity to comment on, any proposed changes in its use of funds via a paid advertisement in both daily newspapers. The City considers such comments and, if deemed appropriate, modifies the Program changes. The City will subsequently make available to the public, and submit to HUD, a description of any substantial changes adopted.

### C. Performance

1. Examination of, appraisal of, and comment on the City's "Consolidated Annual Performance and Evaluation Report" (CAPER) prior to submission to HUD.

The CAPER is a document produced annually by the City in narrative form and through the automated, "Integrated Disbursement and Information System" (IDIS) which provides a systematic format for reporting to HUD on the use of CDBG funds. The CAPER is also used to provide information to the citizens and officials of Lancaster City. In addition, it is part of HUD's review of CDBG Program grantees and Congress's review of the national CDBG Entitlement Program. Lancaster City must submit its Consolidated Annual Performance and Evaluation Report to HUD each year by the end of September (within 90 days after the close of the CDBG Year each December 31). However, before submitting the CAPER to HUD, availability of the Report for public review and comment must be made known to City residents. Copies must be made accessible to City residents in sufficient time to permit them to review and comment on the Report prior to its submission to HUD.

Accordingly, the City places an invitation for review and comment regarding the latest CDBG Program CAPER each year via paid advertisements in the Lancaster Newspaper, and on the City's website. The CAPER is advertised as available for review on the City's website and during working hours on specific days in the offices of the City Department of Economic and Community Development, located in the Municipal Building, 120 North Duke Street. A telephone number and email address are also provided to obtain information regarding the City's CAPER.

The City will conduct an annual public meeting, generally in March regarding the CDBG program, for citizens to review and comment on the performance of the program activities which occurred during the program year (January 1 thru December 31 of the prior year)

### D. Access to Consolidated Program Information Regarding the Use of Program Funds

At any time during the course of the program year, every citizen of Lancaster City has access to information related to the projects and activities being financed with funds from the current Program Year or from prior Program Years. Such information includes, but is not limited to, project contracts and budgets, financial reports, performance data, and participant information. The availability of program records is consistent with applicable State and local laws regarding privacy and obligations of confidentiality.

#### E. Emergency Solutions Grant (ESG) Application

The City of Lancaster competes for ESG funds from the Pennsylvania Department of Community and Economic Development (DCED). Prior to the expected announcement of the application process for ESG funds, the City will meet with current subrecipients of ESG funds, as well other agencies identified who wish to receive funds. The City and potential applicants will identify activities to be applied for, as well as potential funding requests when possible. The City will then meet with the lead agency of the Lancaster Continuum of Care (PA-510), for consultation of proposed activities and agencies included in the potential funding request. The City will then meet with the Continuum of Care Planning Committee and again present the proposed activities and agencies to be included in the application. Any comments or suggestions made by either the lead agency or the Continuum of Care Planning Committee will be taken into consideration for the design of the final application to DCED.

A notice announcing the application, the public comment period and the public meeting is placed in the legal section of the local newspaper. This same notice appears on the City's website, where a draft or a summary of the application is located electronically. Citizens may also visit City Hall to review a copy of the application, and a copy of the application is also available at the public meeting. Citizen questions are directed to the Department of Economic Development and Neighborhood Revitalization. A 30-day public comment period is provided, as long as the application release and the application deadline allow for a 30-day period. Citizens are asked to submit comments in writing, either by letter or by email. All comments are considered and included in the submission of the plan.

The application will be presented to City Council and will not be submitted to the DCED without the approval of City Council. City Council will be made aware of any citizen comments received during the comment period or public meeting. Citizens are also welcome to comment on the application during the public City Council meeting at which the application is presented. Comments will be considered prior to the submission of the application to DCED.

## Comments or Complaints Regarding the Consolidated Grant Program

Comments or complaints from individuals or organizations concerning the Consolidated Grant Program are responded to immediately or as soon as practicable by EDNR staff. Inquiries can be made by calling (717) 291-4743 (Voice) or (717) 291-4761 (TDY). Written inquiries should be addressed as follows:

City of Lancaster  
Federal Consolidated Grant Program  
Department of Economic Development and Neighborhood Revitalization

120 North Duke Street, PO Box 1599  
Lancaster, Pennsylvania 17608-1599

The City of Lancaster will consider any written comments or views from citizens, or made orally at the public hearings, in preparing the Consolidated Plan, Action Plan, or amendments to the Plan or CAPER. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be attached to the final Consolidated Plan, Action Plan, amendment to the Plan or CAPER. Complaints are answered in writing within 15 days of receipt by the City. Written complaints should be addressed as follows:

City of Lancaster  
Director,  
Department of Economic Development and Neighborhood Revitalization

120 North Duke Street, PO Box 1599  
Lancaster, Pennsylvania 17608-1599

### F. Amendments to the Provision of Information About Consolidated Program Public Hearing for Non-English Speaking Residents

The City will make available translation services for Spanish-speaking residents at the public meeting where views on neighborhood and City-wide needs are expressed. The City can provide translation services for Spanish-speaking residents who come into the Municipal Building to obtain program information.

### G. Furnishing Technical Assistance to Groups Regarding the Development of Program Proposals Representative of Low- and Very Low-Income Persons

The City's Department of Economic Development and Neighborhood Revitalization staff provides technical assistance to individuals or organizations regarding matters related to the completion and submission of Program Funding Application Forms to the City, when such forms are utilized. Technical assistance is offered via a cover letter (including the name and phone number of

a contact person) which is attached to every Program Project Funding Application Form. In addition, the City serves as a conduit for City-based organizations seeking other Federal or State grants to undertake projects addressing the Economic and Community Development needs of Lancaster City. These funds complement the funds received by the City through the Community Development Block Grant Program.

## Exhibit One

### City of Lancaster, Pennsylvania

Community Development Block Grant Program (CDBG)  
HOME Investment Partnership Program (HOME)  
Emergency Shelter Grant Program (ESG)

### UNDERSTANDING LANCASTER'S 'CONSOLIDATED PLAN'

The Federal Government of the United States has many programs operated by various departments through which it redistributes tax money to State, City, and County governments across the country. The purpose of redistributing tax money to these governments is to help them resolve or reduce physical, economic development, and social problems in their jurisdictions.

A primary source of Federal funds for State and local governments (including the City of Lancaster) is the Department of Housing and Urban Development (HUD). Major HUD formula grant Programs include (1) the Community Development Block Grant (CDBG) Program, (2) HOME Investment Partnership (HOME) Program, (3) Emergency Shelter Grant (ESG) Program, and (4) the Housing Opportunities for Persons With AIDS (HOPWA) Program. The City of Lancaster receives funds through the CDBG directly from HUD. HOME funds are received jointly with the Lancaster County Housing and Redevelopment Authority (LCHRA) as the City and County are operating under a limited consortium for the HOME Program. The County is responsible for the submission of the 5-year Consolidated Plan, as well as the submission of the Annual Action Plan as it relates to the HOME Program. The City creates and submits a separate Annual Action Plan for the CDBG Program. The City receives ESG Program Funds from the Pennsylvania Department of Community and Economic Development, through a competitive application process.

Each of these different HUD Programs previously required the preparation of separate annual plans with distinct citizen participation and other submission requirements. This disjointed planning process has been inefficient and time consuming, and considerable duplication of effort has occurred. To streamline the submission of documents, as well as coordinate planning, application and monitoring processes for its programs, HUD has initiated use of the Consolidated Plan. The Plan will help local governments, such as the City of Lancaster, to focus limited resources on broad community goals and objectives and to ensure that Federally-funded programs function in a coordinated manner.

The Consolidated Plan, a comprehensive planning document, will replace several separate documents now submitted to HUD by the City, including (1) the Comprehensive Housing Affordability Strategy (CHAS), (2) HOME Program Application, (3) Emergency Shelter Grant Program Description, and (4) CDBG Final Statement. The Consolidated Plan will be a document submitted annually to HUD by Lancaster that serves as the City's single planning document and application document for HUD funding under the CDBG, HOME, and ESG Programs. The City's Plan will cover the period from January 1 to December 31.

The three basic goals and related objectives to be addressed in Lancaster's Consolidated Plan (same as under the CDBG, HOME, and ESG Programs) are as follows:

Goal One: Provide Decent Housing

- Retain the affordable housing stock
- Increase the availability of permanent housing affordable to low-income persons
- Assist homeless persons to obtain affordable housing
- Increase supportive housing that includes structural features and services to enable persons with special needs to live in dignity

Goal Two: Provide a Suitable Living Environment

- Improve the safety and livability of neighborhoods
- Increase access to quality facilities and services
- Reduce the isolation of income groups within areas by expanding housing opportunities and revitalizing deteriorating neighborhoods
- Restore and preserve natural and physical features of special value for historic, architectural, or aesthetic reasons
- Conserve energy resources

Goal Three: Expand Economic Opportunities

- Create jobs accessible to low/moderate-income persons
- Provide access to credit for community development that promotes long-term economic and social viability

- Empower low/very low-income persons living in federally-assisted and public housing to achieve self-sufficiency

The joint Lancaster City and County five-year Consolidated Plan will create a unified strategy for community development and revitalization and promote partnerships among local institutions, nonprofit organizations, developers, community leaders, citizens and City officials. The process to develop the Plan will enable the City to bring together its needs and resources to develop and coordinate effective housing and community development activities. The five-year Consolidated Plan for Lancaster will contain a strategic plan which brings the needs and resources identified together into a unified, coordinated planning/ submission document. To develop a unified strategy, the City (with the assistance of citizens and community agencies) will undergo a comprehensive housing and community development self-analysis. As part of this analysis, the City will (1) inventory all of its resources, (2) identify its priority needs, (3) establish its housing and community development objectives, and (4) develop a coordinated strategy to achieve its objectives and resolve priority needs.

The City creates a one-year “Action Plan” that lists the activities the City will undertake during the next Program year using funds under the CDBG program for meeting housing and community development objectives. The one-year “Action Plan” will (1) describe the projects to be undertaken, (2) identify the location of each project, and (3) name the organization that will implement each project. A revised “Action Plan” will be developed during each year of the five-year Consolidated Plan period.

Citizen Participation will be a very important consideration in the formation of the City's Consolidated Plan and Action Plan. The City will adopt and implement a detailed “Citizen Participation Plan.” The public will have timely access to information relevant to the planning process. The City will make available to the public information regarding (1) the amount of Federal financial assistance that it expects to receive, (2) the range of activities that may be undertaken with the money, and (3) estimates of the number of persons expected to benefit from funded projects.

The “Citizen Participation Plan” will provide for technical assistance to citizen groups that request such assistance in developing proposals for funding under the programs covered in the Consolidated Plan. At least 30 days will be provided for public comment on the Plan before its submission to HUD.

Consultation with other organizations will also be an important aspect of Consolidated Plan formulation. The City will confer with public and private agencies that provide assisted housing, health services, and social services during the preparation of the Plan. Consultation will also occur with the Lancaster City Housing Authority concerning public housing needs and the Authority's planned Comprehensive Grant Program activities. In addition, the City will consult with adjacent units of government, particularly for problems and solutions that may go beyond a single jurisdiction.



Lancaster's Consolidated Plan must be reviewed and approved by HUD within 45 days of submission by the City. The Plan will be submitted to HUD by the City on November 15. The new Program Year will begin on January 1.

Two public hearings will be held concerning the Action Plan. The hearings will be conducted at three different stages in the Plan development process.

At the first public hearing, citizens will have the opportunity to review the City's proposed Action Plan, including identified housing and community development needs and the proposed use of Federal funds.

Later in the year, at a third public hearing, residents will have the chance to review program performance.

After the program year is complete, a second public meeting is held, where residents will have the chance to review program performance. The second public meeting is held prior to the submission of the Consolidated Annual Performance Evaluation Report (CAPER). All program activities carried out during the program year are included in the CAPER, and this public meeting allows citizens the opportunity to understand how federal funds were spent, and provide their feedback on program performance.

Lancaster's Action Plan must be reviewed and approved by HUD within 45 days of submission by the City. The Plan will be submitted to HUD by the City on November 15. The new Program Year will begin on January 1 and end December 31.

INTELLIGENCER JOURNAL, LANCASTER, PA.  
Friday, March 3, 1989

Legal Notice

Notice of CDBG Program Amendment Criteria

The City must amend its CDBG Program Statement whenever it decides to (1) carry out an activity not previously described in the Program Statement, (2) not carry out an activity described in the Statement, or (3) substantially change the purpose or scope, cost, location, or beneficiaries of a project activity as outlined in the most recent Statement.

A "substantial change" to a project activity is defined as a modification which changes the basic elements or characteristics of the project to the degree where it can be said that the project's "targeted beneficiaries" or geographic "service area" has been significantly altered in terms of the original purpose or scope of the project as described in the most current Statement.

A "substantial budgetary change" is defined as increasing or decreasing a project's original funding allocation by an amount greater than \$50,000 or 50 percent -- the lesser amount of money derived from these two calculations is the one used to determine whether or not a "substantial budgetary change" is being proposed. A "substantial budgetary change" is also defined as one where a series of cumulative budget amendments are made which increase the cost of a project by more than \$50,000 or 50 percent.

Prior to executing an amendment to its Statement, the City will provide citizens with reasonable notice of and an opportunity to comment on such proposed "substantial changes." The City will consider any comments and, if deemed appropriate, modify its proposed "substantial changes" prior to forwarding it to HUD.

**LNP MEDIA GROUP, Inc., P.O. Box 1328, Lancaster, PA 17608**

Account: <b>218465</b>	Ad ID: <b>4465682</b>
Client Type: <b>LT</b>	Description: <b>PUBLIC MEETING Notice of a Public Me</b>
Name:	Run Dates: <b>06/13/22 to 06/13/22</b>
Company: <b>CITY OF LANCASTER</b>	Class: <b>107</b>
Address: <b>HOUSING &amp; NEIGHBORHOOD REVI-</b>	Orig User: <b>KMCKILLIPS</b>
<b>TALIZATION</b>	Lines: <b>76</b>
<b>120 N DUKE ST, PO BOX 1599</b>	Agate Lines: <b>136</b>
<b>LANCASTER, PA 17608-1599</b>	Inserts: <b>1</b>

Other Charges:	<b>\$15.00</b>	Gross:	<b>\$391.96</b>
Discount:	<b>\$0.00</b>		
Surcharge:	<b>\$0.00</b>	Paid Amount:	<b>- \$0.00</b>
Credits:	<b>\$0.00</b>		
Bill Depth:	<b>9.764</b>	Amount Due:	<b>\$391.96</b>

Notes: 6/13

**PUBLIC MEETING  
Notice of a Public Meeting  
for the City of Lancaster's  
DRAFT 2022 ANNUAL  
ACTION PLAN**

The Public Meeting (Community Development Forum – Part 2) will take place at 6:00 PM on Thursday, June 30th, 2022, in Council Chambers at City Hall, 120 North Duke Street, Lancaster, PA 17608.

The purpose of this Public Notice is to announce that the City of Lancaster, PA will be hosting a PUBLIC MEETING, entitled Community Development Forum – Part 2, to review its Draft 2022 Annual Action Plan which details how the City plans to utilize Fiscal Year (FY) 2022 entitlement funding received from the Department of Housing and Urban Development (HUD). The purpose of this meeting is to facilitate and promote public awareness, feedback, participation, and to identify unmet needs as part of the City's planning processes for the 2022 Program Year. Specifically, this meeting will present how the City intends to use its FY2022 Community Development Block Grant (CDBG) entitlement funding and provide updates related to the City's Emergency Solutions Grant (ESG) entitlement funding.

