

# MUNICIPALITY OF NORRISTOWN

## Consolidated Annual Performance And Evaluation Report (CAPER)



# PROGRAM YEAR 2013

# MUNICIPALITY OF NORRISTOWN

## CONSOLIDATED ANNUAL PERFORMANCE & EVALUATION REPORT (CAPER)

# PROGRAM YEAR 2013

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## **I. EXECUTIVE SUMMARY**

The Municipality of Norristown with the utilization of Community Development Block Grant funds leveraged with local, county, and state funding continued to undergo diverse changes within the first year of its five year Consolidated Plan. Additionally, other federal funding sources and private investment contributed to the economic development and revitalization of the Municipality. These successful efforts have led to the creation of new housing units by private developers, new shopping venues, new equipment and program funding for the Norristown Police Department, and further capital improvements to the aging infrastructure including the repaving of road surfaces throughout the Municipality, new sidewalks and decorative streetscapes, park and playground refurbishment, and renewed greening efforts with tree plantings.

For nearly three decades the Municipality of Norristown has suffered the ill effects a declining tax base, decaying and failing infrastructure, and lack of private investment despite serving as the county seat of Montgomery County. The rapidly aging population of the residents has also exacerbated the challenges faced by the Municipality. Activities carried out during Program Year 2013, in accordance with the 2010-2014 Consolidated Plan and 2013 Annual Action Plan, supplemented by the 2009 Norristown Economic Revitalization Strategy update, were conducted in a manner to effectively address the primary socioeconomic issues that persist within Norristown.

Utilizing program performance measurement indicators, the Municipality has initiated many activities to further national objectives of the CDBG program. These activities as specified in the Five Year Consolidated and One Year Action Plans benefit primarily low to moderate income residents and neighborhoods. The Municipality has continued to provide a suitable living environment and new availability/accessibility, affordability, and sustainability of decent housing through its Owner-Occupied Housing Rehabilitation and First Time Homebuyers Programs. Public improvements have continued with park/playground refurbishment as well as new streetscapes. In partnership with Montgomery County and other agencies, Norristown is continuing efforts to de-concentrate services inclusive of Housing Choice Vouchers for a more even distribution throughout the county. The Municipality has continued to foster the growth of economic opportunity by maintaining the Norristown Small Business Assistance Center. The 2013 CAPER will highlight how the Municipality of Norristown has succeeded in addressing the needs of the community while primarily focusing on low to moderate income households.

## **II. SUMMARY OF CDBG RESOURCES MADE AVAILABLE IN PROGRAM YEAR 2013**

### **FEDERAL CDBG ENTITLEMENT FUNDS**

The Municipality of Norristown anticipated a 2013 CDBG allocation of approximately \$758,731 as indicated in the 2013 One-Year Action Plan. The Municipality received the allocation amount of \$795,465, a difference of \$36,734.

### **2013 ACTION PLAN PROJECTS**

As part of its 2013 Action Plan and 5-year Consolidated Plan CDBG projects benefiting low/moderate income individuals include the following:

- Code Enforcement
- Housing Rehabilitation Technical Support
- Main & Marshal Streets-Lighting & Security Upgrades
- Owner Occupied Housing Rehabilitation
- Severe Service Fire Engine
- Simmons Park Improvement Project

The projects accounted for over 80% of the Municipality's 2013 CDBG allocation. Of unexpended CDBG funds at the end of Program Year 2012, \$852,829.11 was spent by the end of the 2013 Program Year. All funds were programmed and expended for activities benefiting low/moderate income households and neighborhoods within the Municipality.

### III. THREE TO FIVE YEAR ASSESSMENT OF PROGRESS

The Municipality of Norristown's priorities for allocating available Federal, State, and local resources within the jurisdiction have been made in accordance with needs as outlined in Section III of the Consolidated Plan. The Municipality will continue to stimulate its stagnant economy by rehabilitating its infrastructure and public recreational facilities to attract additional commerce and residents.

The Municipality of Norristown's 2010-2014 Consolidated Plan and the 2013 Action Plan included the following proposed community development activities.

1) **REHABILITATE AND UPGRADE THE HOUSING STOCK AND IMPROVE THE QUALITY OF LIFE IN RESIDENTIAL AREAS**

In Program Year 2013, the Municipality of Norristown was the recipient funding from a variety of federal sources to aid the improvement of quality of life within the municipality. These funding sources are listed as follows:

*Owner Occupied Housing Rehabilitation*

With the focus of improving the quality of life through housing rehabilitation, the Municipality has maintained this as a high priority initiative. The Municipality of Norristown with the adoption of the 2010-2014 Consolidated Plan, allocated and expended \$142,355 in 2013 for the rehabilitation of owner occupied housing. During program year 2013, using CDBG funding the Municipality completed four (4) single unit properties during the reporting period.

Additionally, in 2009, the Municipality of Norristown was awarded \$550,000 from the Pennsylvania Department of Community and Economic Development (DCED) to allow a community housing development organization (CHDO) to carry out housing rehabilitation for the creation of decent and affordable housing. During Program Year 2013, \$70,044.57 was expended with this project with three (3) single family dwellings under rehabilitation.

2) **PROMOTE ECONOMIC DEVELOPMENT**

a) *Norristown Small Business Assistance Center*

In February 2009 the Municipality of Norristown contracted with Widener University-Small Business Development Center to manage the Norristown Small Business Assistance Center. The center is located in the downtown business district, along Dekalb Street in an easily accessible site for residents and other potential business operators. During the past program year, twenty-six (26) clients benefited from the technical assistance provided through the SBAC leading to the

creation of six (6) low to moderate income full time jobs. Below is a summary of the clients receiving technical assistance.

Type of Business	Job Created	Family Size	Family Income (\$)	Stage
Child Care Services	0	2	19,500	Pre-Venture
Construction Planning	0	4	50,000	Start-Up
Consulting	0	2	25,000	Operational
Deli/Retail	1	4	50,000	Operational
Entertainment	0	2	45,000	Pre-Venture
Entertainment	0	Not available	Not available	Pre-Venture
Event Planning	2	2	50,000	Operational
Events/Retail/Notary	0	Unwilling to give	Unwilling to give	Operational
Food Service	0	4	5,000	Pre-Venture
Food Service	0	Unwilling to give	Unwilling to give	Pre-Venture
Entertainment Services	0	2	40,000	Operational
Media Services	0	1	35,000	Operational
Pastry Food Truck	0	2	30,000	Pre-Venture
Real Estate Development	0	1	10,000	Pre-Venture
Restaurant	0	1	55,000	Pre-Venture
Restaurant	0	1	5,000	Operational
Restaurant/Cafe'	0	1	35,000	Pre-Venture

Restaurant/Cafe'	0	Unwilling to give	Unwilling to give	Pre-Venture
Restaurant/Cater	0	2	55,000	Operational
Retail	0	2	30,000	Pre-Venture
Retail/Deli	0	Not available	Not available	Pre-venture
Salon	0	Unwilling to give	Unwilling to give	Pre-venture
Restaurant/Cafe'	1	2	30,000	Operational
Restaurant/Cafe'	0	1	25,000	Operational
Restaurant/Cafe'	0	Not available	Not available	Operational
Restaurant/Cafe'	2	4	30,000	Operational

*b) Lafayette Street Transportation Improvements*

Progress was made during Program Year 2013 with the Lafayette Street Expansion project. In FY 2005, the firm of Edwards and Kelcey of West Chester, PA completed a study entitled “*Lafayette Street: Land Access Use Study,*” which outlined the potential land access and redevelopment potential of the area along West Lafayette Street, from the river to the downtown area of Norristown.

The report included such items as: an assessment of the existing conditions of the corridor, measurements of available land, suggestions for appropriate land uses, and the identification of additional riverfront access points. Upon the report’s completion, the consultant made recommendations to the County and Municipal Steering Committee based on the outcomes of the study. The conceptual design, planning, and environmental approval phases are complete. The project will be split up into approximately four (4) phases:

1. Reconstruct existing Lafayette Street in Norristown, including new traffic signals, sidewalks, and streetscape amenities; additional parking and landscaping to be included; some open space amenities along the Schuylkill River Trail will be included.
2. Extend Lafayette Street from Ford Street to Conshohocken Road.
3. Complete the new PA Turnpike interchange and provide associated improvements along Conshohocken Road and its intersection at Ridge Pike.

4. Complete the “half diamond” interchange at the Dannehower Bridge/Markley Street (US-202).

In FY 2007, preliminary engineering was completed, and final design began in early 2008. Also in 2008 DVRPC was awarded a contract by the county to conduct a traffic study and project the impacts of the Lafayette Street Corridor Project. The final design of Phase 1 of the project, consisting of improvement to the existing portion of Lafayette Street, was completed by 2009, with construction anticipated to begin in late 2010. Construction on this section of the corridor is anticipated to last approximately two (2) years. Final design for Phases 2-3 was anticipated to be completed by late 2011, with construction beginning in early 2014, lasting approximately two (2) years.

*c) Studio Center at Logan Square*

Studio Centre at Logan Square has received a commitment of \$10 million in Redevelopment Assistance Capital Program (RACP) from the Governor. This project was originally slated to create five studios amounting to approximately 74,000 square feet of studio space, 1012 square feet of restaurant space, 70,000 square feet of retail space. The redevelopment was to expand upon the existing 100,000 square feet of existing retail and office space. Due to the weak economic market, the project focus has been reevaluated for long term viability and is now centered upon the creation of office space to serve as a corporate headquarters for USM, a global facilities maintenance and management service provider. In addition to the RACP funding, the Municipality has been approved for a \$5 million low cost HUD Section 108 loan. Upon completion is anticipated that up to 143 jobs will be created, of which 73 will be low/moderate income jobs benefitting Norristown residents.

**3) ELIMINATE CONDITIONS DETRIMENTAL TO THE PUBLIC HEALTH**

The Municipality continued to fund and administer activities that eliminated conditions detrimental to the public's health, safety and welfare. They included but were not limited to:

- Code Enforcement in Targeted Municipal Neighborhoods

The Municipality previously expanded the targeted code enforcement area to further reflect the approved studies and plans. This targeted area covers boundaries with a high concentration of low to moderate-income neighborhoods, and is congruent with the Redevelopment Area as outlined in the Riverfront Redevelopment Plan. This area also includes the PA Weed and Seed designated area, allowing for supplemental funds through the State and other sources to go towards a Truancy Abatement Initiative in the Municipality. In Program Year 2013 four code enforcement officers were funded through CDBG.

**4) UPGRADE AND REPLACE ANTIQUATED COMMUNITY INFRASTRUCTURE**

*a) Capital Streets Improvement*

Beginning in FY 2005, the Municipality undertook a Capital Streets Improvement Project, with the aim of repaving the most deteriorated roadways in Norristown. Approximately \$750,000.00 per year was budgeted for the project, garnered from a bond issue, from 2005-2008. From 2005-2011, the Municipality paved nearly sixty-two (62) miles of roadway expending over \$3.5 million in funding.. During 2012, the Municipality continued the resurfacing of roadways begun in 2010, where an additional five (5) roadways were repaved for a cost of \$584,000 covering a distance of 1.1 miles. While the program was not active during 2013, it has been revived in 2014.

*b) Main Street Streetscape Improvement*

The Municipality is committed to improving its Main Street business district, an area which currently is facing problems with blight and failing public infrastructure. As part of the Municipality’s overall revitalization strategy, Main Street was targeted for improvement, inclusive of a streetscape project along Main Street, from Markley Street to DeKalb Street.