A draft copy of the 2022

Annual Action Plan will be made available on the City's website in due course. Information about where to access the plan and the opening of the Public Comment Period will be announced in a forthcoming Public Notice.

All interested citizens residing in the City of Lancaster are welcome to attend this public meeting which will take place at 6:00 PM on Thursday, June 30th, 2022, in City Council Chambers at City Hall, 120 North Duke Street, Lancaster, PA 17608.

If you are a person who is mobility impaired or has language needs, please contact Brynn McGowan by email at [bmcgowan@city-of-lancasterpa.com](mailto:bmcgowan@city-of-lancasterpa.com) or telephone at (717) 291-4708 or Simone Dia at [sdia@city-of-lancasterpa.com](mailto:sdia@city-of-lancasterpa.com) or telephone (717) 291-4743 for special accommodations.  
Danene Sorace  
Mayor

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**LNP MEDIA GROUP, Inc., P.O. Box 1328, Lancaster, PA 17608**

Account: <b>218465</b>	Ad ID: <b>4467424</b>
Client Type: <b>LT</b>	Description: <b>PUBLIC NOTICE Notice of a Public Rev</b>
Name:	Run Dates: <b>06/18/22 to 06/18/22</b>
Company: <b>CITY OF LANCASTER</b>	Class: <b>107</b>
Address: <b>HOUSING &amp; NEIGHBORHOOD REVI-</b>	Orig User: <b>KMCKILLIPS</b>
<b>TALIZATION</b>	Lines: <b>72</b>
<b>120 N DUKE ST, PO BOX 1599</b>	Agate Lines: <b>129</b>
<b>LANCASTER, PA 17608-1599</b>	Inserts: <b>1</b>

Other Charges:	<b>\$15.00</b>	Gross:	<b>\$372.12</b>
Discount:	<b>\$0.00</b>		
Surcharge:	<b>\$0.00</b>	Paid Amount:	<b>- \$0.00</b>
Credits:	<b>\$0.00</b>		
Bill Depth:	<b>9.25</b>	Amount Due:	<b>\$372.12</b>

Notes: 6/18

**PUBLIC NOTICE**  
**Notice of a Public Review**  
**and Comment Period for**  
**the City of Lancaster's**  
**Draft 2022 ANNUAL**  
**ACTION PLAN (AAP)**  
The purpose of this notice is to announce that the City of Lancaster is accepting public review and commentary regarding its draft 2022 Annual Action Plan (AAP). The City's draft AAP describes how the City plans to utilize its Fiscal Year (FY) 2022 Community Development Block Grant (CDBG) entitlement funding from the Department of Housing and Urban Development (HUD). The plan also addresses updates related to the City's Emergency Solutions Grant (ESG) allocation for 2022.

A copy of the 2022 AAP is available on the City's website at: <https://www.cityoflanasterpa.com/departments/departments-of-community-planning-economic-development/health-housing-community-development-division/bureau-of-leads-safety-community-development/> under the "Documents & Resources" tab entitled "DRAFT 2022 Annual Action Plan" and at City Hall, 120 North Duke Street, Lancaster, PA 17602.

The City will accept citizen comments regarding the AAP for at least 30 days

(from June 18 to July 19). Persons interested in commenting on the AAP should contact the Department of Community Planning and Economic Development (CPED), Monday – Friday between the hours of 8:30 a.m. and 5:00 p.m. at the following:

Address: 120 North Duke Street (PO Box 1599), Lancaster, PA 17608-1599  
Phone: (717) 291 – 4708 or (717) 291 – 4743

E m a i l :  
BMcGowan@cityoflanasterpa.com or SDia@cityoflanasterpa.com.

If you are a person with language access needs, please contact Brynn McGowan or Simone Dia using the above information for special accommodations.

Danene Sorace  
Mayor

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# ***HOUSING AVAILABILITY IN THE CITY OF LANCASTER AND IMPLICATIONS FOR HOUSING AFFORDABILITY***

*PREPARED FOR:*  
**City of Lancaster, PA**

*PREPARED BY:*  
**Center for Regional Analysis  
at Economic Development Company  
of Lancaster County**

*FINAL REPORT:*  
**October 2021**

***HOUSING AVAILABILITY IN THE CITY OF LANCASTER AND  
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FINAL REPORT:

**October 2021**

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## KEY FINDINGS

The City of Lancaster commissioned the Center for Regional Analysis (CRA) to conduct an analysis of housing affordability in the rental market for wage earners.

The analysis relied on three key sources of data: (1) parcel data; (2) Census Bureau data and (3) the City's rental license database. Using these data sources, CRA analyzed the rental housing market from both the supply and demand sides to understand their relative importance in impacting housing affordability.

Five key insights emerged from the analysis.

### **FINDING #1.**

**Housing affordability is caused by demand and supply dynamics. Solutions need to address both.**

Implications:

- *On the supply side, housing stock acts as a constraint on the City's population growth.*
- *On the demand side, housing cost burden is wide-spread, largely a result of household incomes.*
- *The two dynamics act as barriers to market driven solutions. Shortage drives prices up, and incomes are not adequate to meet market prevailing rental rates.*

### **FINDING #2.**

**The City of Lancaster has a housing shortage.**

The City has approximately 24,300 housing units. The City's population is 22,100 households. This suggests

that 9% of the City's housing units (2,200) are vacant. This vacancy rate overstates the availability of housing supply. The housing estimate does not reflect several important factors such as: (1) how the housing stock is divided between rental and homeownership markets; (2) how quality reduces the housing supply; and (3) how well housing supply matches the needs of City residents. These factors contribute to more acute shortages in some markets and for some populations.

Data points:

- *The City has 22,100 households, occupying 91% of the City's housing stock. This suggests 9% or 2,200 of the City's housing units are not occupied. However, the Census Bureau estimates the City's housing vacancy rate is 2.2% in the homeowner market (220 unoccupied units) and 2.5% in the rental market (320 vacant units). This level of vacancy is very low. 5-10% is considered a healthy vacancy rate, suggesting the City needs an additional 1,165-2,455 housing units (660 to 1,388 in the rental market and 505-1,070 in the homeownership market).*

Implications:

- *Without significantly expanding the City's housing stock, the price pressure will continue to rise.*
- *This shortage, when coupled with the income profile of the City's current residents, amplifies the housing affordability challenge.*
- *Over the medium to long term, the implications of a sustained tight housing market are to either cause displacement (as a result of gentrification) or create incentives for housing stock to be run down (particularly in the rental market). More*



plainly, lower income residents may be priced out of the City's market and owners of rental properties will not feel market pressure to continuously invest in maintenance and capital improvements to preserve the property's appeal.

### **FINDING #3.**

#### **The City's housing stock does not align with the household composition of its residents.**

##### Data points:

- Over half of the City's housing stock (56%) is comprised of single-family dwelling, with 83% of these units having three or more bedrooms. In contrast, only 30% of the City's households have children under the age of 18.
- 22% of the City's housing units are estimated to have one bedroom, but 30% of the City's households live alone.

##### Implications:

- This misalignment likely exacerbates the aggregate housing shortage and housing cost burden – particularly for households with single income earners (which are the most economically vulnerable).
- To meet the current population's housing needs, the City's housing stock requires more one- and two-bedroom units.
- With an awareness that transforming the City's housing stock takes time, the City can respond to current demand and plan for future needs through policies that influence the type and size

of existing and future housing stock. For example, expanding the supply of multi-family dwellings and large apartment buildings (comprised of one and two bedrooms) will supplement housing for non-family residents. Increasing the availability of smaller single-family housing could better align with the size and composition of current and future families living in the City.

### **FINDING #4.**

#### **The opportunities to increase housing supply are limited.**

The City is highly residential. The extensive integration of housing throughout the City suggests that intentional redevelopment at a substantial scale is needed to ease or eliminate the housing shortage.

##### Data points:

- An estimated 88% of the City's parcels have some form of housing on it.

##### Implications:

- As long as there is demand – or interest – in living in the City, limited housing stock will place upward pressure on the cost of housing.
- The City needs intentionality in developing housing stock with a focus on large scale projects.
- Intentional development in combination with land use and zoning policy that facilitates housing density are critical to significantly increase housing availability. Small changes in zoning requirements will have limited potential to materially change the supply. Both the rehabilitation of existing low to

*moderate density housing units and building more medium and high density housing units where feasible are important.*

#### **FINDING #5.**

#### ***Housing cost burden is widespread reflecting the income profile of City residents.***

Median household income in 2019 was \$45,570. This level of income suggests monthly housing costs of \$1,140 (rent or mortgage) imposes a housing cost burden for half of the City's households. When considering that income distribution looks different based on household composition, the threshold is lower. Nearly 67% of the City's households are comprised of one individual or family with one head of household, suggesting they have a single income earner. Over half of these households (7,850 households) had annual incomes of less than \$35,000. For these households, the City's median rent of \$870 exceeds the 30% threshold. The net effect is that one-third of the City's households are housing cost burdened.

#### Data points:

- *According to US Census data, median household income in 2019 was \$45,570. However, income distribution varies significantly by household type: for families, \$57,800, and married couples, \$72,900; and for nonfamilies, \$33,200. Nonfamily households represent 40% of all households in the City.*
- *One-third of the City's households are housing cost burdened, and almost half of all renting households are estimated to pay at least 30% of their gross income to rent.*

- *Median rent is \$870 but varies across the City sections (\$795 in the Southeast Quadrant to \$975 in the Northwest Quadrant). An additional 20-35% of renters paid between \$1,000 and \$1,499 per month.*

- *Across sections of the City, the share of households burdened by housing costs ranges from 41% in the Northwest Quadrant to as high as 56% in the Southeast Quadrant.*

#### Implications:

- *The housing shortage is a challenge for a wide range of household incomes, not just the lowest income.*
- *Household incomes are not adequate to meet market rental rates.*

## **Conclusions**

Affordable housing in the City of Lancaster is a real challenge as a result of both supply and demand dynamics. This analysis starts with the view that housing is infrastructure. Its "fixed," physical nature requires longer time horizons to shape and expand it. In contrast, household demand is more adaptive and responsive, because households are mobile. A household's (potential) ability to move suggests that, at least in the short run, the quality, composition and quantity of housing drives the scale of demand (resulting in vacancies and price pressure). More research is needed to understand which segments of the population are most mobile and how housing choices are influenced by price and location. Nearly 80% of the City's

residents reported living in the same residence a year ago, suggesting that in any given year 20% of the population changed residence. Residential mobility varies across the City, largely correlated with the type of housing and prevalence of rental units.

With this in mind, conclusions emerge that impact the pathways for addressing housing in the City. They are as follows:

- *Many city households have incomes too low to afford prevailing rental rates without being housing cost burdened. The rental rates are driven by a range of factors. For new construction, particularly for apartment buildings, the rental rates reflect high fixed costs of land development and building construction. For older, multi-family housing which makes up a large portion of rental housing market, the rental rates generally reflect a scarcity of housing.*
- *Increasing housing supply could alleviate price pressure but would require a significant shift in supply. Absent potential to strongly raise incomes, increasing supply is a likely key market driver.*
- *Because housing stock requires such a substantial increase, the City has an opportunity to think critically about how it can transform housing to meet the needs of its residents and shape physical development in response to anticipated population growth in the metro region.*

# HOUSING STOCK

## Aggregate Supply

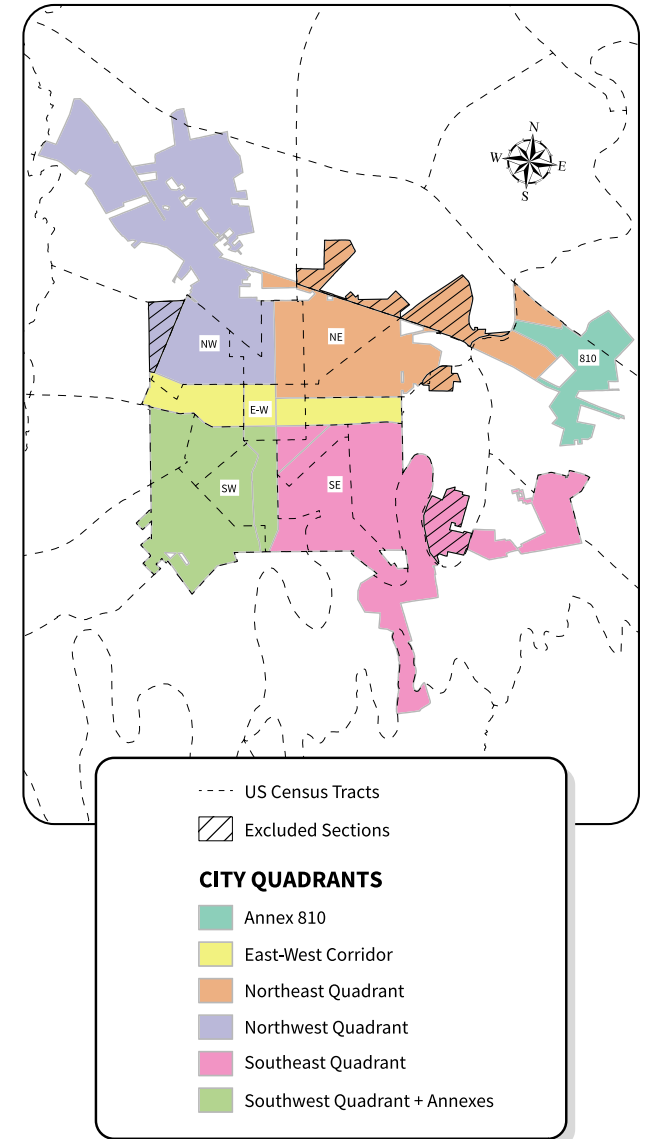
Lancaster City has nearly 18,300 parcels occupying 4,800 acres. Based on the County's land use categories, the vast majority of parcels are designated for residential purposes (88% or 16,040 parcels). From an acreage lens, residential land use accounts for less than one-quarter of the City's footprint.

To characterize the availability of housing in the City, the analysis divides the City into six sections (shown on the map). The sections divide the City into four quadrants plus an corridor that accounts for the "downtown" or business district and a satellite area. These sections are constructed using information in the County parcel data which divides the City of Lancaster into 12 areas (identified as wards and annexes).

## Type of Housing

The City's housing supply is varied in composition and distribution. This analysis categorizes housing units into several categories, ranging from single family buildings to multi-family buildings (on parcels zoned as residential) to apartments (which are mainly found on parcels zoned mixed use, commercial or retail). **Figure 2** summarizes how housing units are distributed across the housing categories and city sections.

Figure 1



**Figure 2**

TYPES OF HOUSING BY CITY SECTION							
HOUSING TYPE	ANNEX 810	E-W	NE	NW	SE + ANNEX	SW	TOTAL
SINGLE FAMILY	158	1,424	2,708	1,409	2,888	5,030	13,617
TWO-FAMILY		496	503	358	329	558	2,244
THREE-FAMILY		279	285	219	131	194	1,108
FOUR-FAMILY		114	153	120	53	45	485
FIVE+ FAMILY		204	176	63	38	52	533
CONDO		324	63	69	4		460
APARTMENT	213	1,032	938	878	1,570	1,128	5,759
OTHER 500*		14	5	35	13	45	112
<b>TOTAL UNIT COUNT</b>	<b>371</b>	<b>3,887</b>	<b>4,831</b>	<b>3,151</b>	<b>5,026</b>	<b>7,052</b>	<b>24,318</b>
<b>% OF HOUSING UNITS</b>	<b>2%</b>	<b>16%</b>	<b>20%</b>	<b>13%</b>	<b>21%</b>	<b>29%</b>	<b>100%</b>

### Single-family – Detached or Attached

Single family housing (detached or attached, such as row home or townhouse) represents the largest category of housing in Lancaster City. 56% of housing units fall into this category. Across the six sections of the City, this type of housing varies in concentration. The Southwest section of the City is dominated by single family housing (71%). The lowest concentration is found in the East-West Corridor (37%) which includes the City's downtown.

This type of housing tends to be larger in terms of the number of bedrooms. Over half are estimated to have three bedrooms. Another 18% have four bedrooms. Less than 20% are estimated to have two or fewer bedrooms.

### Multi-family Dwellings

This category captures housing on residential parcels where the building has multiple units, such as two- and three-family buildings or a detached single family house that has been broken up into several units. Housing in this category differs from apartments and condominiums. Apartments tend to be in buildings that are much larger than multi-family dwellings. Multi-family dwellings are different from condominiums given their ownership structure even though they may visually look similar. Multi-family dwellings have a one-to-many relationship for parcels to housing units. Condominiums have a one-to-one relationship between the parcel and housing unit. In other words, each condominium unit has its

own unique parcel number, while located in the same building with other condominium units. For example, 101 North Queen St has mixed use, with condominiums. Each condominium in this building has its own unique parcel number. In contrast, a three-family building on West End Ave will have a single parcel number, while still being comprised of three distinct housing units.

The default assumption in this analysis is that each multi-family dwelling has one owner-occupied unit, with the remaining units available in the rental market. This assumption is modified where information exists from the City's rental database.

Multi-family dwellings represent 18% of the City's housing units. Although found throughout the City, they are more intensely present in the Northwest, Northeast and East-West Corridor. In these three sections of the City, they make up anywhere from 23% to 28% of the housing units. In the southern half of the City, multi-family dwellings are less frequently found, making up only 11% to 12% of the housing stock.

Housing units in multi-family dwellings tend to be comparable to apartments, predominantly offering one and two-bedroom units.

## ***Apartments***

Apartments account for just under one-quarter of the City's housing stock. Defined as housing units found on parcels with land uses other than residential, apartments are typically found in buildings with a large number of housing units. This analysis assumes apartments are in the rental market because they are managed in a structure that does not allow home ownership (unlike condominiums and townhouses). The availability of apartment housing varies across the City. This type of housing is most prevalent in the Southeast, representing 31% of its housing units. In the East-West Corridor and Northwest, apartments account for roughly 27% of the available housing. They have the lowest share of housing units in the Southwest and Northeast (16% and 19%, respectively).

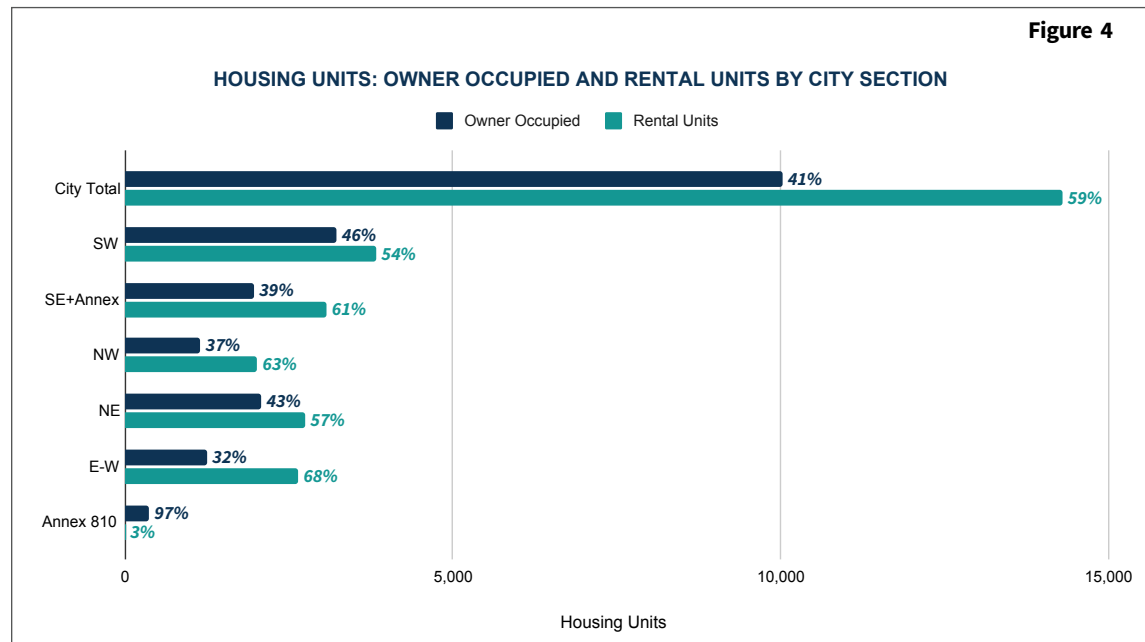
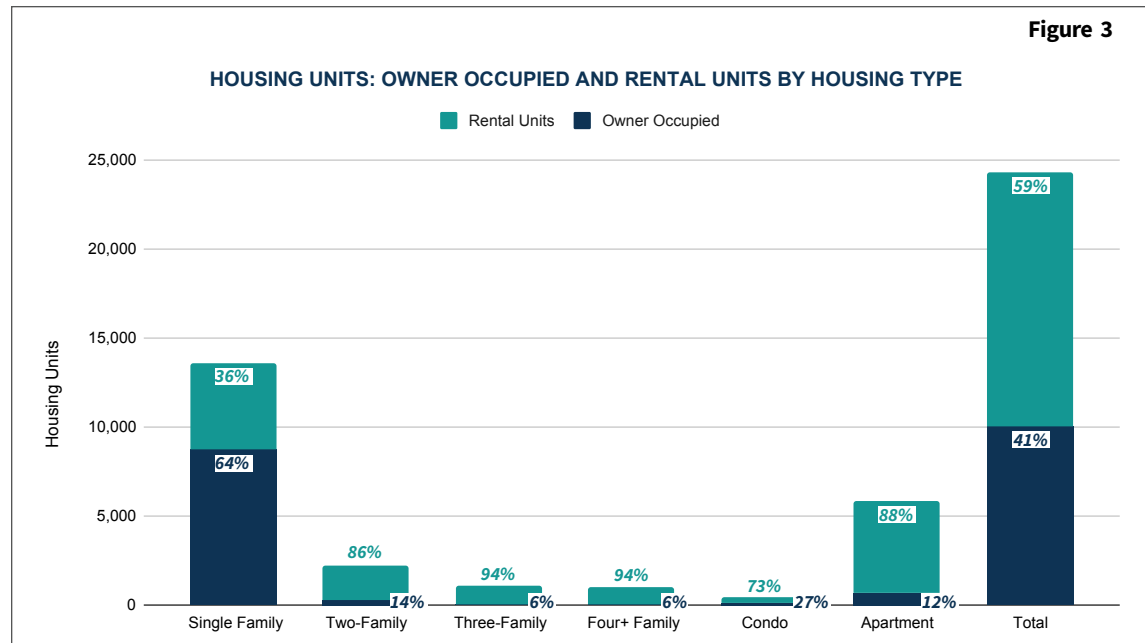
The County's parcel data has limited information on the number of bedrooms in each housing unit. As a result, this analysis draws on the information recorded with each parcel in combination with the information from the US Census Bureau's American Community Survey (ACS). Collectively the two data points suggest just over half of the apartments and multi-family dwellings are two-bedrooms. One-bedroom units make up 36% of apartments and multi-family units, and 9% are efficiencies.

## Rental Market

Nearly 60% of the City's housing stock is estimated to be in the rental market. These charts illustrate how the concentration of rental housing varies by the type of housing and location.

By housing type (**Figure 3**), the rental market is highest in multi-family dwellings and apartments. In contrast, the owner-occupied rate for single family housing is roughly 64% across the City.

By City section (**Figure 4**), the owner-occupied rates of housing ranges from 32% in the East-West Corridor to 46% in the Southwest and 97% in Annex 810. As noted previously, the availability of single family dwellings plays an important factor in the rate of owner-occupied housing units. In the Southwest Quadrant and Annex 810, single family dwellings make up a substantial portion of the housing units. In the East-West Corridor, multi-family buildings and apartments account for the majority of housing units.



IMPLICATIONS  
OF EXISTING  
HOUSING  
STOCK

Healthy housing markets are the result of both supply- and demand-side factors. Supply-side conditions reflect the amount and type of housing units. The demand-side takes into account the needs and resources that City residents have for housing.

In the City of Lancaster, supply-side factors feature prominently in the challenges of affordable housing, but are not the sole contributing factors. The shortage of specific types of housing exacerbates conditions, fueling higher housing costs (in rental and home ownership markets). At the same time, the income profiles of the City’s household population are also at play. They amplify the problem of affordable housing and the widespread prevalence of housing cost burden among City residents. These challenges can be more acute in some parts of the City given the diversity and variation of residents and housing across the City’s section.

Housing Stock by City  
Section

To understand both sides of the housing affordability equation, the analysis draws on two data sets. The County parcel data provides a basis for characterizing the total supply of housing and how it is distributed across the City. The 2019 data from the American Community Survey (ACS) provides the most readily available information on the City’s population, detailing estimates that help characterize household composition and incomes.

The two data sources use different geographic disaggregation of the City. As noted earlier, the County parcel data divides the City into wards and annexes. These areas are loosely block-shaped and follow the City’s municipal boundary. The ACS

HOUSING STOCK BY CITY SECTION						Figure 5
HOUSING TYPE	E-W	NE	NW	SE + ANNEX	SW	CITY
HOUSING UNITS	3,872	4,827	2,783	4,470	7,044	22,996
HOUSEHOLDS	3,468	4,281	2,423	4,184	6,480	20,835
RATIO OF UNITS TO HOUSEHOLDS	1.1	1.1	1.2	1.1	1.1	1.1
NOTE: The housing unit estimates exclude some sections of the City to facilitate alignment with population estimates available at the Census tract level. This approach omits approximately 4-5% of the City’s population and housing units.						



divides the City into Census tracts. The Census tracts meander and do not follow municipal boundaries.

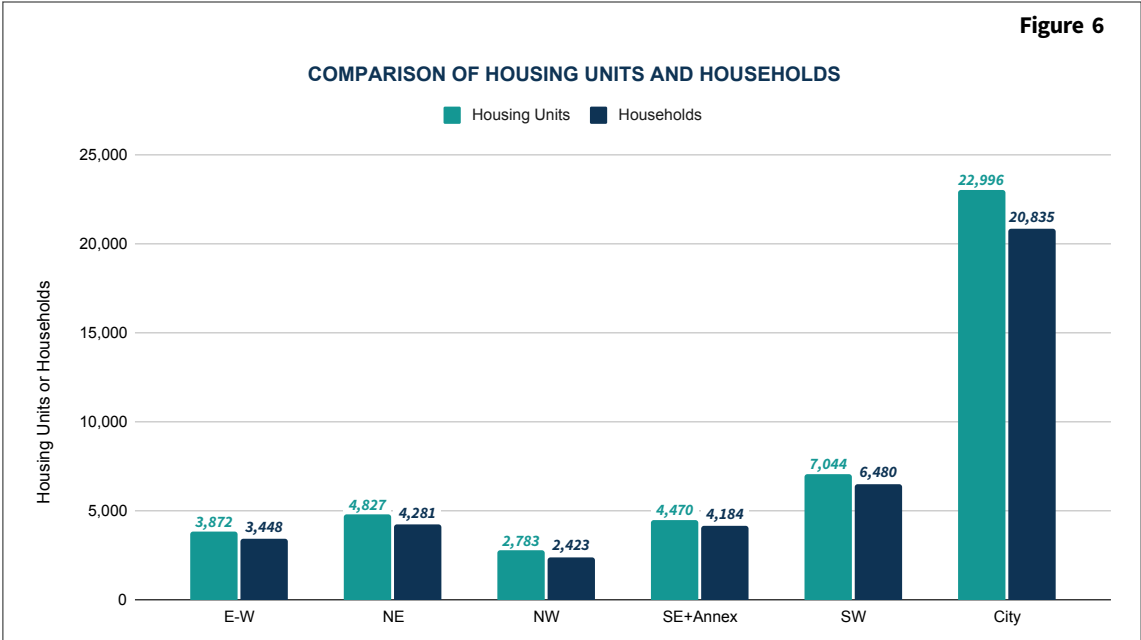
Because of the imperfect alignment between City sections and Census tracts, detailing housing for each City section is based on a sample. The 2019 ACS data estimates that the City's 59,300 residents were comprised of roughly 22,100 households. The parcel-level analysis of housing estimates that the City has around 24,300 housing units. The sample captures around 95% of each, focusing on the central parts of the City and generally excluding some Annex areas.

Based on this sample, the City's vacancy rate is 9%. This rate seems high at an aggregate level, but it translates to 1.1 housing units per household. In other words, for every 10 households, there is one vacant unit. This ratio does not give consideration to the type and size of housing, nor does it account for housing quality. The result is that the vacancy rate likely overstates the excess supply of housing in the City. **Figure 5** and **Figure 6** also highlight that vacancy rates vary across the City.

**Families** are defined as households with two or more individuals that are married or related by birth, marriage or adoption.

**Nonfamily households** consist of one or more persons that are unrelated.

Household composition varies across the City. The following sections detail how the City's housing stock aligns with household characteristics within each of the five analytic sections of the City. To evaluate where housing supply challenges may be most acute, the analysis makes assumptions about the minimum number of bedrooms required for households based on their composition. For example, individuals living alone are assumed to require an efficiency or a one-bedroom housing unit. Couples (married or co-habiting) and without children are assumed to require one or two bedroom units. Families with children under the age of 18 are assumed to need single family dwellings or three-bedroom housing units.



# East-West Corridor

The East-West Corridor has an estimated 3,870 housing units. Given the Main Street composition of this City section, the housing stock is largely comprised of apartments and multi-family dwellings (including condominiums).