Funding for this project was acquired from a variety of sources, including CDBG, Montgomery County Revitalization Funds, and PennDOT funds. From 2005-2008, the Municipality set aside approximately \$762,000.00 in CDBG funds. The Municipality also received a grant from the Montgomery County Revitalization in 2007 in the amount of \$487,000.00 for the project and again in 2008 for the amount of \$450,000.00. PennDOT awarded \$550,000.00 in ISTEAs funds for Phase I of the project (Cherry Street to Swede Street) and an additional \$529,840.00 in funding as part of the Hometown Streets Program for Phase II (Cherry Street to Barbadoes Street). The funding sources for Main Street Streetscape Project are summarized below:

<b>TABLE 13: MAIN STREET STREETSCAPE FUNDS</b>	
<b>FUNDING SOURCE</b>	<b>AMOUNT</b>
CDBG 2005 – 2008	\$ 762,000.00
2008 Montgomery County Community Revitalization Funds	\$ 450,000.00
2007 Montgomery County Community Revitalization Funds	\$ 487,000.00
PennDOT ISTEAs Funds (for Phase I)	\$ 550,000.00
PennDOT Hometown Streets Funds (for Phase II)	\$ 529,840.00
<b><i>Total Funding (All Phases):</i></b>	<b><i>\$ 2,788,840.00</i></b>

Preliminary design is complete for Phase II (Cherry Street to Barbadoes Street), and has been submitted to PennDOT for review. PennDOT required

an amendment to the design for revisions to crosswalk standards. Construction was completed during Program Year 2013.

Phase III (Swede to DeKalb Street) was awarded a Montgomery County Revitalization Program grant in July 2008 in the amount of \$450,000 which supplemented the available CDBG funding for the project. In December of 2008 the project was awarded to the lowest responsible bidder.

c) DeKalb Street Streetscape

In FY 2008, the Municipality continued to implement the DeKalb Street Streetscape project, which includes new sidewalks, brick pavers, crosswalks, street trees, historic lighting, benches, and trash receptacles, along DeKalb Street in Norristown. Construction began on Phases 1-2 (Chestnut Street to Basin Street) in the winter of 2006, and was completed in early spring 2007. Phases 3 & 4 (Chestnut Street to Marshall Street and Basin Street to Fornance Street) were bid in late 2007, and construction began in early-March 2008. Construction was completed on phases 3 & 4 during the fall of 2008.

Construction of Phase 5 of the project (Marshall Street southward to Lafayette Street), began in the spring of 2010. This phase of the project builds upon the foundation of the DeKalb Street and the Main Street Streetscapes which are in place, but will also develop a new and creative design for the southern portion of DeKalb Street, which will be transformed into Norristown’s “Avenue of the Arts.”

The DeKalb Street Streetscape Project has been funded utilizing CDBG, PA-DCED New Communities grant funding, and Montgomery County Community Revitalization Grant funds, as delineated in the below chart:

<b>TABLE 14: DEKALB STREET STREETSCAPE FUNDS</b>	
<b>FUNDING SOURCE</b>	<b>AMOUNT</b>
CDBG 2010	\$45,000.00
CDBG 2009	\$100,000.00
CDBG 2008	\$75,000.00
CDBG 2005-2007	\$581,943.62
2008 DCED	\$23,000.00
2005 Montgomery County Revitalization Grant	\$477,000.00
2006 Montgomery County Revitalization Grant	\$450,000.00
2007 Montgomery County Revitalization Grant	\$575,000.00
2009 Montgomery County Revitalization Grant	\$800,000.00
2011 Montgomery County Revitalization Grant	\$231,000.00
PA-DCED New Communities Grant	\$250,000.00
<b>Total Funding (All Phases):</b>	<b>\$3,607,943.62</b>

**5) EXPAND RECREATIONAL OPPORTUNITIES**

The Municipality continued to fund and administer the expansion of recreational opportunities by developing and rehabilitating park and playground facilities. The Municipality also continued seeking other sources of funds for this activity and also supported other groups in locating funds for these same purposes.

a) *Open Space Municipal-Wide Improvements*

Utilizing approximately \$1,345,353.00 of the \$1.8 million which was allocated to the Municipality by the Montgomery County Open Space Board, the Municipality is anticipating a major overhaul of all their parks in the near future. Funds will be matched using DCNR and CDBG funds for this purpose. Improvements will be focused on the following parks: Simmons Park, Skag Cottman Park, Bartasch Park, Engro/Blue Mill Field, Atkinson Field, Albert P. Parker/Cherry Street Park, Elmwood Park, and Thomas Barone Park.

Funding for these improvements is summarized in the following chart:

<b>TABLE 15: MUNICIPAL-WIDE PARK IMPROVEMENT FUNDING</b>	
<b>FUNDING SOURCE</b>	<b>AMOUNT</b>
2013 CDBG-Simmons Park	\$38,731.00
2012 CDBG-Simmons Park	\$75,000.00
2011 CDBG-Simmons Park	\$70,866.29
2010 CDBG-Simmons Park	\$237,339.39
2010 CDBG-Albert P. Parker Park (Cherry St. Park)	\$50,000.00
2007 DCNR Grant-Simmons Park	\$200,000.00
2006 CDBG	\$153,439.00
2008 Montgomery County Green Fields/Green Towns Grant	\$188,000.00
<b>Funding</b>	
<b>Total Funding</b>	<b>\$1,013,375.68</b>

lic meetings were held in the fall/winter 2007 to garner input from local residents as to what improvements they would like to see in their neighborhood parks. A list of improvements for each park was developed, and in 2008, cost estimates were prepared by the engineering consultant on the project, Remington, Vernick & Beach Engineers. The Norristown Municipal Open Space Committee then took action, allocating specific amounts of funding to each park on the list for improvements. An application was then prepared for the Montgomery County Green Fields/Green Towns grant program, and was submitted in late-February 2008. After discussions with the county and further design and engineering work on each park, a revised application was submitted in the winter of 2009. To complete the project using available funding, the Simmons Park Improvement Project has been constituted as a multi-phase project, with construction of the first phase commencing during Program Year 2010 and continued implementation of the

approved master plan during 2013.

b) ASA Softball Fields

In 2006, the Municipality started work on the creation of two baseball fields adjacent to the Elmwood Park Zoo. This would allow for the relocation of Weirman field from its site next to the Zoo, leading to expansion of parking for the Zoo and the display of additional exhibitions. This would also allow not only for the expansion plans to take place for a major destination spot in the Municipality, but also for the creation of an additional softball field for recreation purposes.

Phase I of the project, which included the creation of two regulation size softball fields, was constructed in 2007. Phase I of the project was funded by a \$960,353.00 grant from the Montgomery County Green Fields/Green Towns grant program, \$203,132.00 in funding from PA DCNR, and \$107,584.98 from the Municipal General Fund. Please see the below table which summarizes the sources of funding for Phase I of the project:

<b>TABLE 16: SOFTBALL FIELDS—Phase I FUNDS</b>	
<b>FUNDING SOURCE</b>	<b>AMOUNT</b>
Montgomery County Open Space	\$ 960,353.00
PA DCNR	\$203,132.00
Municipal General Fund	\$107,584.98
<b>Total Phase I Funding:</b>	<b>\$1,271,069.98</b>

During FY 2007 all of the County Open Space Funding was expended, in the amount of \$960,353.00. In FY 2008 the remainder of the DCNR grant was expended in the amount of \$114,100.17, which brought the project up to 100% completion for the total project amount.

Phase II of the project will include the construction of walking trails through the surrounding forest areas, which will link the ASA Softball Fields, the Elmwood Park Zoo, and the Norristown Farm Park. Design of the trails is underway, and an application was submitted to PA DCNR for grant funding for the construction of the trail system in the amount of \$49,500.00. The Municipality was awarded \$47,500.00 in FY 2008. In 2010 the consultant, Barry Issett & Associates, began environmental testing of Phase I. Following completion of the environmental testing, additional funding will be procured to construct the project.

<b>TABLE 17: SOFTBALL FIELDS—Phase II FUNDS</b>	
<b>FUNDING SOURCE</b>	<b>AMOUNT</b>
PA DCNR	\$ 47,500.00
<b>Total Phase I Funding:</b>	<b>\$47,500.00</b>

**6) PROMOTE THE PRESERVATION OF HISTORIC STRUCTURES AND NEIGHBORHOODS**

During Program Year 2013, the Municipality of Norristown continued to fund and administer activities that promoted the preservation of historic structures and neighborhoods. The Municipality requires an architectural review of all exterior modifications to structures located within the Central Norristown and West Norristown Historic Districts. The Historic Architecture Review Board (HARB), which convenes monthly, reviews any of the proposed modifications within the two historic districts to ensure that the integrity of the districts is not adversely impacted. During 2013, HARB conducted 67 reviews.

**IV. ASSESSMENT OF ANNUAL PROGRESS**

**A. AFFIRMATIVELY FURTHERING FAIR HOUSING**

**1) FAIR HOUSING LAWS**

The Federal Fair Housing Act and the Pennsylvania Human Relations Act are the two applicable laws that prohibit discrimination in housing because of race or color, national origin, religion, gender, familial status, and disability. PHRA additionally covers age (over the age of 40), ancestry, and use of a guide animal.

**2) ROLE OF THE FAIR HOUSING RIGHTS CENTER OF SOUTHEASTERN PA**

The Fair Housing Rights Center (FHRC) is a private non-profit fair housing organization located in Montgomery County. Approximately 90% of all clients that they serve are low-moderate income. The Norristown Planning Department has funded the Center with CDBG funds since May 2000. The Center's objectives in Norristown are to provide an education and outreach campaign to Norristown residents on fair housing issues in accordance with the Fair Housing Act of 1968. In the past year, the Center conducted a variety of activities with Norristown residents and agencies to educate the community about discriminatory housing practices and protections provided under applicable laws. The Center also conducted activities to inform real estate professionals and housing providers about fair housing and help them to identify discriminatory conduct with the intent to change their practices to be compliant with fair housing laws. Each year, the Center conducts fair housing compliance seminars for realtors and housing providers and also sends educational materials to local real estate agencies.

Since 2002, the FHRC has undertaken an educational outreach effort to reach landlords who have rental properties in Norristown. As part of this effort, the Center publishes an educational newsletter for housing providers and landlords. This publication is sent to every Norristown landlord identified by the Municipality as having two or more rental units in Norristown; a total of 200 Norristown landlords. This information is also sent to over 1900 additional housing providers who own rental properties in Montgomery County. Additionally the Center publishes a flyer in English and Spanish entitled, *Fair Housing – It's the Law*, which has been distributed to the Municipality of Norristown for distribution to landlords.

During Program Year 2013, the FHRC continued its education campaign with the distribution of fair housing material provided in English and Spanish to businesses and agencies in the Municipality. Workshops and educational programs continued to be offered to Norristown social service agencies, churches, neighborhood groups and residents. Public service announcements, a weekly home-seekers list, a quarterly newsletter, bi-monthly fair housing highlights, newspaper articles in the Times Herald, and SEPTA bus advertising are also part of the educational outreach strategy.

Additionally during Program Year 2013, the FHRC assisted Norristown residents with home seekers assistance, landlord tenant counseling, or information and referral. The FHRC also conducted mass advertising and outreach by attending several community fairs, publication of newsletters, bus advertising and distribution of educational materials to hundreds of Norristown residents, elected officials, government agencies and human service agencies during the grant year. A complete listing of activities the Fair Housing Rights Center performed for Norristown in Program Year 2013 is shown in *Attachment C: Fair Housing Activities (Section VII)*.

**3) DOCUMENTATION OF FAIR HOUSING COMPLAINTS**

Norristown is working with the Fair Housing Rights Center to monitor compliance with the Federal Fair Housing Act and the Pennsylvania Human Relations Act to protect its citizens from discrimination.