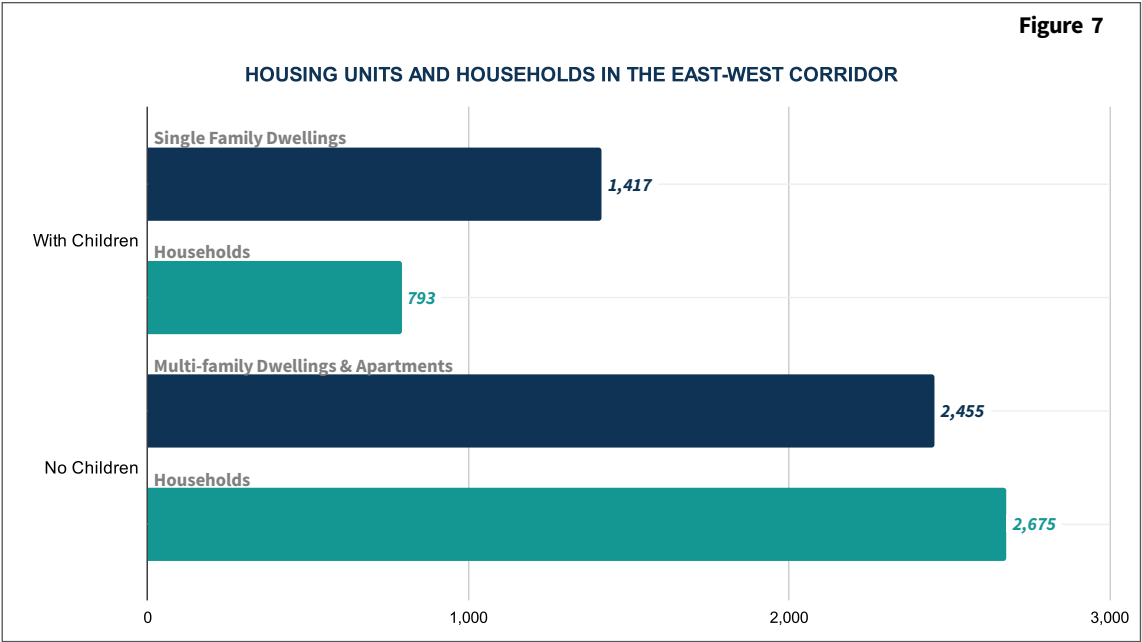
Aligning with this type of housing, the household population in this part of the City is largely made up of people living alone (36% of households) or households without children (40%). Less than one-quarter of the households have children under the age of 18.

The vacancy rate in this section is 10%, with 3,500 of the 3,900 housing units occupied. However, **Figure 7** illustrates that the excess supply is likely confined to single family dwellings, and **Figure 8** details the housing stock.

## Rental Market

Just under 70% of the housing stock in this part of the City is in the rental market. Single family dwellings have the lowest share of units in the rental market (30%). While over 87% of all other housing types are in the rental market.

The ACS estimates 66% of the households rent (2,300 of 3,470 households). Median rent ranges from \$815 to \$845. Nearly 42% of renting households are housing cost burdened (ie, allocating at least 30% of household income to rent), and 29% pay at least \$1,000 per month in rent.



**Figure 8**

**HOUSING STOCK AND VACANCIES IN EAST-WEST CORRIDOR**

	UNITS	HOUSEHOLDS W/ CHILDREN	HOUSEHOLDERS LIVING ALONE	HOUSEHOLDS W/ NO CHILDREN	RATIO HOUSING TO HOUSEHOLDS
SINGLE FAMILY	1,417	793			1.8
TWO-FAMILY	488				
THREE-FAMILY	279				
FOUR-FAMILY	114				
FIVE+ FAMILY	204		1,267	1,408	0.9
CONDO	324				
APT + OTHER 500	1,046				
TOTAL	3,872		3,468		1.1
VACANCY RATE	10%				
VACANT UNITS	404				

# Northeast Quadrant

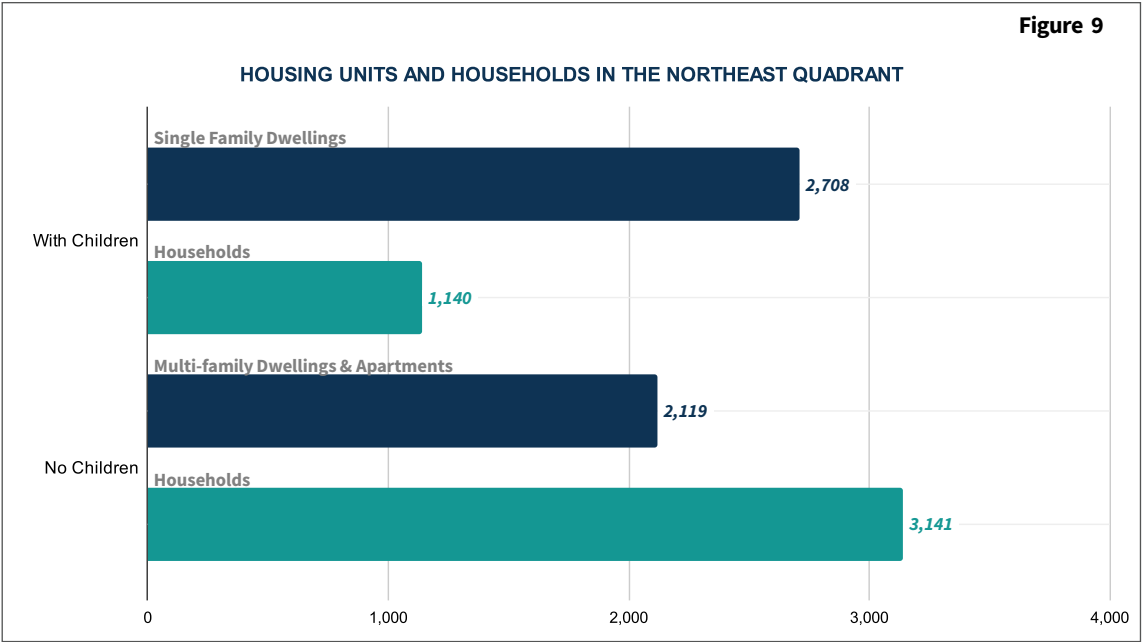
The Northeast Quadrant’s housing stock is not well aligned with its resident population. It has an estimated 4,830 housing units. Over half of the housing units (56%) are single family dwellings, but only 27% of the households have children. Multi-family dwellings and apartments make up 44% of the housing units, while 73% of the households live alone or do not have children. Multi-family dwellings (which account for 24% of the housing stock) are slightly more prominent than apartments.

The vacancy rate in the Northeast Quadrant is 11%, with 550 of the housing units unoccupied. **Figure 9** illustrates that the excess supply is likely confined to single family dwellings, and **Figure 10** provides greater detail.

## Rental Market

The Northeast Quadrant has among the lowest share of housing in the rental market. Just under 60% of the housing stock is in the rental market. Single family dwellings have the lowest share of units in the rental market (32%). Over 90% of all other housing types are in the rental market.

The ACS estimates roughly half of the households rent (2,200 of 4,280 households). This section of the City has the widest range in rent. Median values range from \$790 to \$981. Just over 40% of renting households are housing cost burdened (ie, allocating at least 30% of household income to rent), and one-third pay at least \$1,000 per month in rent.



**Figure 10**

HOUSING STOCK AND VACANCIES IN NORTHEAST QUADRANT

	UNITS	HOUSEHOLDS W/ CHILDREN	HOUSEHOLDERS LIVING ALONE	HOUSEHOLDS W/ NO CHILDREN	RATIO HOUSING TO HOUSEHOLDS
SINGLE FAMILY	2,708	1,140			2.4
TWO-FAMILY	503				
THREE-FAMILY	282				
FOUR-FAMILY	153				
FIVE+ FAMILY	176				
CONDO	63				
APT + OTHER 500	942				
TOTAL	4,827		4,281		1.1
VACANCY RATE	11%				
VACANT UNITS	546				

# Northwest Quadrant

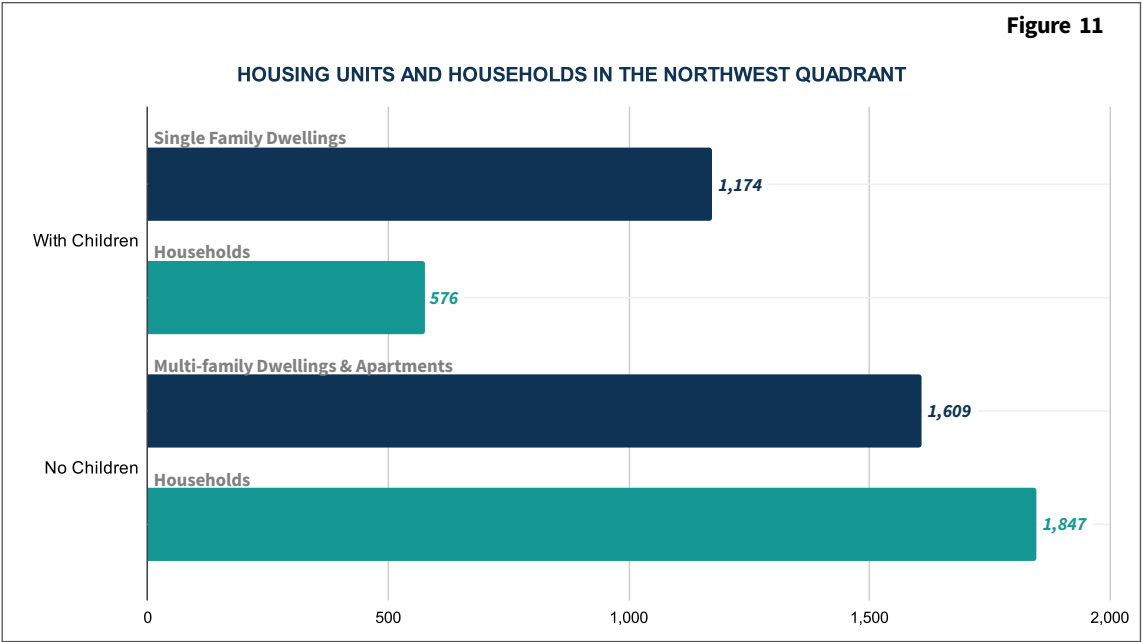
The Northwest Quadrant of the City has an estimated 2,780 housing units. Single family dwellings comprise 42% of the housing stock (1,170). Multi-family dwellings and apartments make up the other 58%. In this area, it is estimated that there are twice the number of single family dwellings than there are households with children under the age of 18. Three-quarters of the households are a person living alone or people living together but without children.

The vacancy rate in the Northwest Quadrant is 13%, with 360 of the housing units unoccupied. **Figure 11** illustrates that the excess supply is likely confined to single family dwellings, and **Figure 12** provides greater detail.

## Rental Market

Two-thirds of the housing stock in the Northwest Quadrant is estimated to be in the rental market. Single family dwellings, like other sections of the City, have higher owner-occupied rates. An estimated 40% of the single family dwellings are in the rental market. Rental rates for all other housing types are generally in excess of 90%.

The ACS estimates 64% of households rent (1,540 of 2,420 households). Median rent in this section of the City has a range similar to the Northeast (\$790 to \$970). Over 40% of renting households are housing cost burdened (ie, allocating at least 30% of household income to rent), and 34% pay at least \$1,000 per month in rent.



**Figure 12**

**HOUSING STOCK AND VACANCIES IN NORTHWEST CORRIDOR**

	UNITS	HOUSEHOLDS W/ CHILDREN	HOUSEHOLDERS LIVING ALONE	HOUSEHOLDS W/ NO CHILDREN	RATIO HOUSING TO HOUSEHOLDS
SINGLE FAMILY	1,174	576			2.0
TWO-FAMILY	354				
THREE-FAMILY	216				
FOUR-FAMILY	120				
FIVE+ FAMILY	63				
CONDO	69				
APT + OTHER 500	787				
TOTAL	2,783		2,423		1.1
VACANCY RATE	13%				
VACANT UNITS	360				

# Southeast Quadrant and Selected Annexes

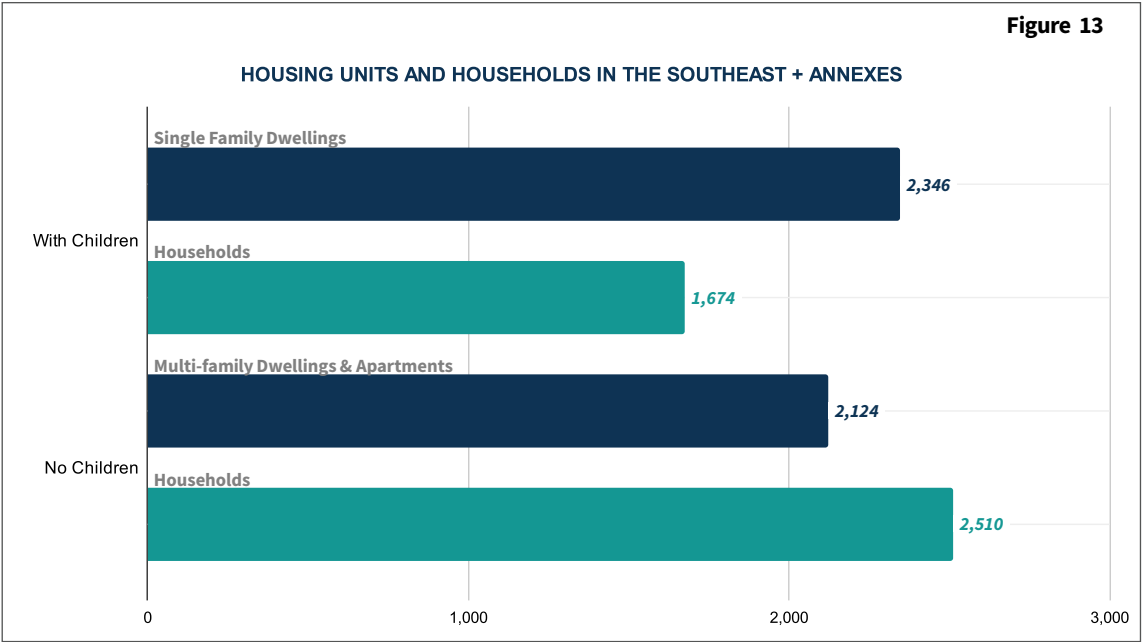
The Southeast Quadrant (combined with selected annexes) has an estimated 4,470 housing units. Single family dwellings comprise 52% of the housing stock (2,350). Multi-family dwellings and apartments make up the other portion. In this area, 40% of the households have children, with the other 60% comprised of persons living alone or without children under the age of 18.

The vacancy rate in the Southeast Quadrant, 6%, is the lowest across the City sections. This equates to an estimated 290 vacant housing units. **Figure 13** illustrates that the excess supply is likely confined to single family dwellings, and **Figure 14** provides greater detail.

## Rental Market

The rental market is most significant in this section of the City. Just over two-thirds of the housing stock is estimated to be in the rental market, and 67% of the households rent (2,820 of 4,180 households).

In this section of the City, median rent ranges from \$715 to \$880. This range is lower than the other parts of the City. Reflecting the lower range of rent, only 21% of renting households pay more than \$1,000 per month. Despite lower rent, this part of the City has the highest share of households that are housing cost burdened. 56% of renting households allocate at least 30% of their income to housing.