In Program Year 2013, the Center received fifteen (15) fair housing complaints from residents living in or trying to find rental housing in Norristown:

<b>TABLE 18: COMPLAINTS RECEIVED BY FHRC IN 2013 FROM NORRISTOWN</b>	
Total # of Complaints	15
Total # of Resolutions	12
Complaints resolved that also received referrals	5
Complaints Resolved that also received Education & Outreach	9
Complaints Resolved that also received RA/RM	0
Complaints Resolved that also received Non Specified Services	0

**4) IMPEDIMENTS TO FAIR HOUSING**

In rental housing, discrimination can occur in many different forms. The U.S. Census 2000 data noted that almost 52% of occupied housing units in Norristown were rental

units. Some of the most common discriminatory practices involve landlords or property managers setting different terms and conditions based on membership in a protected class. Some of the repeated complaints received by the Fair Housing Council in Program Year 2013, had to do with landlords not returning security deposits, which is a landlord tenant abuse, and not a fair housing violation.

a) Hispanic Population

According to available 2010 Census data, approximately 28% of the population of the Municipality of Norristown is Hispanic, the majority coming from Mexico and other Central American countries. Immigration status may hinder the likelihood of a victim filing fair housing complaints. Education and outreach to groups, churches and businesses serving the Hispanic population is crucial. Unfortunately, there is not a great deal of protection for undocumented persons filing claims. HUD's FHEO does not have a policy regarding this issue. While national origin is a protected class and there is case law that clearly states that immigration status has no bearing on a person's right to exercise their fair housing rights, fear of deportation is an obvious hindrance in the filing of complaints. An urgent issue facing Norristown at this time is a problem with landlords renting and charging exorbitant rents for substandard housing to the Hispanic immigrants. Another related problem that is becoming common is a claim by other ethnic groups is that certain landlords are terminating leases to rent to Hispanic immigrants and increasing rents and demanding payments for additional expenses such as water and sewer.

The Fair Housing Rights Center is addressing this issue in two ways:

1. By undertaking an educational campaign on the subject of "predatory landlords" to educate people on landlord tenant laws and fair housing rights.
2. By partnering with ACLAMO, a local non-profit agency that serves the Hispanic population of Norristown as part of a three year HUD funded enforcement grant, the Fair Housing Rights Center will conduct fair housing enforcement to the immigrant population in Norristown.

b) ADA Accessibility

Accessibility for persons with disabilities is a problem in Norristown due to the stock of older homes and multi-unit developments. All new multi-unit developments in Norristown are to be monitored for compliance with the Fair Housing Accessibility Guidelines. Section 504 of the Rehabilitation Act accessibility compliance must also be followed if the development receives federal money.

c) Predatory Lending/Lending Discrimination

In the area of lending discrimination, the Fair Housing Rights Center has been actively providing education about the dangers of predatory lending as a partner

with the Don't Borrow Trouble Campaign of Suburban Philadelphia (DBTSEPA), and has provided educational materials, workshops, and Public Service Announcements to Norristown residents and agencies on how to avoid being victimized by predatory lenders.



## **5) ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING IN NORRISTOWN**

### **Executive Summary**

The Municipality of Norristown, Pennsylvania is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to "affirmatively further fair housing," each entitlement community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice and take steps to affirmatively further fair housing. HUD advises communities that the Analysis of Impediments to Fair Housing should also address "Visitability," the Section 504 Rehabilitation Act, the Americans with Disabilities Act, as well as the Fair Housing Act.

HUD's Fair Housing and Equal Opportunity (FHEO) Office is now advising federal entitlement communities to update their Analysis of Impediments (AI) to Fair Housing Choice with the preparation of their Five Year Consolidated Plans, and then every five (5) years thereafter. In addition, each year Norristown, as part of its Annual Action Plan, must certify that the municipality will affirmatively further fair housing. This means that Norristown will conduct an Analysis of Impediments to Fair Housing Choice (AI), take appropriate actions to overcome the effects of any impediments identified through the AI, and maintain records reflecting what analysis and corrective actions were taken.

The Municipality of Norristown previously prepared an Analysis of Impediments to Fair Housing Choice in 2010. The U.S. Department of Housing and Urban Development (HUD) has asked the Municipality to update its Analysis of Impediments based on changes that HUD has made in reviewing a community's A.I. since the Westchester County, NY Case. Norristown has prepared this 2012 Update to the Analysis of Impediments to Fair Housing Choice to focus on the status and interaction of six (6) fundamental conditions within the Municipality of Norristown:

- The sale or rental of dwellings (public or private);

- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

Norristown is the County Seat of Montgomery County, Pennsylvania. It is a built-up urban area, while most of Montgomery County is suburban with large open tracts of land. The Municipality of Norristown has 57.6% of its population classified by HUD as low- and moderate-income, compared to Montgomery County which has a 28.6% low- and moderate-income population (including Norristown's population), and 27.3% excluding Norristown's low- and moderate-income population. Montgomery County's low- and moderate-income universe population is 207,809 out of a total universe population of 726,730 persons. The Municipality of Norristown's low- and moderate-income population is 17,453 out of a total universe population of 30,279 (57.64% low- and moderate-income percentage). Norristown's total population is only 4.2% of the County's total population, however, it has 8.4% of the County's total low- and moderate-income population, which indicates a disproportionate share of the County's low- and moderate-income persons live in Norristown.

Montgomery County is designated by HUD as an urban county and is a direct Federal entitlement. Montgomery County has to prepare its own separate A.I., which it is in the process of revising. It has not been released for public comment. In that document, the County will demonstrate what it is doing to affirmatively further Fair Housing outside the Municipality of Norristown in non-impacted areas.

Norristown has been experiencing a slight growth in its population over the last 20 years. However, this growth has been the result of a more transient population. The number of owner occupied housing units has been decreasing during this time period and the number of rental housing units has been increasing. As of the 2010 U.S. Census, there were 13,420 total housing units (89.1% were occupied and 10.9% were vacant). Of the occupied units in 2010, 41.5% were owner occupied and 58.5% were renter occupied.

Compared to the 2000 U.S. Census data, the municipality lost only 103 total housing units, but there was a 6.6% decline in home ownership and a corresponding increase in the number of rental units, while only a 0.2% decline in the vacancy rate. This loss of home ownership has created disinvestment in the community as a result of the conversion of single family homes into apartments. This increase in the number of rental units has put an increased demand on the community's aging infrastructure.

Within the municipality, there are large concentrations of poverty and the minority population, as compared to the rest of Montgomery County. The Montgomery County Housing Authority administers 2,625 Section 8 Housing Choice Vouchers (HCV) for Montgomery County, of which 1,115 HCVs are being used for housing units in Norristown (42.5% of all Section 8 HCVs). However, there are only 6,994 occupied rental units in Norristown, which is 8% of all occupied rental units in Montgomery County (82,749 units), but the municipality has the greatest share of all Section 8 HCVs. Considering the fact that there are 6,994 occupied rental units in the Municipality of Norristown, the 1,115 Housing Choice Vouchers used in Norristown comprise 15.9% of all occupied rental units in Norristown. For this reason, the Housing Choice Vouchers may affect the local rental market in regard to rental rates since the HUD Fair Market Rents (FMRs) are based on the Philadelphia FMRs for the metropolitan area, which traditionally were higher than the rental rates in Norristown. This may have caused the local rents to increase to the Philadelphia FMRs. The MCHA insists that this is not the case since it performs a rent reasonableness evaluation of the rental units before a Housing Choice Voucher holder moves into the housing unit. However, the large amount of Housing Choice Vouchers further adds to the concentration of lower income households in the municipality.

Based on the latest available census data, Norristown's Black or African American population is 12,310 persons, 35.9% of the total community population and the Hispanic population consists of 9,714 persons, or 28.3% of the total population. Compared to Montgomery County, there is a large disparity in the number of minorities and Hispanics. Montgomery County's Black or African American population is 69,351 persons (including Norristown), which is 8.7% of the total county population. Without including Norristown's population, the County's Black or African American population is 57,041 or only 8.1% of the total County population. Norristown's Black or African American population is 17.75% of the County's total minority population. In addition, there are 34,233 persons who are Hispanic and living in Montgomery County (including the Municipality of Norristown) or 4.3% of the total county population. According to the 2010 U.S. Census, there were 9,744 Hispanics living in Norristown, which is 28.5% of the total Montgomery County Hispanic population.

Norristown has only 30,279 residents which is 4.2% of the County's total population, yet it has 8.4% of the County's total low- and moderate-income population; 42.5% of all

Section 8 Housing Choice Vouchers in the County; 17.75% of County's Black or African American population; and 28.5% of all Hispanics living in Montgomery County. The concentration of minorities, Hispanics, and low- and moderate-income persons in Norristown, as compared to Montgomery County as a whole, demonstrates a need to provide opportunities for mobility outside the impacted areas in Norristown. It also illustrates the need for a coordinated and cooperative approach between the Municipality of Norristown and Montgomery County, in order to affirmatively further fair housing in both the municipality and the County. This is the basis for the first impediment listed in this A.I.



The Fair Housing Act was originally passed in 1968 to protect buyers and renters from discrimination from sellers and landlords by making it unlawful to refuse the sale or rental of a property to a person based on their inclusion in a protected class. The Fair Housing Act prohibits discrimination against persons based on their:

- race,
- color,
- religion,
- sex,
- national origin,
- disability,
- or familial status in the sale, rental, and financing of housing.

The methodology employed to undertake this Analysis of Impediments included:

- **Research**
  - A review of the Municipality's 2010 Analysis of Impediments to Fair Housing Choice, the Municipality's Zoning Ordinance, the Municipality's Comprehensive Plan, as well as a review of the FY 2010-2014 Consolidated Plan, FY 2011 Annual Action Plan, FY 2012 Annual Action Plan, and Consolidated Annual Performance Evaluation Reports for FY 2007 through FY 2010.
  - A review of the Montgomery County Housing Authority policies and procedures in the Admission and Continued Occupancy, and the Housing Choice Voucher Administrative Plan.
  - The most recent demographic data for the Municipality of Norristown was analyzed from the U.S. Census, which included general, demographic, housing, economic social, and disability characteristics.

- A review of the residential segregation data from CensusScope was completed.
- A review of the U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (HUD-CHAS) data was undertaken.
- A review of financial lending institutions through the Home Mortgage Disclosure Act (HMDA) database was completed.
- A review of the real estate and mortgage practices was undertaken.
- Home mortgage foreclosure data was reviewed.
- A review of the Montgomery County MH Program FY 2013-2017, Mental Health Plan.

- **Interviews & Meetings**

- Meetings and/or interviews were conducted with the Montgomery County Housing Authority; Accion Communal Latino Americana de Montgomery County (ACLAMO); Community Action Development Commission (CADCOM); Fair Housing Rights Center of Southeastern Pennsylvania; Fair Housing Council of Montgomery County; Montgomery County Aging and Adult Services; Montgomery County Association of Realtors; Montgomery County Housing Coalition; Legal Aid of Southeastern Pennsylvania; Montgomery County Planning Commission; Inter-Faith Housing Alliance (I-FHA); United Way of Southeastern Pennsylvania; Laurel House; Salvation Army; Equality PA; Ministerium; Women’s Center of Montgomery County - Norristown Branch; Montgomery County Foundation – MBF Center Fund; community, social service, and advocacy agencies for the disabled; housing providers; Municipality staff members.
- Surveys were sent to each housing, social service, and community development agency that was invited to the roundtable discussions.
- The following agencies were in attendance for the roundtable meetings: Norristown Borough Town Watch; Montgomery County Redevelopment Authority; Habitat for Humanity of Montgomery County; Municipality of Norristown Planning Department; Montgomery County Department of Housing and Community Development; and Genesis Housing Corporation.
- Follow up phone calls were made when an organization neither returned a survey nor attended a meeting.

- **Analysis of Data**

- Low- and moderate-income areas were identified and mapped.
- Concentrations of minority populations were identified and mapped.

- Concentrations of owner-occupied and renter-occupied housing units were identified and mapped.
  - Locations of Housing Choice Voucher units by census tracts.
  - Fair housing awareness in the community was evaluated.
  - Distribution of public and assisted housing units was analyzed and mapped.
  - The location of CDBG expenditures throughout the Municipality was analyzed.
  - The location of HOME expenditures throughout the Municipality was analyzed.
  - The Municipality's Five Year Goals and Objectives were reviewed.
- **Potential Impediments**
    - Public sector policies that may be viewed as impediments were analyzed.
    - Private sector policies that may be viewed as impediments were analyzed.
    - The status of previously identified impediments were analyzed.
- **Citizen Participation**
    - Electronic copies of a citizen fair housing survey was made available on the Municipality of Norristown's website and distributed to several social service and housing agencies throughout the Municipality to encourage citizen input.
    - The draft 2012 Update to the Analysis of Impediments to Fair Housing Choice was made available on the Norristown's website and hardcopies were placed at the:
      - **Norristown Municipal Building**  
235 East Airy Street  
Norristown, PA 19401
      - **Montgomery County – Norristown Public Library**  
1001 Powell Street  
Norristown, PA 19401

This was done to gather additional public comment on the AI Plan. The display period was from Friday, February 1, 2013 through Friday, February 15, 2013. A public hearing was held on February 19, 2013
    - The Analysis of Impediments was approved by the governing body at its meeting of April 19, 2013.

The Municipality of Norristown's 2012 Update to the Municipality's Analysis of Impediments to Fair Housing Choice has identified the following fair housing impediments, as well as defining specific goals and strategies for the community to address each impediment.

- **Impediment 1: Need for a Countywide Approach to Affirmatively Furthering Fair Housing.**

The housing, racial and socio-economic data from the U.S. Census of 2010, as well as the amount of subsidized housing in the Municipality of Norristown illustrates that there is a concentration of low- and moderate-income persons, minorities, and Hispanics living in the Municipality as compared to Montgomery County as a whole.

**Goal:** Provide housing and economic opportunities for low- and moderate-income persons and the protected classes to live and work outside impacted areas.

The strategies to meet this goal include:

- **1-A:** Establish an Affirmatively Furthering Fair Housing (AFFH) Task Force for Montgomery County with representatives from the Municipality of Norristown, Montgomery County, U.S. Department of Housing and Urban Development (HUD), the two Fair Housing agencies, the Montgomery County Housing Authority (MCHA), and the other two federal CDBG Entitlement Communities in Montgomery County.
- **1-B:** The AFFH Task Force should review the mobility policies and procedures of the Montgomery County Housing Authority to encourage and support low- and moderate-income Housing Choice Voucher holders to move outside racially and economically impacted areas in Montgomery County.
- **1-C:** The four (4) federal Entitlement jurisdictions: Montgomery County, Norristown, Lower Merion and Abington should coordinate and cooperate in the preparation and implementation of their individual Analysis of Impediments (A.I.) and/or prepare and adopt a joint A.I. in the future.
- **1-D:** The four (4) federal Entitlement jurisdictions should work together to promote and encourage the development of affordable housing throughout Montgomery County in areas that are not economically or racially impacted.

- **Impediment 2: Need to Analyze Private Lending and Insurance Practices.**

The HMDA data suggests that there is a disparity between the approval rates of home mortgage loans originated from white and those originated from minority applicants, and furthermore, based on testing performed by the Fair Housing

Council of Suburban Philadelphia (FHCSP), there appears to be discrimination in obtaining insurance quotes.

**Goal:** Approval rates for all originated home mortgage loans and homeowner insurance will be fair, unbiased and equal, regardless of race, familial status, and location.

The strategies to meet this goal include:

- **2-A:** The Municipality should undertake or contract with an outside independent agency or firm to conduct an in depth review of the mortgage lending practices of the local banks and financial institutions.
- **2-B:** Testing should be performed by an outside independent agency to determine if any patterns of discrimination are present in home mortgage lending practices and insurance underwriting of properties located in lower income areas of the municipality.
- **2-C:** If Federal and State funding becomes available, a higher rate of public financial assistance should be provided to potential homebuyers in lower income neighborhoods to improve the loan to value ratio, so that private lenders will increase the number of loans made in these areas.
- **2-D:** The Municipality has limited CDBG funds, so it should continue to fund its community improvement programs in targeted low-income neighborhoods to improve public safety protection in these areas which will reduce the insurance risk factors for homeowner insurance underwriting.

• **Impediment 3: There Is a Lack of Financial Resources.**

The Federal Government continues to reduce the amount of CDBG and HOME funds in HUD's annual budget, which reduces the allocations to entitlement communities, thus putting a strain on limited financial resources due to the housing crisis and increased unemployment.

**Goal:** Increase federal funding for the CDBG and HOME Programs to pre- FY 2010 budget levels which will allow entitlement communities to better achieve their housing and community development goals.

The strategies to meet this goal include:

- **3-A:** Contact the Congressmen from Pennsylvania and Montgomery County to increase the appropriations for the CDBG and HOME programs.
- **3-B:** Encourage and support non-profit housing agencies to apply for funding for housing from federal, state, and private foundation

resources to promote and develop affordable housing throughout Montgomery County, but outside impacted areas.

- **3-C:** The Montgomery County Housing Authority and the Montgomery County Department of Housing and Community Development should promote, support, and partner with private developers to build affordable housing using the Low Income Housing Tax Credit (LIHTC) Program throughout Montgomery County, but outside impacted areas.
- **3-D:** Cooperate with Montgomery County and the other two federal CDBG Entitlement Communities in Montgomery County to pool resources and leverage private funds to develop affordable housing outside impacted areas throughout Montgomery County.

- **Impediment 4: Continue Fair Housing Education and Outreach.**

There is a continuing need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents and the Hispanic population.

**Goal:** Improve the public's and local official's knowledge and awareness of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing in the community.

The strategies to meet this goal include:

- **4-A:** Continue to promote Fair Housing awareness through seminars and training to provide educational opportunities for all persons to learn more about their rights under the Fair Housing Act, the Americans With Disabilities Act, Violence Against Women Act, and the PA Human Relations Act.
- **4-B:** Continue to make available to and distribute literature and informational material, in English and Spanish, to pass out, concerning fair housing issues, an individual's housing rights, and responsibilities to affirmatively further fair housing.
- **4-C:** Include a link on the municipality's website that will provide information on Fair Housing, a person's housing rights, and who to contact in cases of suspected housing discrimination.
- **4-D:** Continue to contract with the Fair Housing Rights Center to provide testing services, referrals, and assistance in resolving Fair Housing complaints that may arise in the municipality.
- **4-E:** Educate and promote that all residents have a right to live in any community in Montgomery County, especially outside impacted areas.

- **Impediment 5: Need to Address Public Policies and Regulations.**

The Municipal Zoning Ordinance is outdated and needs to be revised. Norristown is in the process of reviewing and re-writing its zoning ordinance to bring it into compliance with the Fair Housing Act. Several key sections have been completed over the past ten months, and the final revised document will be available for public comment in 2013. Other municipal policies and ordinances need to be reviewed and revised if necessary, in order to affirmatively further fair housing.

**Goal:** The Municipal Zoning Ordinance and other policies and ordinances will promote affordable housing and affirmatively further fair housing in order to meet the needs of all residents in Norristown.

The strategies to meet this goal include:

- **5-A:** The municipality in its review and revisions to the Zoning Ordinance should change the definition of the word “Family” to permit six (6) or less disabled persons to live together and be considered as a single family unit. Other definitions should also be added to the Zoning Ordinance, including: “Accessibility”, “Americans with Disability Act (ADA)”, “Disability (Disabled or Handicapped Person)”, “Fair Housing Act”, “Handicap”, “Section 504 Rehabilitation Act”, and “Visitability”.
- **5-B:** The municipality should review and consider expanding locations where group homes are permitted. Presently, group homes are only permitted in the “TR – Town Residential District”. This is a very small area located in the center of Norristown, north of the Central Business District. This area also has the highest percentage of minority concentration and over 70% low- and moderate-income. Group homes should be permitted in other residential districts that permit duplexes or multi-family housing, and areas that are not impacted. Group homes need to be located throughout Montgomery County and this need should be brought to the attention of Montgomery County Planning Commission to address on a countywide basis.
- **5-C:** The specific use regulations found in §320-135 of the Zoning Ordinance should be revised and reworded, since establishing minimum distance requirements between group homes is in violation of the Fair Housing Act.
- **5-D:** The recently enacted Ordinance No. 12-03 of 2012 which amended the Rental Property Law of Norristown was controversial. The municipality has since repealed that Ordinance. The municipality needs to continue its review of other policies and ordinances to protect the rights of its residents. The Fair Housing Rights Center (FHRC) provided technical assistance in revising the ordinance.

- **Impediment 6: There Is a Continuing Need for Affordable Rental Housing.**

The Municipality of Norristown has the greatest supply of affordable rental housing in the County. However, the monthly cost of rent for apartments has steadily increased to the point that over 65.5% of all renter households in Norristown with incomes less than 50% of the median income are considered cost overburdened.

**Goal:** Additional affordable rental housing will be developed outside impacted areas throughout Montgomery County, especially for households whose income is less than 50% of the median income and the disabled, through new construction (in-fill housing) and the rehabilitation of vacant buildings and mixed-use buildings to reduce the number of lower income households who are cost overburdened.

The strategies to meet this goal include:

- **6-A:** Support and encourage both private developers and non-profit housing providers to develop plans for the construction of new affordable mixed income rental housing that is located outside of areas with lower income concentrations throughout Montgomery County.
- **6-B:** Continue to support and encourage the rehabilitation of existing housing units in Norristown to become decent, safe, and sound rental housing that is affordable to lower income households.
- **6-C:** Continue to encourage the development of group homes for the disabled outside impacted areas throughout Montgomery County and de-concentrate housing for the disabled by working with Montgomery County to provide satellite services and transportation for the disabled so they can reside anywhere in Montgomery County.
- **6-D:** Provide financial assistance to low-income households that are cost overburdened, particularly those households whose incomes are at or below 50% of the area's median family income to reduce the cost for their housing.

- **Impediment 7: There Is a Continuing Need for Affordable Housing for Sale.**

The median value and cost to purchase and maintain a single family home in Norristown that is decent, safe, and sound, has increased significantly to over \$100,000, and it is even higher in Montgomery County, which limits the choice of housing for lower income households to impacted areas in Norristown.

**Goal:** Promote the development of for-sale single family homes for lower income households through new construction, in-fill housing, and rehabilitation of vacant houses, outside areas of low-income concentration throughout Montgomery County.

The strategies to meet this goal include:

- **7-A:** Continue to support and encourage plans from both private developers and non-profit housing providers to develop and construct new affordable housing that is for-sale and which is located outside areas with lower income concentrations throughout Montgomery County.
- **7-B:** Continue to support and encourage the acquisition, rehabilitation and resale of existing housing units to become decent, safe, and sound for-sale housing that is affordable to lower income households, especially in Norristown.
- **7-C:** Partner with Montgomery County to provide financial assistance in the form of down payment assistance and low interest loans to lower income households to become homebuyers anywhere in Montgomery County, but outside impacted areas.
- **7-D:** Continue to support homebuyer education and training programs to improve homebuyer awareness and increase the opportunities for lower income households to become homebuyers and move outside areas of low-income concentrations.

- **Impediment 8: There Is a Continuing Need for Accessible Housing Units That Are For-Sale or Rent.**

As an older built-up urban environment, there is a lack of accessible housing units and developable sites in Norristown, since 69.2% of the municipality's housing units were built over 50 years ago and do not have accessibility features.

**Goal:** Increase the number of accessible housing units through new construction and rehabilitation of existing housing units for the physically disabled.

The strategies to meet this goal include:

- **8-A:** Continue the on-going programs to increase the amount of accessible housing through the rehabilitation of the existing housing stock by providing low-interest loans or grants to homeowners and landlords who will make handicap improvements, and will keep their rents affordable.
- **8-B:** Increase the amount of accessible housing through new construction of handicap units that are accessible and visitable through financial or development incentives on available vacant and developable land in Montgomery County.
- **8-C:** Continue to enforce the ADA and fair housing requirements for landlords to make "reasonable accommodations and modifications" for

their rental properties so they are accessible to tenants who have a disability.

- **8-D:** Continue to provide financial assistance to elderly homeowners in Norristown to make accessibility improvements to their properties in order for these residents to remain in their own homes.

- **Impediment 9: The Effect of the De-Institutionalization of Norristown State Hospital Patients.**

With the reduction in the number of in-patients that will be housed in the state mental health care facility in Norristown, there is the possibility that the dispersal will be into the surrounding neighborhoods where there are more rental units than single family homes and the area is already impacted.

**Goal:** Decent, safe, sound, and affordable housing opportunities will be made available to those congregate living residents who will be de-institutionalized.