**Figure 14**

HOUSING STOCK AND VACANCIES IN SOUTHEAST + ANNEXES

	UNITS	HOUSEHOLDS W/ CHILDREN	HOUSEHOLDERS LIVING ALONE	HOUSEHOLDS W/ NO CHILDREN	RATIO HOUSING TO HOUSEHOLDS
SINGLE FAMILY	2,346	1,674			1.4
TWO-FAMILY	325				
THREE-FAMILY	131				
FOUR-FAMILY	53				
FIVE+ FAMILY	33		1,169	1,340	0.6
CONDO	4				
APT + OTHER 500	1,578				
TOTAL	4,470		4,184		1.1
VACANCY RATE	6%				
VACANT UNITS	286				

# Southwest Quadrant

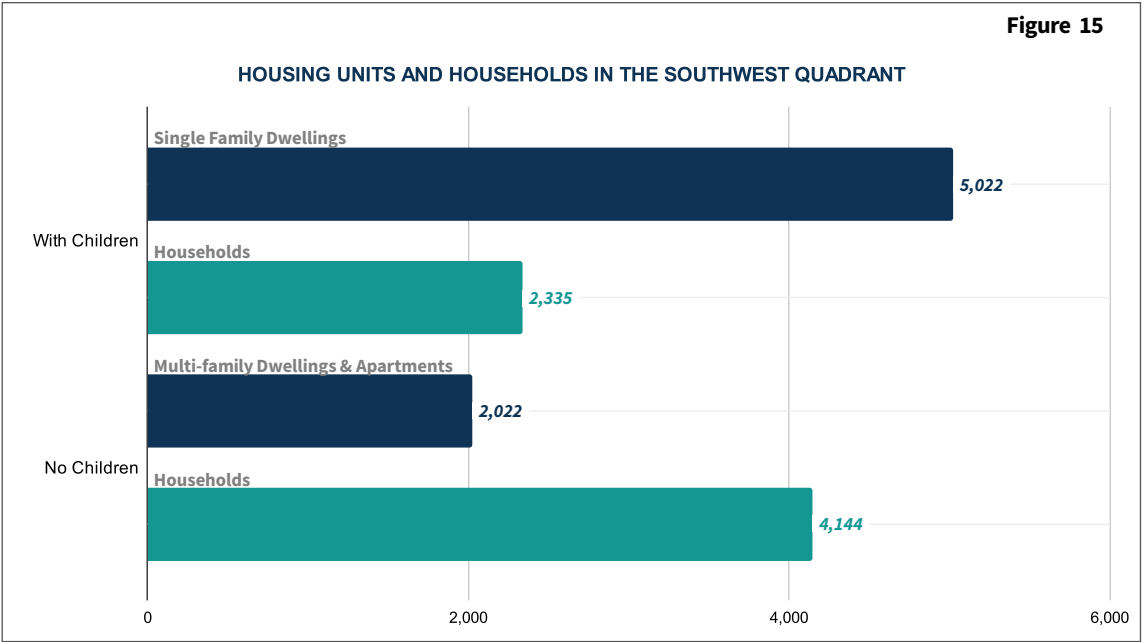
The Southwest Quadrant of the City has an estimated 7,040 housing units. Across the City sections, the Southwest has the largest share of single family dwellings. They comprise 71% of the section’s housing stock (5,020). Multi-family dwellings and apartments make up less than 30% of the housing units. Despite the significant availability of single family dwellings, households without children or individuals living alone are the majority. 37% of households have no children. Another 27% of households have someone living alone. Only 36% of the households in the Southwest Quadrant have children.

Despite the differences in composition between the types of available housing and household composition, this part of the City has a relatively low vacancy rate (8%). Approximately 560 housing units are vacant. **Figure 15** illustrates the differences in housing stock and household composition, and **Figure 16** provides greater detail.

## Rental Market

Across the City sections, the Southwest Quadrant has the lowest portion of housing in the rental market. Approximately 3,840 of the 7,040 housing units (54%) are in the rental market. At the same time, it has a larger share of single-family dwellings in the rental market (40%).

The ACS estimates almost half of the households rent (3,220 of 6,480 households) in the Southwest Quadrant. Median rent in this section of the City ranges from \$735 to \$955, which is slightly higher than the Southeast Quadrant. Just under 50% of renting households are housing cost burdened (ie, allocating at least 30% of household income to rent), and 34% pay at least \$1000 per month in rent.



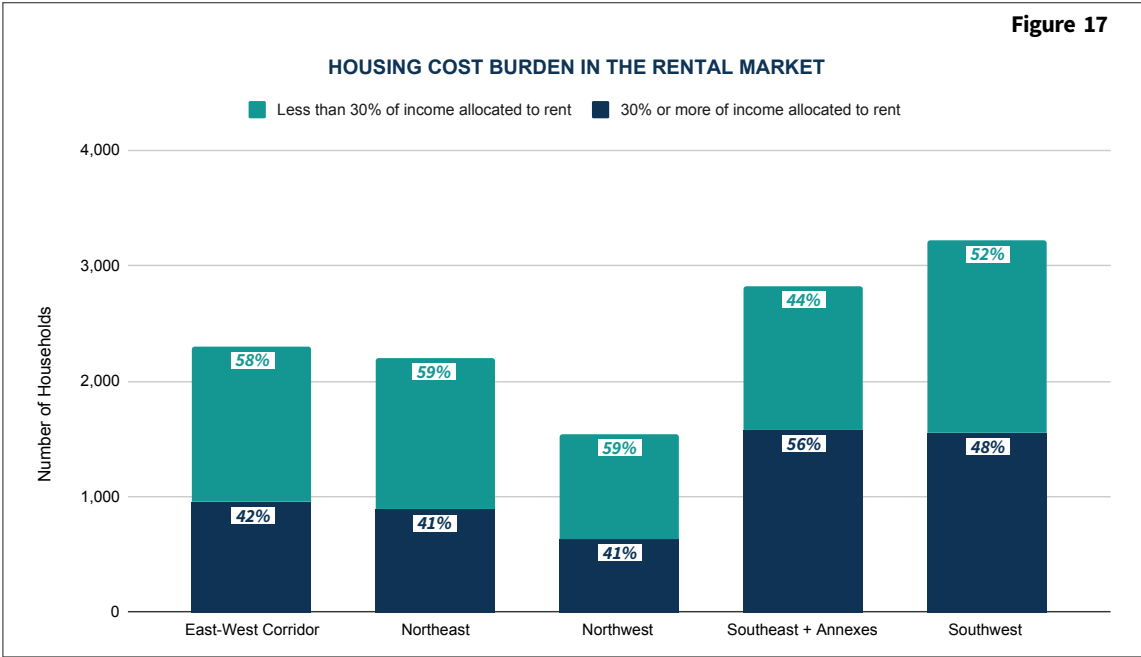
**Figure 16**

HOUSING STOCK AND VACANCIES IN SOUTHWEST QUADRANT

	UNITS	HOUSEHOLDS W/ CHILDREN	HOUSEHOLDERS LIVING ALONE	HOUSEHOLDS W/ NO CHILDREN	RATIO HOUSING TO HOUSEHOLDS
SINGLE FAMILY	5,022	2,335			2.2
TWO-FAMILY	558				
THREE-FAMILY	194				
FOUR-FAMILY	45				
FIVE+ FAMILY	52		1,733	2,412	0.3
CONDO	0				
APT + OTHER 500	1,173				
TOTAL	7,044		6,480		1.1
VACANCY RATE	8%				
VACANT UNITS	564				

Summary

The table summarizes key data points about housing cost burden across the City.



**Figure 18**

**HOUSING COST BURDEN IN THE RENTAL MARKET (VALUES)**

		EAST-WEST CORRIDOR	NORTHEAST	NORTHWEST	SOUTHEAST + ANNEXES	SOUTHWEST
RENTING HOUSEHOLDS	Number of Households	2,302	2,204	1,540	2,822	3,219
	Share of Total Households	66%	51%	64%	67%	50%
HOUSING COST BURDENED	Number of Households	956	900	633	1,576	1,552
	Share of Renting Households	42%	41%	41%	56%	48%
PAYING \$1,000+ IN RENT	Number of Households	669	719	520	607	1100
MEDIAN RENT	Rent Per Month	\$816 - \$845	\$790 - \$981	\$790 - \$973	\$715 - \$880	\$735 - \$954
MEDIAN HOUSEHOLD INCOME	Annual Income	\$28,300 - \$48,800	\$28,300 - \$61,600	\$39,300 - \$54,800	\$28,300 - \$45,800	\$28,300 - \$55,400
TOTAL HOUSEHOLDS		3,468	4,281	2,423	4,184	6,480

## DATA & KEY ASSUMPTIONS

### Data Sources

#### **Lancaster County Parcel database (2019)**

- *Property - Identify all parcels in the City & Annex (by Ward)*
  - *Land use code*
  - *Parcel address*
  - *Property class code*
- *Attribute*
  - *Attribute description (accommodation, apartment/units)*
  - *Number of families, bedrooms and/or units*
- *Occupancies*
  - *Occupancy description (multiple residential, apartment, dormitory, fraternity)*
  - *Number of units*

#### **Lancaster City Rental License database (January 2021)**

- *Parcels licensed for rent and number of units*

#### **US Census Bureau (2019)**

- *Household composition and location (by Census Tract)*
- *Number of housing units – rented v. own*
- \* *Housing units are defined as parcels with residential occupancy on any land use category, such as single or multi-family dwellings, condos, apartments, multi-family residential, dormitory.*

### Rental Housing Units

- *Identify based on rental license database*
- *Assume all apartments & units in multi-use property (not condo) are rental.*
- *All multi-family dwellings at least one unit assumed owner-occupied and all others are rental.*

### Detailing City's Population

#### **US Census Bureau (2019) - Selected tables from the American Community Survey (2019)**

- *Median income in the past 12 months*
- *Selected social characteristics of households and families*
- *Selected housing characteristics, homeownership rate*
- *Households and families*

\* *Data is accessed at Census Tract and aggregated to construct "City Sections".*



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**ECONOMIC DEVELOPMENT COMPANY  
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# INTERIM HOUSING STRATEGY

OCTOBER 2021

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## GUIDING FRAMEWORK

### I. Strategy Purpose

This housing strategy contains overarching quantitative policy targets, broad strategic goals, and key program tools for implementation of those goals over the next five (5) years. It is called an interim or working strategy because we view this effort as a foundation, which we will build upon and refine, especially during the Comprehensive Plan process, over the next one to two years. The strategy is not intended to be exhaustive, but rather shine a light on where we can and should focus our limited time, energy, and funds.

It is the intention of the City to increase the supply and diversity of housing in the city, with an emphasis on achieving

affordable homes for both rent and purchase. "Achieving" affordable homes can take the form of producing affordable housing units in new buildings or finding ways to protect or redevelop affordable housing units that are in structures that already exist.

Housing development, as a practice, takes a great deal of time, painstaking effort, and financial capital, as well as effective coordination and collaboration with a variety of stakeholders. Therefore, we must plan and align our resources for maximum impact.

### II. Market Context

Based on several indicators such as vacancy rates, housing price increases, and citizen input, we know the city needs more housing, serving a range of household types, income levels, and occupancy styles.

Preliminary analysis shows that housing cost burden is widespread across the income profile of residents (note: housing cost burden is defined as spending more than 30 percent of a household's gross income on housing). This situation of housing cost burden is being driven by a shortage in housing supply and generally low incomes in the City of Lancaster. Further, we have learned that the City's housing

stock does not align with the current household composition of the city, meaning that most homes are single-family, multi-bedroom dwellings, while the majority of households are composed of one or two people.

Effective housing development also relies upon strong neighborhood design, including access to transportation, goods and services, employment, recreational amenities, and attractive public spaces. Mixed-income and mixed-use development have been identified as international best practice in promoting equitable and cohesive growth.

### III. Equity Lens

We believe in affirmatively furthering fair housing and acknowledging the history of structural racism that has impacted where people live and what resources they have. This means, in part, addressing housing quality and choice throughout all areas of the city – with an emphasis on creating more housing options for disenfranchised populations, which disproportionately make up our low- and moderate-income households.

It means creating more pathways to homeownership in the southern quadrants of the city for existing residents and subsidizing additional affordable rental units (at different

price points) in the northern quadrants of the city. It means striving for consistency in housing condition and quality across all quadrants.

Finally, it means an amplified focus on increasing household incomes. While that is not an explicit component of *this* housing strategy, it does factor in new, specific ways in the City's Strategic Plan for 2022–2025.

There is no silver bullet for solving housing challenges here in Lancaster, as we face what is a national crisis at the local level. As such, we need an integrated and iterative approach.

## Guiding Framework (Continued)

### IV. Evidence-Based Decision Making

Housing is a serious public policy topic, which brings forth a range of ideas, opinions, and emotions. The City is dedicated to better understanding the existing conditions and trends through research and analysis and making decisions based on that data.

The City has commissioned an initial study of affordable housing through the Center for Regional Analysis and will be conducting additional analyses through the Comprehensive Plan and beyond, initiating a cycle of more

informed policies in the future. Periodic resources such as the American Community Survey and American Housing Survey will also be used to help provide a clearer, sustained picture of the housing situation in the City over time.

Further, the City will track metrics every year to evaluate how much progress is being made against our housing targets and what program tools are working well and which are not.

### V. Partnerships

The City cannot tackle housing challenges alone. We work with a network of organizations and agencies to implement projects and programs. Our partners include governmental agencies and authorities, community and nonprofit housing development organizations, housing assistance and counseling organizations, neighborhood leaders and associations, private developers and property owners, and others.

We believe in building off a strong track record of communication and collaboration with and between these partners, in an effort to further coordinate impact, reduce competition for resources, and expand our community's capacity. Ultimately, it is our partners that actually build

and renovate housing – so the City must ensure assets and funding are going to those partners with clear direction and parameters for development.

It is important to note in closing that attaining successful housing solutions for persons experiencing homelessness is an especially complex part of this puzzle and deserves its own dedicated strategy. Coordination of homeless service provision occurs primarily through the LancCo MyHome Coalition and County government. The City encourages a cohesive analysis and plan and wishes to be part of the team to determine and implement appropriate actions.

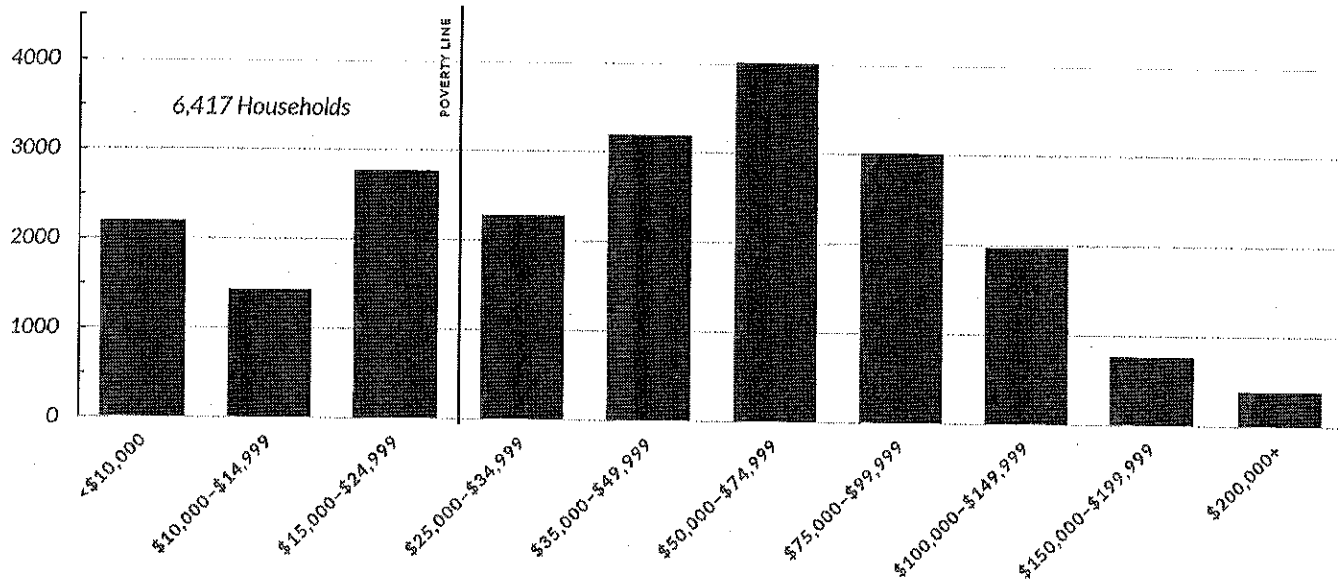
## QUANTITATIVE POLICY TARGETS

As determined in *Housing Availability in the City of Lancaster and Implications for Housing Affordability* by the Center for Regional Analysis, we know the City of Lancaster has a housing shortage estimated between 1,165–2,455 units across rental and homeownership markets. Based on this finding, and on known market conditions, the city will aim to meet the following, overarching targets by 2026:

1. The City will facilitate the creation of 2,000 new housing units, with the goal of at least 15 percent affordable.
2. The City will protect and improve 1,000 existing low- to moderate-income homes.
3. The City will evaluate and address every rental housing unit in the City, with the goal that at least 85 percent are rated fair or good condition.