The strategies to meet this goal include:

- **9-A:** The Municipality of Norristown has been excluded from the planning efforts being developed by the State and County. Norristown should notify the State and County that it wants to be a partner in the planning process to develop and support a coordinated plan for the dispersal and de-institutionalization of the existing residents who are residing at the state mental hospital.
- **9-B:** Montgomery County and the Municipality of Norristown will need to amend their Five Year Consolidated Plan in regard to the required section entitled “Development and Implementation of a Discharge Coordination Policy.”
- **9-C:** Montgomery County needs to conduct public meetings with municipal and county residents of the surrounding areas to present the dispersal and de-institutional action plan for the re-housing of these former residents into the community.
- **9-D:** Promote and encourage a plan for the development of new affordable housing for the former residents of Norristown State Hospital into areas outside concentrations of low-income households in Montgomery County.
- **9-E:** The County and State should provide satellite services and transportation for the former residents so they can reside anywhere in Montgomery County.

- **Impediment 10: There Is a Need to Improve the Mobility and De-concentration of Lower Income Areas.**

There is a concentration of lower income households in the central and southern portions of the municipality (C.T. 2035, B.G. 4 with 81.8% low/mod population), while most of the County does not have similar concentrations of poverty as shown in the 2010 U.S. Census Data.

**Goal:** Increase the mobility opportunities of lower income households to move outside concentrated Low/Mod income areas to non-impacted areas throughout Montgomery County.

The strategies to meet this goal include:

- **10-A:** Partner with Montgomery County to promote down payment and financial assistance programs to lower income households to enable these households to move outside areas of lower income concentration into non-impacted areas of the County.
- **10-B:** Continue to support the program with the county to identify areas for the development of new affordable housing on the outskirts of the municipality and adjacent areas in the county in order to de-concentrate low-income areas.
- **10-C:** Continue to provide development and financial incentives for new development sites outside areas of lower income concentration for affordable housing for lower income households.
- **10-D:** Continue to promote and encourage mixed-income housing developments with private developers to provide housing opportunities and mobility of lower income households to move outside areas with a concentration of lower income residents throughout Montgomery County.
- **10-E:** Encourage the Montgomery County Housing Authority to participate in the HUD Housing Mobility Grant Program for Southeastern Pennsylvania, to develop a regional housing mobility program to promote housing choices in inclusive, stable, and economically prosperous communities.
- **10-F:** Continue to support the production of the *HomeSeekers List* whose monthly editions consolidate affordable housing rental listings in an effort to de-concentrate impacted areas.

## ***B. COMMUNITY HOUSING NEEDS***

### **NORRISTOWN'S HOUSING STOCK**

The 2010 Census listed a total of 13,420 housing units within the Municipality, of which 11,963 were occupied. Of these, 4,969 units were owner-occupied. The Municipality's Comprehensive Housing Affordability Strategy (CHAS) reflected over 400 of the owner-occupied units as substandard. Since the year 2000, there have been 479 new units

constructed within the Municipality of Norristown, bringing the total number of housing units to 14,110. The following table outlines the age of the Municipality's housing stock:

<b>TABLE 7: AGE OF NORRISTOWN HOUSING STOCK</b>		
<b>YEAR STRUCTURE BUILT</b>	<b>Number</b>	<b>Percent</b>
March 2008 to 2013	46	0.26%
March 2000 to 2007	441	3.15%
1999 to March 2000	31	0.22%
1995 to 1998	94	0.67%
1990 to 1994	154	1.10%
1980 to 1989	481	3.44%
1970 to 1979	1,062	7.59%
1960 to 1969	2,081	14.9%
1940 to 1959	3,393	24.2%
1939 or Earlier	6,227	44.5%
<b>Total:</b>	<b>14,110</b>	<b>100%</b>

The age of the housing stock and low to moderate income ownership has combined to create a formidable substandard housing problem. As major systems in a property deteriorate or malfunction, many of the home owners on fixed incomes or those who can be classified as low-moderate income earners, lack the resources to make necessary repairs. This in turn exacerbates the problem as repairs are put off, or made in a haphazard or piecemeal manner. These properties continue to deteriorate and homeowners are forced to live in hazardous conditions with marginal electrical systems, not designed with the capacity of modern appliances, or roofs that have deteriorated beyond repair and are causing major problems to the structural integrity of the property. In many instances these problems have caused the owners to abandon the property because of major damage. These properties have become economically unfeasible for rehabilitation, and eventually become long-term vacant properties that cause a blighting influence on a neighborhood. This problem has been compounded by the current economic crisis, and prevalence of subprime lending. While comparing Norristown with other municipalities, it a bit less of an adverse factor, with only 30% of mortgages being subprime compared with 80 to 90% in surrounding areas. .

The Municipality is committed to increasing the viability of the available housing stock by acquiring properties, rehabilitating them, and selling the properties at an affordable rate to moderate-income persons instead of demolishing the structures. In addition, the Municipality has initiated an owner-occupied housing rehabilitation program to address the housing problems of low to moderate income homeowners. Since becoming a CDBG entitlement community in 1986, Norristown has devoted a portion of its CDBG budget, and any available funding from other sources (including DCED-HOME funds) to its rehabilitation program. The Municipality has spent well over \$8 million in the last 15 years for housing rehabilitation programs.

The Municipality's secondary priority is to increase home ownership. The First-Time Homebuyers Program of down payment and closing cost assistance has served as a direct benefit for families primarily in the low and moderate-income brackets. Evidence indicates that providing down payment assistance continues to allow for a significant boost to renters, enabling them to afford the costs associated with the purchase of a home and allowing for the creation of more stable neighborhoods in Norristown.

**THE REINVESTMENT FUND—HOUSING & DEMOGRAPHIC DATA ASSESSMENT**

In 2007, The Reinvestment Fund (TRF), through a grant from the William Penn Foundation, partnered with the Municipality and Montgomery County to conduct a demographic and data study of housing and related development concerns in Norristown. The study focused on the housing market in Norristown, evaluating such issues as family income level, median home sales prices, property condition, property tenure, owner-occupied vs. rental properties, and large landlord holdings. The results of the study were then mapped utilizing Geographic Information Systems (GIS), to create an easily understandable “snapshot” of housing issues facing the different sections of the Municipality (*Please see map examples in Attachment A: Section V*).

Key positive findings of the study include:

- Norristown has experienced a significant increase in property values over the 2001-2005 period—89% or \$41,252 net average increase. This is a significant increase in relation to Norristown’s surrounding municipalities—Bridgeport Borough-70%; Plymouth Meeting-64%; East Norriton Township-59%; Upper Merion Township-48%; West Norriton Township-42%.
- Norristown had a relatively low number of sub-prime mortgages—only 30% of all loans in 2004-2006.
- Norristown’s housing stock remains affordable, particularly in comparison with its neighboring municipalities in Montgomery County, as the table below relates:

<b>TABLE 8: NORRISTOWN RESIDENTIAL TRANSACTIONS 2005-AUGUST 2007</b>			
<b>Value of Sale</b>	<b>Norristown</b>	<b>%</b>	<b>Other Surrounding Municipalities</b>
<b>Under \$120,000</b>	850	51%	7%
<b>\$120,000-\$200,000</b>	680	41%	21%
<b>Over \$200,000</b>	144	8%	72%

Some negative findings of the study include:

- Norristown is highly renter-occupied (52% of all housing units) especially in older and smaller buildings around the downtown area. In addition, thirteen (13) of the largest landlords own 11% of the approximately 7,000 renter-occupied units located in Norristown.

- Deferred maintenance, building code issues, and overcrowding are especially high in the highest density areas within the municipality—23% of all non-residential and 34% of all residential properties are in need of improvements.
- Median household income distribution & surrounding municipalities—56% of households in Norristown make less than \$50,000.00 per year, while only 35% of households in the surrounding communities (Bridgeport Borough, Plymouth Meeting, East Norriton Township, Upper Merion Township and West Norriton Township) make less than \$50,000.00 per year.

Conclusions:

- Need for concentrated efforts towards continued maintenance and rehabilitation of existing housing stock, through code enforcement efforts and other innovative local policies. Noted the need to sustain neighborhoods which may be in danger of decline, through targeted initiatives to build upon the positives of new housing stock development adjacent to declining neighborhoods. In 2010, two additional code enforcement officers were hired.
- As a result of the study conducted in 2008, during Program Year 2012 the Municipality continued its efforts of the Owner-Occupied Housing Rehabilitation Program; continuation of the First-Time Homebuyers Program; Code Enforcement in targeted neighborhoods throughout the Municipality; and upgrading antiquated community infrastructure, including parks and recreation areas. These efforts are directly reflective of our Five Year Consolidated Plans number one Short Term Objective, to “Rehabilitate and upgrade housing stock and improve the quality of life in residential areas.” The above mentioned efforts are also compliant with the Consolidated Plan’s Long Term Objective, Priority 2, “Upgrade the housing stock for residents of all income levels in order that every resident will occupy safe, healthy, and decent living quarters.”

**1) OWNER-OCCUPIED REHABILITATION—HIGH PRIORITY**

a) Rationale:

Rehabilitate substandard owner occupied units in order to preserve standard affordable units. A majority of substandard owner occupied units are occupied by low and moderate-income persons.

b) Investment Plan:

The Municipality continued the funding and administration of the Owner-Occupied Housing Rehabilitation Program in 2013. All households participating in the program are low to moderate income earners, and benefit from CDBG and HOME funds.

c) Geographic Distribution:

Municipal-wide. The Municipality provides assistance in all areas based on individual household eligibility and availability of funds.

d) Service Delivery and Management:

The Municipality continued to administer the Owner-Occupied Housing Rehabilitation Program through a housing program consultant. The Municipality conducted monitoring reviews to determine whether the program was being carried out in accordance with its needs in the following manner:

1. The Municipality continued to require and conduct a monitoring review of monthly reports submitted by the Housing Program Consultant.
2. The Municipality reviewed and approved bills before payment on an ongoing basis.
3. The Municipality met and discussed figures and goals of the Program with the Consultant on an ongoing basis.
4. The Municipality continued to consistently seek other sources of funding for this project. In FY 2009, the Municipality applied for, and received \$300,000 in HOME funding from PA-DCED towards owner-occupied housing rehabilitation in a targeted neighborhood.

e) Proposed Accomplishments:

YEAR	# OF UNITS TO BE COMPLETED
2013	4

f) Accomplishments

Utilizing CDBG funds the Municipality completed four (4) single unit properties during the reporting period.

2) ACQUISITION/REHABILITATION/RESALE: AFFORDABLE HOUSING PROGRAM—

MEDIUM PRIORITY

a) Rationale:

Acquire and rehabilitate vacant substandard units in order to increase the affordable housing stock for moderate-income persons. Rehabilitation of these properties in the private market makes the units prohibitively expensive for moderate-income persons. The Municipality assigned this program a medium priority because almost all of the available public housing units from the Montgomery County Housing Authority have been rehabilitated. Therefore, there was not as large a concentration of resources in this area during the fiscal year.

b) Investment Plan:

The Municipality continued to fund and administer the Vacant Residential Acquisition Program. The Municipality will acquire vacant residential properties for rehabilitation and either perform the rehabilitation, or donate the properties to a non-profit agency for rehabilitation. The improved property will subsequently be sold to a moderate-income household.

As part of this initiative, in 2007, the Municipality administered a blighted property program, which focused on fifty-three (53) dilapidated and chronically vacant properties throughout Norristown. To date, private property owners have begun abatement on fifty (50) of these properties. The Municipality was awarded HOME CHDO funds in 2008 from DCED in the amount of \$530,000 for a local CHDO to acquire and rehab targeted properties. Contracts were executed in late 2009 with work commencing in 2010.

c) Geographic Distribution:

Municipal-wide, with an emphasis on blighted areas and problem vacant properties in concentrated code enforcement and Norristown Weed and Seed areas. The Municipality will acquire vacant residential properties anywhere within the Municipality provided the cost of the property is reasonable and meets the program criteria.

d) Service Delivery and Management:

The Municipality of Norristown's Planning Department staff will continue to administer the Acquisition/ Rehabilitation/ Resale program collaboratively with a CHDO.

e) Proposed Accomplishments:

YEAR	# OF UNITS TO BE COMPLETED
2013	0

f) Accomplishments:

During Program Year 2013, there were three (3) properties that were undergoing rehabilitation by the CHDO for resale to a low-moderate income first-time homebuyer family.