\*Affordable housing units are defined as below 80 percent of the Area Median Income (AMI), according to U.S. Department of Housing and Urban Development calculations for the Metropolitan Statistical Area, which comprises the County as a whole. As a rule of thumb, City AMI is a little more than 60 percent of the County AMI.

## Distribution of Household Income in Lancaster City (2019)



## STRATEGIC GOALS & PROGRAM TOOLS FOR IMPLEMENTATION

- Goal 1 **PRODUCE** approximately 2000 new units, 300 of which are affordable
- Goal 2 **PROTECT** approximately 14,000 existing units, and improve 1,000+ units
- Goal 3 **ACQUIRE** approximately 200 units for affordability-focused redevelopment
- Goal 4 **INNOVATE** to create approximately 100 new units
- Goal 5 **SUSTAIN** existing affordability and neighborhood vitality

### GOAL 1 **PRODUCE** [~2000 total units / 300 affordable]

Produce housing units in new construction to meet demand and expand the number of available homes, both affordable and market-rate.

- A. Comprehensive Plan / Land Development / Zoning: Create land use rules that promote housing supply while balancing good design. Put more units in the right places, create more of the right-sized units, and focus on livability and walkability. Because land development opportunities are limited, increasing housing supply depends upon repurposing and rehabilitating buildings, building up in height, and boosting density.
- B. Investment Capital: Create an urban environment that establishes a place where people want to live, work, and play and attracts investment capital to develop housing and mixed-use projects. Leverage financial tools like Local Economic Revitalization Tax Assistance (LERTA) and the City Revitalization and Improvement Zone (CRIZ) to help activate land development.
- C. Subsidy for Affordable Units: Realizing 15 percent of new units as affordable will require significant grant subsidy and/or low-cost financing. Use a combination of public and private funding sources to make affordable units within new land development economically feasible. Sources may include federal and state monies such as HOME, CDBG, NAP, PHARE, and ARPA monies, plus philanthropic or civic-oriented contributions.

## Strategic Goals & Program Tools for Implementation (Continued)

### GOAL 2 PROTECT [*~14,000 units evaluated / 1,000+ improved*]

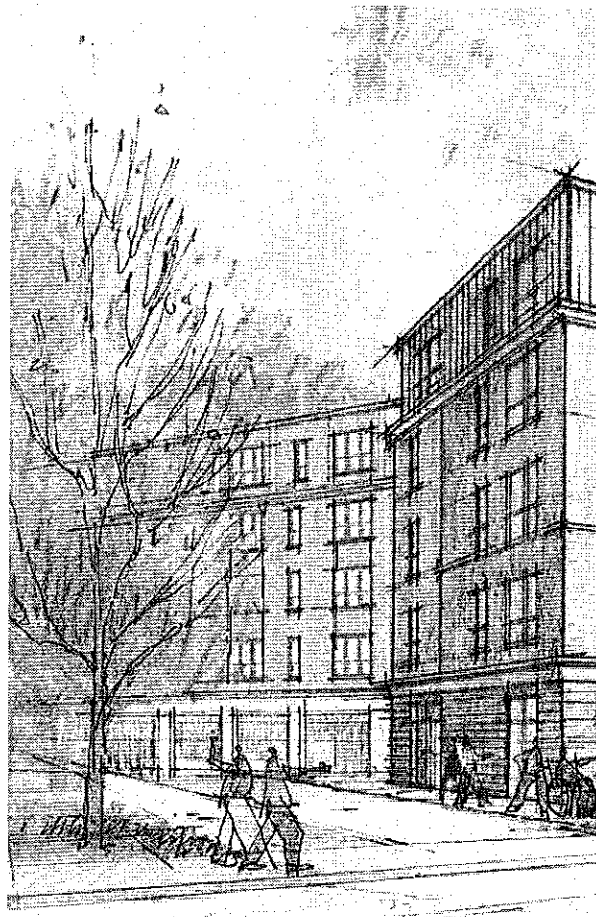
Protect, maintain, and improve the quality of existing housing to help keep households safe and affordable.

- A. Housing Inspections and Maintenance: Proactively protect properties and structures through systematic and complaint-based inspections and property maintenance actions. Hold all landlords accountable for providing safe and good-quality housing to their tenants. Update the City's Rental Property and Lead ordinances to focus resources and increase the number of inspections and incentivize rental housing upgrades where they are needed most. Boost landlord education efforts to foster a culture of commitment and compliance with City standards.
- B. Lead Remediation & Healthy Home Grants: Utilize the City and LGH lead programs to make as many homes lead safe as possible throughout the City, with a focus on the most under-served and vulnerable neighborhoods. Focus U.S. Department of Housing and Urban Development (HUD) funds on targeted Census tracts and LGH funds on other locations such as daycare facilities, Lancaster City Housing Authority properties, and low- to moderate income households in other tracts / quadrants.
- C. Critical Repair Grants and Loans: Provide financial support to low- and moderate- income homeowners to address costly repairs that can put families in jeopardy of harm or financial hardship when they face necessary fixes such as roofs, furnaces, utility lines, and home accessibility. Adapt the program to offer grants to households (versus loans) at or below 50 percent AMI.

### GOAL 3 ACQUIRE [*~200 units*]

Acquire properties and redevelop for the express purpose of neighborhood revitalization and affordability.

- A. Redevelopment Authority of the City of Lancaster (RACL): Partner with RACL to acquire blighted properties through the Property Reinvestment process. Move those properties into the hands of new owners who will redevelop for housing purposes. Rehabilitated RACL properties must be sold to families under 80% AMI who will occupy the home or rented to households below 60% AMI.
- B. Land Bank: Partner with the City's Land Bank to strategically purchase properties that can satisfy housing needs in the City. Offer those properties for sale first to Community Housing Development Organizations (CHDO), per established agreement. Coordinate a shared approach with the CHDOs to acquire for redevelopment.
- C. City-Led Conversion: The City will identify and oversee the purchase of select properties for affordable housing development and move those properties to housing developers, with deed restrictions or covenants that designate those properties for affordable or mixed-income redevelopment.
- D. Transitional Facility: In concert with the County and LancCo MyHome, identify and develop a permanent facility or facilities to provide transitional living housing and wrap-around services to meet the needs of those individuals moving from homelessness to a stable living situation, including an additional 40 units in the City.





## Strategic Goals & Program Tools for Implementation (Continued)

### GOAL 4 INNOVATE [~100 units]

Innovate by exploring emerging housing design types, which may facilitate lower-cost housing units.

Possibilities may include:

- A. Home Sharing and Community Living Models: Evaluate and where appropriate enable more flexible shared living arrangements, which may lend themselves, especially, to younger or older households who tend to have lower or fixed incomes.
- B. Accessory Dwelling Units: Ensure zoning and building codes encourage accessory dwelling units where feasible. Explore opportunities for community housing development organizations to build out ADUs and create wealth for low- to moderate- income households.
- C. Tiny Homes: Analyze square footage requirements and other rules to determine where smaller units may provide more options and meet specific demand in the market. Revise ordinances as needed.
- D. Reduced Parking Requirements: Implement reduced parking minimums in targeted areas, such as Downtown, on commercial corridors with bus transit service, and around the train station.

*Below: Planned new construction affordable housing at 213 College Avenue made possible by a combination of grant subsidy and low-cost financing.*



### GOAL 5 SUSTAIN [# of households/persons served; \$ dispersed]

Sustain and foster housing stability and neighborhood vitality.

- A. Safety Nets: Provide financial supports to prevent housing loss through programs such as Emergency Rental Assistance and Utility Assistance. Cover gap expenses for missed rent or utility payments to prevent residents from being evicted; couple with related capacity supports, such as case management, financial counseling, and/or job navigation as possible. Maintain the financial health of landlords to avoid hardship and property deterioration through the Emergency Assistance programming.
- B. Home Ownership Protections: Expand and explore programs to help low-income homeowners stay in their homes as they age and build equity, such as Low-Interest Home Loans and Façade Improvement Grants.
- C. Pathways to Home Ownership: Expand and explore pathways to help low-income residents purchase a home and build wealth, such as Down Payment Assistance, Live Near Your Work Grants and the Tenants Opportunity to Purchase Act (TOPA).
- D. Homeless Shelter: Contribute resources and support to help establish appropriate planning, funding levels, and program management with the County and LancCo MyHome to ensure at least 100 quality, emergency shelter beds in the City, including 20-30 new shelter beds.



GOAL	PROGRAM TOOL	IMPLEMENTERS	METRIC	TARGET
PRODUCE	Comp Plan/Land Development	City of Lancaster LCA Land/Housing Developers Anchor Institutions	# of Housing Units % Affordable	2,000 15%
	Investment Capital	Land/Housing Developers Property Owners Banks/CDFIs/LCA	Private \$ Invested	\$1B
	Subsidy for Affordable Units	City of Lancaster Land/Housing Developers Foundations/CDFIs	# of Affordable Units	300
PROTECT	Housing Inspections and Maintenance	Property Owners City of Lancaster	# of Units Evaluated # of Units Improved Condition (Fair/Good)	14,000 1,000 (85%)
	Lead Remediation and Healthy Homes	City of Lancaster Penn Medicine Lanc. General Health	# of Units	700 460
	Critical Repair	City of Lancaster NSPs	# of Units	200
ACQUIRE	Redevelopment Authority of City of Lancaster (RACL)	Redevelopers Rehab Agents	# of Units	40
	Land Bank	CHDOs	# of Units	30
	City-Led Conversion	Land/Housing Developers City of Lancaster	# of Units	90
	Transitional Facility	LCMH NSPs City of Lancaster	# of Units / Beds	40
INNOVATE	Shared Living Models	Land/Housing Developers City of Lancaster	# of Units	60
	Accessory Dwelling Units	Property Owners CHDOs Foundations/Philanthropists	# of Units	20
	Tiny Homes	Land/Housing Developers City of Lancaster	# of Units	20
	Reduced Parking Requirements	City of Lancaster	Parking Ratios	N/A
SUSTAIN	Safety Net Assistance	Lancaster County NSPs/LEAs	# of Households Served \$ Dispersed	TBD
	Homeowner Protections	NSPs/LEAs/LCA City of Lancaster	# of Households Served \$ Dispersed	250 TBD
	Pathways to Homeownership	NSPs/LEAs City of Lancaster	# of Households Served \$ Dispersed	200 TBD
	Homeless Shelter	LCMH/NSPs City of Lancaster	Total Beds New Beds	100 30

#### ACRONYMS

CDFIs Community Development Financial Institutions  
CHDOs Community Housing Development Organizations  
LCA Lancaster City Alliance

LEAs Lancaster Equity Agencies  
LCMH Lanc Co MyHome  
NSPs Nonprofit Service Partners

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## AFFORDABLE HOUSING IN THE CITY OF LANCASTER

The City of Lancaster is committed to using all of the tools we have to create as many affordable housing units as possible. The availability of affordable housing is a key issue for our city residents and neighbors in Lancaster County. The City is making budgetary and programmatic commitments to increase affordable housing units within the City. While the City has made this commitment, the City's tools alone cannot solve this issue. Local governments like Lancaster City are funded through taxes, so the City depends on County, State and Federal funds to support this effort to avoid placing additional tax burden on City residents.

The Sorace Administration continues to advocate for increased federal and state funds toward creating affordable housing units in Lancaster City and County. Join us in this advocacy at [cityoflanasterpa.com/take-action](http://cityoflanasterpa.com/take-action).

## LEARN MORE ABOUT AFFORDABLE HOUSING IN THE CITY OF LANCASTER

[CityOfLancasterPA.com/affordable-housing](http://CityOfLancasterPA.com/affordable-housing)

DEPARTMENT OF COMMUNITY PLANING &  
ECONOMIC DEVELOPMENT  
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CITY OF  
LANCASTER

## **Lancaster City Limited English Proficiency Analysis and Language Access Plan**

### **Introduction**

Under Title VI of the Civil Rights Act of 1964, Limited English Proficiency (LEP) persons are entitled to language assistance with respect to services/benefits from or interactions with recipients of federal financial assistance. Per HUD guidance, agencies should provide reasonable accommodations for languages that consist of more than 5% of the population.

The purpose of this Language Assistance Plan (LAP) is to document the City of Lancaster's dedication to (1) provide LEP persons with a reasonable set of tools to access programs and services offered by Lancaster City and (2) prevent discrimination based on a persons' national origin. The LAP also serves as a resource for Lancaster City staff, clearly explaining procedures for sufficient assistance for LEP persons.

LEP refers to a person's limited ability to read, write, speak, or understand English. Individuals who are LEP are not a protected class under the Fair Housing Act (the Act). However, the Act prohibits providers from using LEP selectively as a pretext for discrimination against a protected class or in a way that causes an unjustified discriminatory effect.

To provide access for LEP persons to programs and activities, federal recipients are advised to:

1. Conduct the Four-Factor Analysis (see *Appendix B: Four Factor Analysis*);
2. Develop a Language Access Plan (LAP); and
3. Implement the Language Access Plan to provide appropriate language assistance.

As set forth in Exhibit "B", the City has completed step 1 and the promulgation and implementation of this Plan is meant to accomplish steps 2 and 3 above.

### **Language Access Coordinator**

The Mayor of Lancaster City shall appoint a Language Access Coordinator responsible for ensuring equitable language access to participants in Federally funded programs administered by the City for languages that meet the threshold (see *Appendix B: Four Factor Analysis* for more information).

The Language Access Coordinator may delegate duties but retains responsible for oversight, performance, and implementation of the LAP.

Lancaster City's Language Access Coordinator will be responsible for:

- Consulting with local service providers that work closely with Lancaster City's LEP population. These providers are selected at the discretion of the Language Access Coordinator.
- Consulting with Lancaster City Department representatives involved with and/or knowledgeable about Federally funded Lancaster City services.
- Providing an annual update to the Four Factor analysis (see *Appendix B: Four Factor Analysis*).
- Determining whether Lancaster City is making a good faith effort to
  - provide LEP persons with a reasonable set of tools to access programs and services offered by Lancaster City;

- Informing Lancaster City staff of the procedures for sufficient assistance for LEP persons.
- Informing the Lancaster City Mayor on the state of access of Lancaster City services to its LEP populations
- Recommending changes and shifts in services provision standards and processes.
- Maintaining proper signage.