3) **HOME OWNERSHIP OPPORTUNITIES: FIRST TIME BUYERS ASSISTANCE**

**PROGRAM— HIGH PRIORITY**

a) Rationale:

Moderate-income renters who want to become homeowners lack sufficient down payment and closing cost funds. By providing funds for down payment

and closing costs, the Municipality will meet its objective of increasing home ownership. This program is of high priority for the Municipality because increased home ownership has been demonstrated to be an essential element in neighborhood stabilization.

b) Investment Plan:

In Program Year 2013, the Municipality continued to fund, develop and implement its First-Time Homebuyer’s Program. This program assists renters, who are low to moderate-income households, to become permanent homeowners. In addition to funding through CDBG the Municipality will continue to seek funds from other sources that include the DCED HOME program and the Montgomery County Affordable Housing Trust Fund.

c) Geographic Distribution:

Municipal-wide.

d) Service Delivery and Management

The Municipality of Norristown's Planning Department administers the program directly. The program was re-opened after incorporating the lead based paint rules and several people showed interest by picking up information packages on this program. During the program year, eligible first time homebuyers received up to \$7,500 toward down-payment and closing cost assistance for the purchase of a property in Norristown.

In addition, Montgomery County offers a similar First-Time Homebuyers program, which offers eligible homebuyers a grant of up to 10% of the sales price of the property towards closing costs. Montgomery County has also developed an innovative Employer Assisted Housing Program, which offers employees of Montgomery County up to \$15,000.00 towards the purchase of a home in either the Municipality of Norristown or the Borough of Pottstown. Both of these programs have helped to augment Norristown’s CDBG-funded First-Time Homebuyers Program, and further encourage local residents to purchase a home in the Municipality of Norristown.

e) Proposed Accomplishments:

YEAR	# OF HOUSEHOLDS TO BE ASSISTED
2013	0

f) Accomplishments:

In 2013, through the Municipality’s CDBG funded First-Time Homebuyer’s Program, there were no applications to receive assistance with down payments and closing costs.

**4) WEATHERIZATION—MEDIUM PRIORITY**

a) Rationale:

Improve low income housing by making housing stock more energy efficient and enhancing safety.

b) Investment Plan:

The Municipality of Norristown will support applications for funding for the continuance of the low-income Weatherization program by the Montgomery County Community Action Development Commission (CADCOM). All households participating in this program are low-income households.

c) Geographic Distribution:

Municipal-wide.

d) Service Delivery and Management:

The Montgomery County Community Action Development Commission (CADCOM) will continue to administer the Weatherization Program for the Municipality and Montgomery County.

e) Proposed Accomplishments:

YEAR	# OF UNITS TO BE ASSISTED
2013	10

f) Accomplishments:

During 2013, CADCOM provided Weatherization assistance to twenty-one (21) units in total within the Municipality of Norristown. Of these, fifteen (15) were owner-occupied households and six (6) were rental units.

**5) HOUSING CHOICE VOUCHERS—LOW PRIORITY**

a) Rationale:

Provide affordable low-income housing through the issuance of the Housing Choice Voucher Program.

b) Investment Plan:

The Municipality of Norristown supports the application for the current level of funding for Housing Choice Voucher Program, formerly referred within Montgomery County as Section 8 Certificates or Vouchers. The Municipality already has a large concentration of the Montgomery County's Housing Choice Vouchers. In 2013, with approximately 5% of Montgomery County's population, the Municipality had approximately 39% of the Housing Choice Voucher units, of which there were an average 1,091 units used in PY 2013. The Municipality's goal for the Housing Choice Voucher Program is de-concentration, so as to promote the use of vouchers in areas which currently

do not receive their fair share of subsidized units, and to expand the opportunities for low to moderate income households to live throughout Montgomery County.

c) Geographic Distribution:  
Municipal-wide.

d) Service Delivery and Management:  
The Montgomery County Housing Authority continues to administer the Housing Choice Voucher Program.

e) Proposed Accomplishments:

YEAR	# OF UNITS TO BE ASSISTED
2013	790

f) Accomplishments:

As of the end of the 2013 Program Year, the Montgomery County Housing Authority reported that there were 2,864 Housing Choice Vouchers under its administration. The Montgomery County Housing Authority, which oversees this program, requires an annual inspection of each property that receives a voucher and a criminal background check for each recipient. Of that figure, 1,018 Housing Choice Vouchers were utilized within the Municipality of Norristown representing 39% of the total vouchers. This is a decrease of eighty-one (81) vouchers used within the Municipality between the end of 2012 and the end of the 2013 reporting period. Of the 1,018 vouchers utilized within the Municipality, 144 or approximately 14% were utilized to assist the senior citizen population. The vouchers used were representative of 15% of all rental units and 8% of all housing units in Norristown. This finding compares to Housing Choice Vouchers encompassing 0.55% of all housing units and 2.29% of rental units in the remainder of Montgomery County excluding Norristown.

**TABLE 9: HOUSING CHOICE VOUCHERS USED IN NORRISTOWN**

Month & Year	# of Rental Units with Vouchers
March 2004	1,365
March 2005	1,298
March 2006	1,148
March 2007	1,085
March 2008	1,078
March 2009	1,244
March 2010	1,242
March 2011	1,163

March 2012	1,128
March 2013	1,094
March 2014	1,018

**6. HOMELESSNESS AND OTHER SPECIAL NEEDS STRATEGY—LOW PRIORITY**

The Municipality of Norristown has a large number of organizations offering facilities and services for the homeless and persons threatened with homelessness. The Municipality continues to provide staff time and technical assistance by actively participating in the Montgomery County Homeless Task Force projects, the Montgomery County Housing Coalition, Montgomery County Partners for Home Ownership, and the Montgomery County Continuum of Care.

***C. CONTINUUM OF CARE (COC)***

The Municipality continues to be committed to being a part of a comprehensive effort in response to the problem of homelessness within Norristown and broader Montgomery County. In 2013, Norristown was a participant in the Continuum of Care process of planning and implementation, which involved working together with both public and private agencies toward an extensive array of outreach, assessment, prevention, emergency/transitional, supportive services, and permanent housing for the homeless in the Municipality. Norristown remains a part of the Permanent Housing Subcommittee, through partnership with the Montgomery County Partners for Homeownership.

As aforementioned, the Municipality is also home to a majority of the nonprofit social-service organizations and government institutions that service this population in Montgomery County. Norristown believes in the de-concentration of the homeless population, and as an active member of the Montgomery County Continuum of Care, Norristown continues to actively advocate for homeownership and the de-concentration of the homeless. This transition is administered by non-profits throughout the region and closely monitored by the Municipality.

As in the situation of rental rehabilitation, the Norristown Municipal Planning Department currently does not fund or provide housing for the homeless or special needs population. Due to staff capacity, time and lack of expertise in these fields, the Municipality leaves the provision of these services to those more capable and able, such as Montgomery County, the Salvation Army and various other local non-profit entities in Montgomery County.

Norristown actively supports the Montgomery County Continuum of Care (COC), and will continue in as far as permanent housing for the homeless is concerned. A description of activities and funding reveals that a number of these organizations are located in Norristown, and since 1997, have received well over \$16,000,000 in funding. These organizations include:

- Community Action Development Commission (CADCOM)

- Community Housing Services, Inc.
- Coordinated Homeless Outreach Center (CHOC)
- Hedwig House
- Indian Valley Opportunity Center
- Laurel House
- Mental Health Association of South Eastern PA
- Montgomery County Family Services
- Montgomery County Department of Housing & Community Development
- Montgomery County Mental Health/Mental Retardation
- Salvation Army

To effectively gauge the needs of the homeless, the COC committee on Shelter and Transitional Housing conducted a housing inventory of Montgomery County to document all available housing assistance centers. A point in time count was conducted to determine the utilization rates of emergency shelters.

Below are the results of the Emergency Shelter utilization rates in Montgomery County for PY2013:

<b>TABLE 10: SHELTER UTILIZATION RATES- EMERGENCY SHELTER</b>	
<b>Available Beds</b>	222
<b>Point in Time – Used Beds</b>	199
<b>Utilization Rates</b>	89%

The table below demonstrates Transitional Housing Shelter utilization rates in Montgomery County in Program Year 2012.

<b>TABLE 11: SHELTER UTILIZATION RATES- TRANSITIONAL HOUSING</b>	
<b>Available Beds</b>	237
<b>Point in Time – Used Beds</b>	198
<b>Utilization Rates</b>	84%

**NON-HOMELESS SPECIAL NEEDS**

Non-homeless persons with special needs have been defined as:

- Elderly
- Frail elderly
- Persons with disabilities
- Persons with alcohol or other drug habits
- Persons diagnosed with AIDS and related diseases
- Victims of domestic violence
- Families lacking economic stability

Norristown has numerous supportive housing facilities that assist persons who are not homeless and request supportive housing and services. The utilization rates of permanent supportive housing can be found below.

<b>TABLE 12: SHELTER UTILIZATION RATES- PERMANENT SUPPORTIVE HOUSING</b>	
<b>Available Beds</b>	209
<b>Point in Time – Used Beds</b>	185
<b>Utilization Rates</b>	88%

This information has been gathered with the assistance of the Montgomery County Department of Aging and Adult services, and the Montgomery County Mental Health and Mental Retardation, Drug and Alcohol programs. The Montgomery County Mental Retardation program offers a variety of services to persons with mental retardation and their families. The overall goal of the program is to assist persons with mental retardation live in the community and achieve their maximum potential. Montgomery County operates three support coordination offices. Each office services a portion of the County. Trained professionals who assist individuals and their families in identifying needs and locating resources to meet those needs staff these offices. The central support offices for both agencies are located within the Municipality of Norristown, therefore those special needs persons that reside in the Municipality have more than adequate access to services.

**D. OTHER ACTIONS IN STRATEGIC AND ACTION PLANS**

The Municipality of Norristown has maintained its partnerships with non-profits to ensure that needs of the disadvantaged were addressed. The active partners addressing homeownership and homelessness include Montgomery County Homeless Task Force Project, Montgomery County Partners for Homeownership, and the Montgomery County Housing Coalition (Montgomery County Continuum of Care).

The following actions were undertaken or ongoing in Program Year 2013 to foster growth and maintenance of affordable housing while eliminating barriers to affordable housing:

- Completion of seven (7) properties funded through the owner-occupied housing rehabilitation program, inclusive of evaluation and reduction of lead-based paint hazards (CDBG & HOME)
- Continued support and funding of local CHDO’s utilizing PA DCED funds
- Continued funding of the Fair Housing Council of Southeastern Pennsylvania
- Administration of the Norristown Blighted Property Program that involved 50 properties
- Continuing funding of the First Time Homebuyers Program
- Continued funding of Code Enforcement activities

- Continuing funding for public infrastructure including sidewalks and parks

## **AFFORDABLE HOUSING**

As Norristown has one of the oldest housing stocks in the region, made up of predominantly row homes, by default it continues to remain affordable. All Municipal housing programs (owner occupied housing rehabilitation, acquisition/rehab/resale, scattered sites rehabilitation, first time homebuyer's down-payment and closing cost assistance) are all targeted to low and very low income households at 80% or below median income. Though the Municipality does not undertake rental housing, this need is quite adequately being addressed by housing programs within Norristown offered by Montgomery County Housing Services and the Montgomery County Housing Authority. In addition to the Municipality's First-Time Homebuyer Program, various non-profits working in Norristown are looking to provide or assist with moving renters to some type of home ownership. These include Genesis Housing Corporation (a local CHDO), Habitat for Humanity, and Montgomery County Community Action Development Commission (CADCOM). The Municipality conducts code enforcement inspections on units as needed on an ongoing basis and also continues to fund the Fair Housing Rights Center of Southeastern PA, which administers all affordable housing questions, complaints, and investigations. As always the Municipality's first priority for home ownership is given to tenants of Norristown rental housing, which is accomplished through Norristown's First Time Homebuyers Assistance Program, for low/moderate income individuals and families.

The Municipality has continued to address the elimination of barriers to affordable housing through the funding of fair housing activities. Services rendered by the Fair Housing Rights Center included outreach, counseling, information programs, and enforcement and testing to safeguard nondiscrimination of protected classes. As of February 2013 there were 1,018 utilized within the 3.5 square mile jurisdiction of Norristown out of a total of 2,864 units within Montgomery County. Out of the units within the Municipality of Norristown, 14% were for the benefit of elderly households. While addressing the elimination of barriers to affordable housing, Norristown will continue to advocate for de-concentration of these resources to allow for a more equitable distribution throughout greater Montgomery County.

## **LEAD-BASED PAINT HAZARDS**

In compliance with CDBG regulations, the Municipality performs a risk assessment on all our housing rehabilitation projects, to identify any hazards associated with Lead Paint. Of all the properties that received CDBG funding in 2013, 80% had lead hazards. In 2013 the Montgomery County Department of Health reported 35 cases of children in Norristown with elevated lead levels, exceeding 10mcg/dL out of 65 total reported cases within the county. Measures are in place to address these hazards during the rehabilitation, and the Lead Certified Inspector does a clearance test prior to the closeout of the project for the Housing Rehabilitation Program. Properties for

rehabilitation are bid out specifically to qualified Lead Paint Certified contractors. Staff members have also procured online visual assessment course certifications, and are able to do visual tests on applicable properties for our First Time Home Buyers Program.

## **EFFORTS TO OVERCOME GAPS IN INSTITUTIONAL STRUCTURE AND ENHANCE COOPERATION**

The following actions were taken by the Municipality to enhance coordination between public and private agencies to aid in overcoming gaps in institutional structure:

The following actions were undertaken or ongoing in Program Year 2013 to overcome institutional gaps in housing, homelessness and community/economic development:

- Active participant with the Montgomery County Housing Coalition
- Active participant with the Montgomery County Continuum of Care
- Active participant with the Montgomery County Partners for Home Ownership
- Partnered with Genesis Housing Corporation and the Redevelopment Authority of Montgomery County to continue the Norristown Blighted Property Project
- Partnered with The Enterprise Center for the continuation of the Norristown Small Business Assistance Center
- Participated in the PA Weed & Seed Program with non-profit groups to eliminate truancy among the youth
- Around 10 market rate residential developments under review/construction
- Partnered with Montgomery County for the implementation of various infrastructure projects including sidewalk and park improvement and also with the Lafayette Street Corridor Project

## **REDUCTION OF THE NUMBER OF FAMILIES IN POVERTY**

The Municipality's funded programs are all geared to directly or indirectly assist families in poverty. Examples of some of these programs/projects include the following:

### **1) HOUSING REHABILITATION**

Eighty percent (80%) of recipients of this activity are senior citizens, those on fixed incomes and very low incomes who are unable to repair their deteriorated properties. Assistance in the form of rehabilitation of their properties, bringing them up to code, invariably ensures stabilization leading to increased property and resale values after the repayment period.

### **2) NON-PROFITS**

Non-profits have continued to be the backbone of those in poverty, and by funding improvements to their facilities, services like job training, GED classes, ESL classes

and other forms of technical assistance, those in poverty that access these facilities are empowered and given the opportunity to move on to a higher status. Some of the non-profits funded during this reporting period included: ACLAMO, a local non-profit which serves the Hispanic/Latino population in Norristown and Montgomery County; Montgomery County Cultural Center, a local community group that works with local youth in after-school arts and theater related activities. The Opportunities Industrialization Center provides services that include a day care facility GED and ESL (English As a Second Language) programs.

### 3) SMALL BUSINESS ASSISTANCE

The Municipality will continue to provide technical assistance through the Small Business Assistance Center: on starting your own business, sources of capital, resource materials, and any other support necessary to empower those who are willing and able. The Municipality continued to partner with The Enterprise Center in assisting small business entrepreneurs and during Program Year 2013 assisted twenty-six (26) businesses while creating a minimum of six (6) new jobs.

## ***E. LEVERAGING RESOURCES***

The leveraging of resources is vital to a financially strapped community such as Norristown. With limited operating capital, competitive grants provide the backbone of public sector improvements. Improvements such as road reconstruction, sidewalk replacement, housing rehabilitation, enhancement/preservation of open space, historic façade improvements, computer and other information technology end-user enhancements, and criminal justice programs are some of the projects and programs that Norristown has recently applied for on a competitive basis. In addition the Municipality generates program income from persons purchasing rehabilitated properties through the acquisition/rehab/resale and Norristown/MCHA scattered sites programs, and payoffs from liened properties that are sold before the affordability term is up. The Municipality leverages Historic Facade Improvements funds with private funds, by requiring a dollar for dollar match of up to \$5,000.00 for all eligible applicants to the program. Additionally, the First Time Home buyers program requires a 3% down-payment match. With extremely limited funding availability, Norristown has been able to successfully leverage funds to demonstrate required “matches” above and beyond the minimally required funding levels. Without CDBG funds Norristown would have an arduous time beginning projects and programs let alone completing them.

The following table will demonstrate fund leveraging in Program Year 2013:

<b>TABLE 19: FUND LEVERAGING IN PROGRAM YEAR 2013</b>				
<b>Project Title</b>	<b>CDBG Amount</b>	<b>Leverage Source</b>	<b>Leverage Amount</b>	<b>Leverage %</b>
Code Enforcement	\$ 160,000.00	Municipal General Fund	\$ 160,000.00	100%

Dekalb Street Avenue of the Arts-Phase I	\$ 45,000.00	CRP	\$ 800,000.00	1800%
Simmons Park Improvement Project	\$ 237,339.39	DCNR	\$ 200,000.00	84%
		County	\$ 188,000.00	79%
<b>Totals:</b>	<b>\$ 437,339.39</b>		<b>\$ 1,343,000.00</b>	<b>433%</b>

### OTHER FEDERAL FUNDS

Department of Justice, Office of Justice Programs—Justice Assistance Grant

During Program Year 2013, the Municipality of Norristown, in conjunction with the Borough of Pottstown, was awarded a Justice Assistance Grant (JAG) through the US Department of Justice in the amount of \$54,137. To date \$27,805.00 of the Norristown allocation has been expended.

During Program Year 2012, the Municipality of Norristown, in conjunction with the Borough of Pottstown, was awarded a Justice Assistance Grant (JAG) through the US Department of Justice in the amount of \$57,116. To date \$31,312.45 of the Norristown allocation has been expended.

During Program Year 2011, the Municipality of Norristown, in conjunction with the Borough of Pottstown and the Township of Cheltenham, was awarded a Justice Assistance Grant (JAG) through the US Department of Justice in the amount of \$81,289. To date \$44,257.97 of the Norristown allocation has been expended.

### COMMONWEALTH OF PENNSYLVANIA FUNDS

Pennsylvania Department of Community & Economic Development (DCED)

During Program Year 2010, the Municipality continued project the following allocations from the Pennsylvania DCED:

<b>TABLE 1: 2008-2013DCED GRANT APPLICATIONS</b>		
<b>ACTIVITY</b>	<b>REQUESTED</b>	<b>AWARDED</b>
<b>Traffic Signalization at Airy &amp; Noble Sts.</b>	\$75,000.00	\$75,000.00
<b>Norristown Blighted Property Project</b>	\$30,000.00	\$30,000.00
<b>DeKalb Street Streetscape Avenue of the Arts</b>	\$300,000.00	\$23,000.00
<b>Traffic Signalization Improvements Project - Airy Street and Noble Street - Cont'd</b>	\$75,000.00	\$75,000.00
<b>Code Enforcement Capacity Building</b>	\$60,000.00	\$60,000.00
<b>Traffic Study- DeKalb Two-Way</b>	\$25,000.00	\$25,000.00
<b>HOME CHDO Application</b>	\$550,000.00	\$550,000.00
<b>2009 Neighborhood Stabilization Program</b>	\$464,500.00	\$464,500.00
<b>HOME Housing Rehabilitation Program</b>	\$500,000.00	\$500,000.00

Pennsylvania Department of Conservation and Natural Resources (DCNR)

In Program Year 2009, the Municipality was awarded \$15,000 from DCNR to conduct a Master Plan for Riverfront Park. Through a competitive RFP process the consulting firm Johnson, Mirmiran & Thompson was selected to complete the master planning process. The study was completed during Program Year 2011 a total of three (3) public meetings were held, and one (1) meeting of the study committee was conducted.

The Municipality also submitted applications for the following grant programs during Program Year 2011 with implementation commencing during Program Year 2012:

<b>TABLE 3: 2011 DCNR GRANT APPLICATIONS</b>		
<b>ACTIVITY</b>	<b>REQUESTED</b>	<b>AWARDED</b>
<b>Greenway Trails Feasibility - Saw Mill Run/ Stony Creek</b>	\$25,000.00	\$25,000.00

Pennsylvania Commission on Crime and Delinquency (PCCD)

In Program Year 2011, the Municipality of Norristown was awarded \$155,000.00 in funding to support the Norristown Police Department's Truancy Abatement Initiative. Funds are applied for each year through the Norristown Weed and Seed Program.

Pennsylvania Department of Transportation (PennDOT)

In Program Year 2011, the Municipality was awarded \$200,000 in funding from the PennDOT-Automated Red Light Enforcement-Transportation Enhancement Grant program. This funding was leveraged with DCED funding to complete the installation of a traffic signal at the intersection of Airy and Noble Streets in Norristown. The installation of the signal was completed during Program Year 2012.

**MONTGOMERY COUNTY FUNDS**

Montgomery County Community Revitalization Funds

In Program Year 2012 the Municipality applied for a grant for the following project through the innovative Montgomery County Community Revitalization Program:

<b>TABLE 4: 2011 MONTGOMERY COUNTY COMMUNITY REVITALIZATION PROGRAM FUNDS</b>		
<b>ACTIVITY</b>	<b>REQUESTED</b>	<b>AWARDED</b>

<b>DeKalb Street Streetscape - Avenue of the Arts-Phase II</b>	\$231,000	\$231,000
<b>Bell Telephone-Arts Venue Project</b>	\$200,000	\$200,000

During FY 2012, the Municipality also had the following ongoing Montgomery County Community Revitalization Program funded projects:

<b>TABLE 5: OTHER MONTGOMERY COUNTY REVITALIZATION PROJECTS</b>	
<b>ACTIVITY</b>	<b>DESCRIPTION</b>
<b>Dekalb Street Avenue of the Arts Streetscape-Phase II</b>	Streetscape project to rehabilitate failing infrastructure on the Avenue of the Arts

Montgomery County Open Space Fund

In Program Year 2011 the Municipality initiated construction of the Simmons Park Improvement Project-Phase I, utilizing \$188,000 provided with Montgomery County Open Space program funding to further enhance recreational activity throughout the Municipality:

<b>TABLE 6: 2008 MONTGOMERY COUNTY OPEN SPACE FUNDS</b>		
<b>ACTIVITY</b>	<b>REQUESTED</b>	<b>AWARDED</b>
<b>Simmons Park Improvement Project-Phase I</b>	\$188,000	\$188,000

**OTHER FUNDS**

Tax Increment Financing (TIF)—401-403 DeKalb Street Redevelopment

Tax Increment Financing is a tool enacted into law by the Commonwealth of Pennsylvania as the TIF Act of July 1, 1990, that authorizes additional and alternative methods of financing public facilities and residential, commercial and industrial development and revitalization. This is for the purpose of providing new employment opportunities to prevent, arrest and alleviate blighted, decayed and substandard areas in the Municipalities of the Commonwealth, to increase the tax base and to improve the economies of the Commonwealth's Municipalities.

The project is located at 401-403 DeKalb Street, also known as the Bell Telephone Building. By Ordinance 08-02, Norristown Municipal Council authorized the pledge of 90% of the incremental tax revenues for the Municipality from the project, to go towards payment of the TIF debt. The project entails the utilization of 12,140 square feet for office space and a potential restaurant, and went into effect on July 1, 2008 for a period of twenty (20) years. This property has been renovated and the landlord is currently searching for suitable tenants. It is anticipated that this project will significantly enhance the real estate value of the surrounding properties and boost the revitalization efforts by the Municipality of Norristown.