Please see *Appendix D: Further Language Access Strategies* for supplemental information on how the above may be accomplished by the Language Access Coordinator.

### **Public Announcement and Signage**

A sign will be visibly posted in the front lobby at City Hall and the Language Access Coordinator's office informing persons of their right to an interpreter.

The City will include a statement in any public announcements pertaining to any federally funded program that the City will make a good faith effort to provide interpretative services to any LEP person that falls within a language category that meets the Federally set threshold upon request. Currently, Spanish is the only language that meets the Federally designated threshold of 5% (please see Appendix B: Four Factor Analysis).

### **Oral Interpretation**

Lancaster City will make a good faith effort to provide the following interpretation services for Spanish clients who have identified themselves as LEP and request services.

- The City employs bilingual, Spanish speaking staff in several key positions to aid in the provision of oral interpretation (including the Language Access Coordinator position). If a bilingual, Spanish speaking staff member is available to translate, they can provide oral interpretation to an LEP individual.
- Local volunteers have been identified to provide oral translation upon request at public meetings and during conversations with LEP residents. These services may extend to LEP individuals who speak a language other than Spanish.
- If after a client self-identifies as LEP and chooses not to use interpretation services offered to them, they will be asked to fill out and sign the Interpretation Declination Form (Appendix C).

Please see *Appendix D: Further Language Access Strategies* for supplemental information on how the above may be accomplished by the Language Access Coordinator.

### **Written Translation**

Currently, internet sites can be used to translate some written materials. Many of the common forms used in the implementation of the HUD funded programs are available in multiple languages on the HUD websites. Lancaster City's website also includes an automatic translation into Spanish. Any documents or communications that are received by staff for LEP persons that are not in English shall be forwarded to the Language Access Coordinator for translation and then back to the appropriate staff person for processing.

Please see *Appendix D: Further Language Access Strategies* for supplemental information on how the above may be accomplished by the Language Access Coordinator.

## APPENDIX A – Definitions

**HUD Guidance** is specifically Federal Register Vol. 72, No. 13, January 22, 2007

**Interactive Voice Response (IVR)** is an automated system that enabled callers to obtain and provide information over the telephone in English and other languages.

**Interpretation** is assisting with oral or spoken communication between speakers of two different languages.

**Language Access Plan** is the guiding document that ensures access to programs is provided to individuals that may have limited English proficiency and that the resources to do so are available.

**Limited English Proficient (LEP) persons** are defined as persons who do not speak English as their primary language and who have limited ability to read, write, speak or understand English. Lancaster City will not identify anyone as LEP; the beneficiaries of the services and activities must identify themselves as LEP (Federal Register Vol. 72, No. 13, January 22, 2007).

**Major LEP Language Groups** are the populations of persons with LEP in Lancaster County that represent at least 5% or 1,000 individuals in the area, whoever is less.

**Qualified Interpreters** have demonstrated proficiency in English and the second language; demonstrated knowledge in both languages of relevant specialized terms or concepts; have documentation of completion of training on the skills and ethics of interpretation and have awareness of relevant cultural issues.

**Safe Harbor** is the threshold that permits programs to decide when a written translation is required to comply with Title VI of the Civil Rights Act of 1964. The following are the thresholds:

- Written translations of Agency vital documents will be provided for each eligible language group that constitutes at least 5% or 1,000 individuals, whoever is less, of the population of persons eligible to be served or encountered by programs in the service area.
- If there are fewer than 50 persons in a language group, the recipient does not translate vital written materials, but provides written notice in the primary language of the LEP group of their right to oral interpretation for those written materials, free of cost.

**Title VI of the Civil Rights Act of 1964 and its implementing regulations at 45 CFR Part 80** is the law that protects individuals from discrimination based on their race, color, or national origin under any program or activity that receives Federal financial assistance.

**Translation** is taking documents written in one language and writing or reading them in another language.

**Vital documents** are documents, papers or electronics, that contain information that is critical for accessing the City's services and/or benefits; letters or notice that require a response from the customer; and documents that inform customers of free language assistance.

## APPENDIX B: FOUR FACTOR ANALYSIS

- (1) The number and proportion of LEP persons served or encountered in the eligible service area population?

For Lancaster City, 12.3% (+/- 1.3%) of Lancaster City's population (i.e. 6,800 individuals) speak Spanish at home and speak English less than "very well" (2013 – 2017 American Community Survey 5-Year Estimate). This exceeds the United States average of 5% (or 16,357,882) of LEP individuals who speak Spanish (2013 – 2017 American community Survey 5-Year Estimate).

This is the only LEP population that extends over the threshold of 5%. However, the City recognizes other LEP populations (due in part to high rates of refugee and immigrant resettlement to Lancaster from around the world), and will work to reasonably extend the services of this access plan to other languages as needed.

LANGUAGE SPOKEN AT HOME IN LANCASTER CITY, PENNSYLVANIA 2012 - 2016				
Category	Population Estimate	Margin of Error	Percent of Population (X)	Margin of Error (X)
Population 5 years and over	54,990	+/-419		
English only	35,060	+/-988	63.8%	+/-1.8
Language other than English	19,930	+/-982	36.2%	+/-1.8
Speak English less than "very well"	8,507	+/-816	15.5%	+/-1.5
<b>Spanish</b>	16,457	+/-993	29.9%	+/-1.8
<b>Speak English less than "very well"</b>	<b>6,571</b>	+/-756	<b>11.9%</b>	+/-1.4
Other Indo-European languages	1,585	+/-502	2.9%	+/-0.9
Speak English less than "very well"	731	+/-342	1.3%	+/-0.6
Asian and Pacific Islander languages	1,316	+/-374	2.4%	+/-0.7
Speak English less than "very well"	794	+/-231	1.4%	+/-0.4
Other languages	572	+/-230	1.0%	+/-0.4
Speak English less than "very well"	411	+/-176	0.7%	+/-0.3

Source: U.S. Census Bureau, 2012 – 2016 American Community Survey 5-Year Estimate

LANGUAGE SPOKEN AT HOME IN LANCASTER CITY, PENNSYLVANIA 2013 - 2017				
Category	Population Estimate	Margin of Error	Percent of Population (X)	Margin of Error (X)
Population 5 years and over	55,316	+/-392		
English only	34,840	+/-1,129	63.0%	+/-1.9
Language other than English	20,475	+/-1,048	37.0%	+/-1.9
Speak English less than "very well"	8,950	+/-796	16.2%	+/-1.4
<b>Spanish</b>	16,679	+/-972	30.2%	+/-1.8
<b>Speak English less than "very well"</b>	<b>6,800</b>	+/-710	<b>12.3%</b>	+/-1.3
Other Indo-European languages	1,710	+/-506	3.1%	+/-0.9

Speak English less than "very well"	836	+/-365	1.5%	+/-0.7
Asian and Pacific Islander languages	1,363	+/-346	2.5%	+/-0.6
Speak English less than "very well"	867	+/-248	1.6%	+/-0.4
Other languages	726	+/-211	1.3%	+/-0.4
Speak English less than "very well"	447	+/-150	0.8%	+/-0.3

Source: U.S. Census Bureau, 2013 – 2017 American Community Survey 5-Year Estimate

Below please find a summary of Interviews with Department Heads and Key Staff

#### Interview Questions:

1. What is the need for language access services and policies?
2. What language access services and policies currently exist (formally or informally) throughout Lancaster City government?
3. How do the current services and policies meet the need?

#### Who was interviewed:

- Bureau Chief of Human Resources: 3/28/18
- Housing & Economic Development Administrator: 3/12/18 & 4/3/18
- Director of the Housing Equality and Equity Institute (LHOP): 3/12/18 & 4/3/18
- City Council President: 4/10/18
- City Clerk: 4/12/18
- 1<sup>st</sup> Fire Battalion Chief: 4/16/18
- Police Chief: 4/17/18
- Director of EDNR: 4/19/18
- 2<sup>nd</sup> Fire Battalion Chief: 4/19/18
- City LOOP Director: 4/25/18
- Director of DPW: 06/28/18
- City Hall Receptionist: 06/28/18

#### Interview Themes:

- The day-to-day need of translation services is felt across all departments.
- If a constituent requires translation services, they are much more likely to come in-person to City Hall for City services (as opposed to use the phone) .
- Bi-lingual staff located on the first floor have become key personnel in the provision of language access services in City Hall.
- DPW, Fire (7 firefighters across 3 shifts) and Police (15 – 20 officers out of 136) will most likely have at least one Spanish speaking employee during any given shift.
- Although staff who provide translation services do well, these duties are not explicitly in their job descriptions.
- Written translation of official documents into Spanish takes time (average 1 ½ hours per document).
- There is a need for an official translation of complicated legal documents
- Spanish is the most apparent and pressing need, however there also exists a need for Bhutanese, Indian, Pakistani, ASL (lower), Nepalese, Vietnamese, Russian and Eastern European, as well as several different dialects of Spanish.



(2) The frequency with which LEP persons encounters a federally funded activity?

Due to the high proportion of Spanish speaking persons that speak English less than “very well” within Lancaster city, Pennsylvania (the City’s service area), there is a high likelihood of interaction with LEP persons while providing direct service. Additionally, in 2016 Lancaster City reported 58% of their HUD funded program participants (who received a direct benefit) were of Hispanic ethnicity. An individual’s race and ethnicity does not reflect their language preference or ability. However, it is likely that Lancaster’s Hispanic American population includes a large percent of our city’s Spanish speakers as well as our city’s Spanish speakers who speak English less than “very well.” Therefore, a high percentage of services provided to Lancaster’s Hispanic community may demonstrate a language access need.

(3) The nature and importance of all federally funded activities or services provided by the activity:

HUD funded programs administered by Lancaster City are directed toward accomplishing:

- Decent, affordable rental and owner-occupied housing for low- and very low-income persons throughout the City;
- Upgrade public infrastructure and facilities in areas of the city principally occupied by persons with low- and very low-incomes;
- Provide human services for low- and very low-income individuals and families
- Improve accessibility for person with disabilities; and
- Support emergency shelters and improve supportive services for persons experiencing homeless or those at-risk of becoming homeless, by helping them obtain and sustain permanent housing.

These services are of high importance to many households. Due to this and to a high percent of HUD funded program participants being of Hispanic ethnicity, it is imperative that Lancaster City develop and sustain an effective Language Access Plan.

(4) Resources available and costs to recipients:

Please see main for a description of provided resources.

## APPENDIX C – INTERPRETATION DECLINATION FORM

I \_\_\_\_\_, understand that language interpretation services will be made available to me by Lancaster City for information and questions on programs available through Lancaster City **at no cost to me**.

I choose **not to use the free language interpretation services** offered to me and have decided to use the interpretation services from \_\_\_\_\_.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## **APPENDIX D – FURTHER LANGUAGE ACCESS STRATEGIES**

1. After completing the four-factor analysis and deciding what language assistance services are appropriate, a recipient may develop a LAP or Implementation Plan to address identified needs of the LEP populations it serves. Some elements that may be helpful in designing an LAP include: (1) Identifying LEP persons who need language assistance and the specific language assistance that is needed; (2) identifying ways in which language assistance will be provided; (3) providing effective outreach to the LEP community; (4) training staff; (5) translating informational materials in identified language(s) that detail services and activities provided to beneficiaries (e.g., model leases, tenants' rights and responsibilities brochures, fair housing materials, first-time homebuyer guide); (6) providing appropriately translated notices to LEP persons (e.g., eviction notices, security information, emergency plans); (7) providing interpreters for large, medium, small, and one-on-one meetings; (8) developing community resources, partnerships, and other relationships to help with the provision of LEP services; and (9) making provisions for monitoring and updating the LAP.
2. The City's Equitable Access Team is composed of internal City staff with representation from all City departments, the Human Relations Commission and the City Council. This body will help determine the severity of the identified gap, the resources available to fill the gap and the appropriate action the City should take. The City's Equitable Access Team will then report their findings to the Mayor for a determination of action to be taken.
3. Currently, different departments have separate subscriptions to different translations services. EDNR has a subscription, Fire and Police benefit from the County's Dispatch Center (who uses language line). The Language Access Coordinator may wish to investigate a Citywide subscription to translation services.
4. City Police and Fire have low-tech In-the-field translation tools such as emergency visual language translators
5. The City has developed pathways to hire more Bi-lingual Staff such as the Fire Department who gives additional points on the civil service certification to bi-lingual officers as an incentive.
  - The Language Access Coordinator may choose to investigate partnership with WLCH (SACA's Spanish radio station) for live translation/commentary, Church World Services for cultural awareness trainings and translation services, and Lancaster City School District and First Responders (EMS) who exhibits a similar translation service need

## **APPENDIX E – HUD GUIDANCE ON LEP SERVICE PROVISION – Question and Answers**

Who are limited English proficient (LEP) persons? Persons who, as a result of national origin, do not speak English as their primary language and who have a limited ability to speak, read, write, or understand. For purposes of Title VI and the LEP Guidance, persons may be entitled to language assistance with respect to a particular service, benefit, or encounter.

What is Title VI and how does it relate to providing meaningful access to LEP persons? Title VI of the Civil Rights Act of 1964 is the federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal financial assistance. In certain situations, failure to ensure that persons who are LEP can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination.

What do Executive Order (EO) 13166 and the Guidance require? EO 13166, signed on August 11, 2000, directs all federal agencies, including the Department of Housing and Urban Development (HUD), to work to ensure that programs receiving federal financial assistance provide meaningful access to LEP persons. Pursuant to EO 13166, the meaningful access requirement of the Title VI regulations and the four-factor analysis set forth in the Department of Justice (DOJ) LEP Guidance apply to the programs and activities of federal agencies, including HUD. In addition, EO 13166 requires federal agencies to issue LEP Guidance to assist their federally assisted recipients in providing such meaningful access to their programs. This Guidance must be consistent with the DOJ Guidance. Each federal agency is required to specifically tailor the general standards established in DOJ's Guidance to its federally assisted recipients. On December 19, 2003, HUD published such proposed Guidance. IV.

Who must comply with the Title VI LEP obligations? All programs and operations of entities that receive financial assistance from the federal government, including but not limited to state agencies, local agencies and for-profit and non-profit entities, must comply with the Title VI requirements. A listing of most, but not necessarily all, HUD programs that are federally assisted may be found at the "List of Federally Assisted Programs" published in the Federal Register on November 24, 2004 (69 FR 68700). Sub-recipients must also comply (i.e., when federal funds are passed through a recipient to a sub-recipient). As an example, Federal Housing Administration (FHA) insurance is not considered federal financial assistance, and participants in that program are not required to comply with Title VI's LEP obligations, unless they receive federal financial assistance as well. [24 CFR 1.2 (e)].

Does a person's citizenship and immigration status determine the applicability of the Title VI LEP obligations? United States citizenship does not determine whether a person is LEP. It is possible for a person who is a United States citizen to be LEP. It is also possible for a person who is not a United States citizen to be fluent in the English language. Title VI is interpreted to apply to citizens, documented non-citizens, and undocumented non-citizens. Some HUD programs require recipients to document citizenship or eligible immigrant status of beneficiaries; other programs do not. Title VI LEP obligations apply to every beneficiary who meets the program requirements, regardless of the beneficiary's citizenship status.

What is expected of recipients under the Guidance? Federally assisted recipients are required to make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to the recipient's programs and activities. To do this, the recipient should: (1) Conduct the four-factor

analysis; (2) develop a Language Access Plan (LAP); and (3) provide appropriate language assistance. The actions that the recipient may be expected to take to meet its LEP obligations depend upon the results of the four-factor analysis including the services the recipient offers, the community the recipient serves, the resources the recipient possesses, and the costs of various language service options. All organizations would ensure nondiscrimination by taking reasonable steps to ensure meaningful access for persons who are LEP. HUD recognizes that some projects' budgets and resources are constrained by contracts and agreements with HUD. These constraints may impose a material burden upon the projects. Where a HUD recipient can demonstrate such a material burden, HUD views this as a critical item in the consideration of costs in the four-factor analysis. However, refusing to serve LEP persons or not adequately serving or delaying services to LEP persons would violate Title VI. The agency may, for example, have a contract with another organization to supply an interpreter when needed; use a telephone service line interpreter; or, if it would not impose an undue burden, or delay or deny meaningful access to the client, the agency may seek the assistance of another agency in the same community with bilingual staff to help provide oral interpretation service.

What is the four-factor analysis? Recipients are required to take reasonable steps to ensure meaningful access to LEP persons. This "reasonableness" standard is intended to be flexible and fact-dependent. It is also intended to balance the need to ensure meaningful access by LEP persons to critical services while not imposing undue financial burdens on small businesses, small local governments, or small nonprofit organizations. As a starting point, a recipient may conduct an individualized assessment that balances the following four factors:

- The number or proportion of LEP persons served or encountered in the eligible service population ("served or encountered" includes those persons who would be served or encountered by the recipient if the persons received adequate education and outreach and the recipient provided sufficient language services);
- The frequency with which LEP persons come into contact with the program;
- The nature and importance of the program, activity, or service provided by the program; and
- The resources available and costs to the recipient. Examples of applying the four-factor analysis to HUD-specific programs are located in Appendix A of this Guidance.

What are examples of language assistance? Language assistance that a recipient might provide to LEP persons includes, but is not limited to:

- Oral interpretation services;
- Bilingual staff;
- Telephone service lines interpreter;
- Written translation services;
- Notices to staff and recipients of the availability of LEP services; or
- Referrals to community liaisons proficient in the language of LEP persons.

What is a Language Access Plan (LAP) and what are the elements of an effective LAP? After completing the four-factor analysis and deciding what language assistance services are appropriate, a recipient may develop an implementation plan or LAP to address identified needs of the LEP populations it serves. Some elements that may be helpful in designing a LAP include:

- Identifying LEP persons who need language assistance and the specific language assistance that is needed;
- Identifying the points and types of contact the agency and staff may have with LEP persons;
- Identifying ways in which language assistance will be provided;
- Outreaching effectively to the LEP community;
- Training staff;
- Determining which documents and informational materials are vital;
- Translating informational materials in identified language(s) that detail services and activities provided to beneficiaries (e.g., model leases, tenants' rights and responsibilities brochures, fair housing materials, first-time homebuyer guide);
- Providing appropriately translated notices to LEP persons (e.g., eviction notices, security information, emergency plans);
- Providing interpreters for large, medium, small, and one-on-one meetings;
- Developing community resources, partnerships, and other relationships to help with the provision of language services; and
- Making provisions for monitoring and updating the LAP, including seeking input from beneficiaries and the community on how it is working and on what other actions should be taken.

What is a vital document? A vital document is any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner. For instance, applications for auxiliary activities, such as certain recreational programs in public housing, would not generally be considered a vital document, whereas applications for housing would be considered vital. However, if the major purpose for funding the recipient were its recreational program, documents related to those programs would be considered vital. Where appropriate, recipients are encouraged to create a plan for consistently determining, over time and across its various activities, what documents are "vital" to the meaningful access of the LEP populations they serve.

How may a recipient determine the language service needs of a beneficiary? Recipients should elicit language service needs from all prospective beneficiaries (regardless of the prospective beneficiary's race or national origin). If the prospective beneficiary's response indicates a need for language assistance, the recipient may want to give applicants or prospective beneficiaries a language identification card (or "I speak" card). Language identification cards invite LEP persons to identify their own language needs. Such cards, for instance, might say "I speak Spanish" in both Spanish and English, "I speak Vietnamese" in both Vietnamese and English, etc. To reduce costs of compliance, the federal government has made a set of these cards available on the Internet. The Census Bureau "I speak" card can be found and downloaded at <http://www.usdoj.gov/crt/cor/13166.htm>. The State of Ohio Office of Criminal Justice Services, the National Association of Judiciary Interpreters and Translators, the Summit County Sheriff's Office, and the American Translators Association have made their language identification card available at [http://www.lep.gov/ocjs\\_languagecard.pdf](http://www.lep.gov/ocjs_languagecard.pdf).

How may a recipient's limited resources be supplemented to provide the necessary LEP services? A recipient should be resourceful in providing language assistance as long as quality and accuracy of language services are not compromised. The recipient itself need not provide the assistance, but may decide to partner with other organizations to provide the services. In addition, local community resources may be used if they can ensure that language services are competently provided. In the case of oral interpretation, for example, demonstrating competency requires more than self-identification as bilingual. Some bilingual persons may be able to communicate effectively in a different language when communicating information directly in that language, but may not be competent to interpret between English and that language. In addition, the skill of translating is very different than the skill of interpreting and a person who is a competent interpreter may not be a competent translator. To ensure the quality of written translations and oral interpretations, HUD encourages recipients to use members of professional organizations. Examples of such organizations are: National organizations, including American Translators Association (written translations), National Association of Judicial Interpreters and Translators, and International Organization of Conference Interpreters (oral interpretation); state organizations, including Colorado Association of Professional Interpreters and Florida Chapter of the American Translators Association; and local legal organizations such as Bay Area Court Interpreters. While HUD recommends using the list posted on <http://www.LEP.gov>, its limitations must be recognized. Use of the list is encouraged, but not required or endorsed by HUD. It does not come with a presumption of compliance. There are many other qualified interpretation and translation providers, including in the private sector.

May recipients rely upon family members or friends of the LEP person as interpreters? Generally, recipients should not rely on family members, friends of the LEP person, or other informal interpreters. In many circumstances, family members (especially children) or friends may not be competent to provide quality and accurate interpretations. Therefore, such language assistance may not result in an LEP person obtaining meaningful access to the recipients' programs and activities. However, when LEP persons choose not to utilize the free language assistance services expressly offered to them by the recipient but rather choose to rely upon an interpreter of their own choosing (whether a professional interpreter, family member, or friend), LEP persons should be permitted to do so, at their own expense. Recipients may consult HUD LEP Guidance for more specific information on the use of family members or friends as interpreters. While HUD guidance does not preclude use of friends or family as interpreters in every instance, HUD recommends that the recipient use caution when such services are provided.

Are leases, rental agreements and other housing documents of a legal nature enforceable in U.S. courts when they are in languages other than English? Generally, the English language document prevails. The HUD translated documents may carry the disclaimer, "This document is a translation of a HUD-issued legal document. HUD provides this translation to you merely as a convenience to assist in your understanding of your rights and obligations. The English language version of this document is the official, legal, controlling document. This translated document is not an official document." Where both the landlord and tenant contracts are in languages other than English, state contract law governs the leases and rental agreements. HUD does not interpret state contract law. Therefore, questions regarding the enforceability of housing documents of a legal nature that are in languages other than English should be referred to a lawyer well-versed in contract law of the appropriate state or locality.

Are EO 13166 and HUD LEP Guidance enforceable by individuals in a court of law? Neither EO 13166 nor HUD LEP Guidance grants an individual the right to proceed to court alleging violations of EO 13166 or HUD LEP Guidance. In addition, current Title VI case law only permits a private right of action for intentional discrimination and not for action based on the discriminatory effects of a recipient's practices. However, individuals may file administrative complaints with HUD alleging violations of Title VI because the HUD recipient failed to take reasonable steps to provide meaningful access to LEP persons. The local HUD office will intake the complaint, in writing, by date and time, detailing the complainant's allegation as to how the HUD recipient failed to provide meaningful access to LEP persons. HUD will determine jurisdiction and follow up with an investigation of the complaint.

Who enforces Title VI as it relates to discrimination against LEP persons? Most federal agencies have an office that is responsible for enforcing Title VI of the Civil Rights Act of 1964. To the extent that a recipient's actions violate Title VI obligations, then such federal agencies will take the necessary corrective steps. The Secretary of HUD has designated the Office of Fair Housing and Equal Opportunity (FHEO) to take the lead in coordinating and implementing EO 13166 for HUD, but each program office is responsible for its recipients' compliance with the civil-rights related program requirements (CRRPRs) under Title VI.

How does a person file a complaint if he/she believes a HUD recipient is not meeting its Title VI LEP obligations? If a person believes that a HUD federally assisted recipient is not taking reasonable steps to ensure meaningful access to LEP persons, that individual may file a complaint with HUD's local Office of FHEO. For contact information of the local HUD office, go to <http://www.hud.gov> or call the housing discrimination toll free hotline at 800-669- 9777 (voice) or 800-927-9275 (TTY).

What will HUD do with a complaint alleging noncompliance with Title VI obligations? HUD's Office of FHEO will conduct an investigation or compliance review whenever it receives a complaint, report, or other information that alleges or indicates possible noncompliance with Title VI obligations by one of HUD's recipients. If HUD's investigation or review results in a finding of compliance, HUD will inform the recipient in writing of its determination. If an investigation or review results in a finding of noncompliance, HUD also will inform the recipient in writing of its finding and identify steps that the recipient must take to correct the noncompliance. In a case of noncompliance, HUD will first attempt to secure voluntary compliance through informal means. If the matter cannot be resolved informally, HUD may then secure compliance by:

- (1) Terminating the financial assistance of the recipient only after the recipient has been given an opportunity for an administrative hearing; and/or
- (2) (2) referring the matter to DOJ for enforcement proceedings.

How will HUD evaluate evidence in the investigation of a complaint alleging noncompliance with Title VI obligations? Title VI is the enforceable statute by which HUD investigates complaints alleging a recipient's failure to take reasonable steps to ensure meaningful access to LEP persons. In evaluating the evidence in such complaints, HUD will consider the extent to which the recipient followed the LEP Guidance or otherwise demonstrated its efforts to serve LEP persons. HUD's review of the evidence will include, but may not be limited to, application of the four-factor analysis identified in HUD LEP Guidance. The four- factor analysis provides HUD a framework by which it may look at all the programs and services that the recipient provides to persons who are LEP to ensure meaningful access while not imposing undue burdens on recipients.



What is a “safe harbor?” A “safe harbor,” in the context of this guidance, means that the recipient has undertaken efforts to comply with respect to the needed translation of vital written materials. If a recipient conducts the four- factor analysis, determines that translated documents are needed by LEP applicants or beneficiaries, adopts an LAP that specifies the translation of vital materials, and makes the necessary translations, then the recipient provides strong evidence, in its records or in reports to the agency providing federal financial assistance, that it has made reasonable efforts to provide written language assistance. XXI. What “safe harbors” may recipients follow to ensure they have no compliance finding with Title VI LEP obligations? HUD has adopted a “safe harbor” for translation of written materials. The Guidance identifies actions that will be considered strong evidence of compliance with Title VI obligations. Failure to provide written translations under these cited circumstances does not mean that the recipient is in noncompliance. Rather, the “safe harbors” provide a starting point for recipients to consider:

- Whether and at what point the importance of the service, benefit, or activity involved warrants written translations of commonly used forms into frequently encountered languages other than English;
- Whether the nature of the information sought warrants written translations of commonly used forms into frequently encountered languages other than English;
- Whether the number or proportion of LEP persons served warrants written translations of commonly used forms into frequently encountered languages other than English; and
- Whether the demographics of the eligible population are specific to the situations for which the need for language services is being evaluated. In many cases, use of the “safe harbor” would mean provision of written language services when marketing to the eligible LEP population within the market area. However, when the actual population served (e.g., occupants of, or applicants to, the housing project) is used to determine the need for written translation services, written translations may not be necessary. The table below sets forth “safe harbors” for written translations.

Size of language group	Recommended provision of written language assistance
1,000 or more in the eligible population in the market area or among current beneficiaries.	Translated vital documents.
More than 5% of the eligible population or beneficiaries and more than 50 in number.	Translated vital documents.
More than 5% of the eligible population or beneficiaries and 50 or less in number.	Translated written notice of right to receive free oral interpretation of documents.
5% or less of the eligible population or beneficiaries and less than 1,000 in number.	No written translation is required.

When HUD conducts a review or investigation, it will look at the total services the recipient provides, rather than a few isolated instances.

Is the recipient expected to provide any language assistance to persons in a language group when fewer than 5 percent of the eligible population and fewer than 50 in number are members of the language group? HUD recommends that recipients use the four-factor analysis to determine whether to provide these persons with oral interpretation of vital documents if requested.

Are there “safe harbors” provided for oral interpretation services? There are no “safe harbors” for oral interpretation services. Recipients should use the four-factor analysis to determine whether they should provide reasonable, timely, oral language assistance free of charge to any beneficiary that is LEP (depending on the circumstances, reasonable oral language assistance might be an in-person interpreter or telephone interpreter line). XXIV. Is there a continued commitment by the Executive Branch to EO 13166? There has been no change to the EO 13166. The President and Secretary of HUD are fully committed to ensuring that LEP persons have meaningful access to federally conducted programs and activities.

Did the Supreme Court address and reject the LEP obligation under Title VI in *Alexander v. Sandoval* [121 S. Ct. 1511 (2001)]? The Supreme Court did not reject the LEP obligations of Title VI in its *Sandoval* ruling. In *Sandoval*, 121 S. Ct. 1511 (2001), the Supreme Court held that there is no right of action for private parties to enforce the federal agencies’ disparate impact regulations under Title VI. It ruled that, even if the Alabama Department of Public Safety’s policy of administering driver’s license examinations only in English violates Title VI regulations, a private party may not bring a lawsuit under those regulations to enjoin Alabama’s policy. *Sandoval* did not invalidate Title VI or the Title VI disparate impact regulations, and federal agencies’ (versus private parties) obligations to enforce Title VI. Therefore, Title VI regulations remain in effect. Because the legal basis for the Guidance required under EO 13166 is Title VI and, in HUD’s case, the civil rights- related program requirements (CRRPR), dealing with differential treatment, and since *Sandoval* did not invalidate either, the EO remains in effect.

What are the obligations of HUD recipients if they operate in jurisdictions in which English has been declared the official language? In a jurisdiction where English has been declared the official language, a HUD recipient is still subject to federal nondiscrimination requirements, including Title VI requirements as they relate to LEP persons.

Where can I find more information on LEP? You should review HUD’s LEP Guidance. Additional information may also be obtained through the federal-wide LEP Web site at <http://www.lep.gov> and HUD’s Web site, <http://www.hud.gov/offices/fheo/promotingfh/lep.cfm>. HUD also intends to issue a Guidebook to help HUD recipients develop an LAP. A HUD-funded recipient who has questions regarding providing meaningful access to LEP persons may contact Pamela D. Walsh, Director, Program Standards Division, HUD/FHEO, at (202) 708-2288 or 800-877-8339 (TTY). You may also email your question to [limitedenglishproficiency@hud.gov](mailto:limitedenglishproficiency@hud.gov).