## ***F. CITIZEN COMMENTS***

The Municipality of Norristown conducted an extensive public outreach effort to obtain citizen input through public meetings, town-hall styled meetings, municipal council meetings, and through local media venues. The Consolidated Annual Performance and Evaluation Report (CAPER) was also available for public review. Any comments, if any are attached as part of the cover letter.

## ***G. SELF-EVALUATION***

A review of the Municipality of Norristown's multiple years of Community Development Block Grant Funds (CDBG), and State HOME monies available to accomplish all five year short and long term strategy objectives during the program year of the Municipality's Consolidated Plan reveals that of the three main objectives outlined in 24 CFR Section 91.1(a) (provision of decent housing, a suitable environment, and expanding economic opportunities principally for low/moderate income individuals), at the beginning of a new three year certification period (2010-2014), the Municipality has surpassed its initial goals as revealed in the current reporting year (2013) of the Consolidated Annual Performance and Evaluation Report. The following are the most recognizable of these achievements:

### **1) HOUSING**

In the 2010-2014 Five Year Consolidated Plan, and 2013 One Year Action Plan:

- a) Decent, affordable housing is being provided, while at the same time deteriorated historic residential structures are being rehabilitated. Low/moderate income renters have been removed from rental housing and have become homebuyers able to take pride in owning their own homes.
- b) Because of its limited organizational capacity, the Municipality continued with its sub-grantee agreement with the Fair Housing Rights Center of Southeastern PA so as to help Norristown in accomplishing its objectives and responsibilities under the Fair Housing Act.

In an awareness campaign to fight housing discrimination, the Municipality continued to make Fair Housing literature available throughout Municipal Hall and at the Norristown Public Library. Due to the fact that so many people dealing with housing issues come to Municipal Hall, this is one of the ideal distribution methods for Fair Housing information. Funding provided to the Fair Housing Rights Center has allowed them to advertise inside SEPTA buses, which run across Norristown and throughout Montgomery County. Public service announcements cover issues related to: hate crimes, panic selling, block busting and predatory lending.

## 2) SUITABLE LIVING ENVIRONMENT

During 2010-2014, safety and livability of Norristown neighborhoods continues to be increased through enhanced police presence and patrols. In the last five years, the Municipality has increased its police capacity to 67 from 58 officers in addition to new police vehicles and increased bike patrols in the neighborhoods. The Town Watch and Block Captain programs in neighborhoods throughout Norristown continued to make a positive impact, working under the auspices of the Weed and Seed program. Other efforts included the following:

- Rehabilitation of owner occupied and vacant structures municipality-wide and in targeted neighborhoods through the HOME program
- CDBG funding for four (4) code enforcement officers, bringing the number up to a total of eight (8) officers
- Continuation of improvements to municipal infrastructure (including parks and streetscapes) through the leveraging of funds from State and County sources (please see *Section E: Leveraging Resources*).

Norristown intends to continue concentrating its efforts towards Code Enforcement, rehabilitation of owner occupied and vacant structures in targeted neighborhoods, First Time Homebuyer Programs, Historic Facades, reconstruction of antiquated municipal infrastructure, and streetscape improvements throughout the Municipality.

## 3) EXPANDING ECONOMIC OPPORTUNITIES FOR LOW/MODERATE INCOME PERSONS

### a) Small Business Assistance Center

The achievement of this goal has been discussed in depth under “Reduction of Number of Families in Poverty” section of this document (*Please see above, Section III. D. # 3*). In February, 2008 the Municipality contracted with Widener Small Business Development Center to run the Norristown Small Business Assistance Center. The Center is located in the downtown business district, along DeKalb Street in Norristown, to make it easily accessible for local residents and business owners.

### b) Business Development Coordinator

The Municipality of Norristown continues to fund a position for a Business Development Coordinator through local funds. Serving as a liaison to existing local business, new businesses looking to locate in Norristown, developers, local entities and agencies, etc., the Business Development Coordinator will work to further the goals developed in the Consolidated Plan and those outlined in the Norristown Economic Revitalization Strategy. During Program Year 2010 the Municipality commenced the process of renewing its Enterprise Zone (EZ) designation through the Commonwealth, utilizing the Business Development Coordinator position for EZ coordination.

In FY 2007, the Coordinator, working in conjunction with the Planning Department, hired The Osiris Group, of Philadelphia, PA, through a competitive RFP process to develop a marketing strategy for the Municipality. This strategy will help to improve the image of Norristown, publicize the many successes of public and private projects, and further economic development, investment and revitalization in the Municipality. In addition, the consultants developed a contest entitled “Why I Love Norristown,” which was open from May 1 through July 31, 2008. Residents, former residents, and those who work in Norristown were encouraged to enter as often as they’d like in these categories: essays (250 words or less); photography; music or performances; and drawings, illustrations or other original works of art. The following prizes will be awarded: \$1,000 grand prize, presented to the single-best entry received, regardless of category; First (\$500), Second (\$250) and Third (\$100) prizes in each of the four categories. Over 100 entries were received from participants ranging in age from 10 to 80 years old. Osiris Group assisted the Municipality with updating the municipal website, made fully operational during the summer of 2011.

c) County Seat Economic Revitalization Committee

The County Seat Economic Revitalization Committee (CSERC) continued focusing on actions necessary to implement the Revitalization Strategy recommendations related to a number of things that include the following: Steer the Norristown Economic Revitalization Strategy (NERS) by ensuring, among other things, the increase in quality of life of Municipal residents, and also ensuring that the Norristown population has job opportunities derived from implementation of activities in the Redevelopment Area.

The Norristown Economic Revitalization Strategy (NERS) was adopted in the summer of 2000, and as of the end of FY 2007 approximately 80% of the goals were complete. The updated Norristown Economic Revitalization Strategy completed and adopted in June of 2009. In Program Year 2012 the Municipality continued to implement the NERS.

d) MBE Notification for Bidding and RFPs

Norristown provides a number of organizations, including those community organizations servicing predominantly low to moderate-income populations and minority populations, with listings of each project that is advertised for bidding. These include but are not limited to the Philadelphia Minority Business Enterprise Council, The Greater Philadelphia Urban Affairs and the Philadelphia office of U.S. Dept. of Commerce, Minority Business Development Agency, Governor’s Advisory Commission on Latino Affairs, Pennsylvania Commission for Women and the Pennsylvania Bureau of Minority & Women Business Opportunities.

## **H. MONITORING PLAN**

The Municipality of Norristown's Department of Planning and Municipal Development was the department in charge of administration of the CDBG program during 2013. The department is responsible for implementation, administration, and monitoring activities related to the Five-Year Consolidated and Annual Action Plans. The department currently has three (3) full-time staff members which continue to ensure timely disbursement of grant funds. In addition to reporting to HUD, the department also reports to the municipal council as well as citizens on a monthly basis, providing updates regarding the various projects and activities underway in Norristown. To ensure cohesion within the department, at a minimum bi-weekly meetings are held to provide project updates and set goals for projects and activities.

In addition to departmental updates, sub-grantees are required to submit monthly reports and professional service consultants are also to provide updates to properly gauge project progress to report to municipal council and the public. The planning department staff also meets on the 2<sup>nd</sup> Wednesday of each month with two appointed municipal council members for the Planning and Economic Development Committee. This crucial meeting is to evaluate the goals of all active adopted plans, specifically the Five-Year Consolidated Action Plan and the Norristown Economic Revitalization Strategy (NERS) while reviewing their progress. The planning department also conducts meetings quarterly to assess the progress of CDBG related projects and the expenditure of funds to ensure that the timeliness ratio is in compliance with regulation.

#### **MONITORING OF SUB-RECIPIENTS**

In regard to monitoring sub-recipients, the following actions were conducted during Program Year 2013:

- Identified high-risk (new to program, turnover in key positions, etc) sub-recipients. These sub-recipients are subject to a more thorough review.
- For experienced sub-recipients whom had successfully carried out multiple activities and/or multiple years, we conducted narrowly focused monitoring. Examples were areas of operations where regulations had changed and/or new activities.
- Sub-recipients were informed of documents to be reviewed for compliance. This varied upon the program area that the sub-recipient was involved with.
- Reviewed CDBG applications of sub-recipients, written agreements, progress reports, and payment requests prior to conducting monitoring sessions.
- Provided notification to sub-recipients stating the date and time of monitoring sessions.
- Conducted entrance conference
- Performed documentation and analysis of contracts.

Upon completion of the monitoring, the Municipality conducted or provided:

- Exit conference
- Monitoring follow-up letter documenting the Municipality's findings.

The monitoring of our sub-recipients was for the purpose of establishing the following:

- 1) To determine if the sub-recipient was carrying out its program, and individual activities as described in the executed contract and application for CDBG assistance.
- 2) To determine if the sub-recipient was carrying out its activities in a timely manner.
- 3) To determine if the sub-recipient was charging costs to the project which are eligible under applicable laws and CDBG regulations.
- 4) To determine if the sub-recipient was conducting its activities with adequate control over programmatic and fiscal performance.
- 5) To identify potential problem areas and to assist the sub-recipient in complying with applicable laws and regulations.
- 6) To assist sub-recipients in resolving compliance problems through discussion and technical assistance.
- 7) To provide adequate follow-up measures to ensure that performance and compliance deficiencies were corrected and not repeated.
- 8) To determine if conflict of interest existed in the operation of the CDBG activity.
- 9) To ensure that any and all required documents were accurately and appropriately maintained.

## ***I. OTHER ISSUES***

1. Use of CDBG funds as compared to Consolidated Plan priorities, goals and objectives have been discussed at some length on previous pages. Most large program expenditures went to high priorities such as housing, infrastructure, and economic development, and benefited low and moderate-income priorities.
2. No changes occurred in program objectives during the fiscal year.
3. As detailed previously: All resources indicated were pursued and implemented; All viable applications on behalf of other entities were supported in a fair and impartial manner; No action, or in-actions were taken to hinder Consolidated Plan implementation in any way.

4. No funds were expended which did not address one of three national objectives.
5. During the reporting period, no activities involving displacement or relocation were undertaken.
6. Monitoring of all projects including sub-grantees was carried out during the reporting period on an ongoing basis.

#### ***J. CLOSING SUMMARY***

In all the described short and long term strategies in this analysis, the Municipality is on target with the 2010-2014 Five Year Consolidated Plan and 2013 Action Plan goals, and has surpassed those goals consistently.

Of the \$852,829.11 expended in CDBG funds during Program Year 2013 reporting period, \$636,228.07 was expended for low-mod activities. Program Year 2013 was the fourth year in the five year certification period of PY2010, PY2011, PY2012, and PY 2013. In addition, during the 2013 reporting period, \$136,538.11 (17% of funds) was expended for Planning and Administration activities. (*please see CDBG Financial Summary Report, attached in section XII*). The Municipality is taking steps to ensure that the 20% administration cap is not exceeded and that the focus continues to be for the benefit of low/moderate income beneficiaries within the certification period.

During the fourth year of the five year plan, the Municipality is ensuring that critical emphasis and coordination will be placed on implementing the 2010-2014 Five-Year Consolidated Plan in conjunction with the Norristown Economic Revitalization Strategy (NERS) to meet the needs of those in eligible areas and ensure that the low/mod criteria continues to be met. In regard to the revitalization efforts in Norristown, the Municipality will continue to be monitored by the County Seat Economic Revitalization Committee (CSERC) in order to implement the Norristown Economic Revitalization Strategy (NERS), as previously mentioned. Affirmatively furthering fair housing practices and improving coordination with local providers of transitional and permanent housing for the homeless and other special needs populations, especially through efforts by the Fair Housing Rights Center of Southeastern PA and the Continuum of Care, will also continue to be a priority. The Municipality will also continue to carry out monitoring of its projects and sub-recipients on a regular basis as delineated in its Citizen Participation Plan.