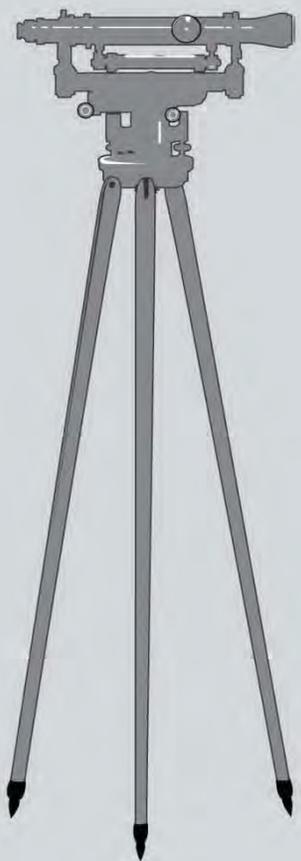


**Site and Neighborhood Standards**

Attached please find our submission regarding site and neighborhood standards for NewCourtland Apartments at Allegheny Phase 1. NewCourtland Apartments at Allegheny Phase 2 will be constructed on the same site and serve the same population.



**SHERICK Project Management Inc.**  
230 N. 2<sup>nd</sup> Street, Suite 3D  
Philadelphia, PA 19106

May 16, 2013

Mr. Laurence Redican  
Deputy General Counsel  
Philadelphia Housing Authority  
12 S. 23rd Street  
Philadelphia, PA 19103

Re: NewCourtland Apartments at Allegheny--Award of ACC Operating Subsidy  
Site and Neighborhood Standards Submission

Dear Mr. Redican:

On behalf of NewCourtland Elder Services I am submitting information with respect to the Site and Neighborhood Standards for the review of PHA and HUD for the above-referenced project. The submission responds to the excerpt from PHA's Moving to Work Plan which you provided, a copy of which is attached.

The project complies with the Fair Housing Act and Title VI of the Civil Rights Act of 1964. As part of its Affirmative Fair Housing Marketing Plan, NewCourtland Elder Services, the developer, will make widely known the availability of the housing to be constructed at this location. The neighborhood is predominantly African American. Outreach will be performed to ensure that racial groups underrepresented in the neighborhood know of the availability of the housing.

The project will be in an area certified as blighted by the Philadelphia Redevelopment Authority (PRA). A copy of the "Blight Certification for Allegheny West and Tioga" approved by the PRA is attached. The project is also located in the Philadelphia Enterprise Zone/Renewal Community, per the attached map. The site is located on the south side of Allegheny Avenue, in the "V" created by the two sets of railroad tracks that cross Allegheny Avenue between 17<sup>th</sup> St. and 20<sup>th</sup> St.

The developer, NewCourtland Elder Services, commissioned a market study to determine whether or not there was a need for housing in this area. The market study demonstrated that there is a deep need for housing of this type, particularly housing for elders that does not necessitate climbing stairs. Virtually all of the existing housing stock consists of rowhomes that are approximately 100 years old, with steps up to the entrance and no full bathroom or bedroom on the ground level.

In further support of our request, our market analyst, Real Estate Strategies, concluded that new construction is justified in order to meet the needs of elders in this community. Their letter dated May 16, 2013 is attached.

Laurence Redican  
May 16, 2013  
Page 2

Please let me know if you need anything further in order to submit this information to HUD for its review and approval.

Sincerely,

Sue McPhedran  
Senior Project Manager:

Cc: Michael Johns and Kyle Flood, PHA  
R. Max Kent, NewCourtland Elder Services

*Agency's Annual MTW Plan;*

- c. The Agency is authorized to duly adopt, according to the requirements of local law, alternate standards for determining the location of existing, newly constructed or substantially rehabilitated housing to receive subsidy; provided, however, *that in lieu of the Site Selection Standards currently set forth in 24 C.F.R. Section 983.57*, the agency will comply with the following requirements:
  - i. The Agency will comply with the Fair Housing Act and Title VI of the Civil Rights Act of 1964, and implementing regulations thereto, in determining the location of newly constructed or acquired public housing units.
  - ii. Units may be located in the agency's jurisdiction, including within, but not limited to, the following types of urban areas: (1) an area of revitalization that has been designated as such by the governing jurisdiction, including Redevelopment Areas and Enhanced Enterprise Communities, (2) an area where public housing units were previously constructed and were demolished, (3) a racially or economically impacted area where the agency plans to preserve existing affordable housing, (4) in connection with a HOPE VI or other HUD funded master planned development, (5) in areas where a needs analysis indicates that subsidized housing represents a low percentage of the total number of housing units in the area, or (6) relocating units to an area with a lower concentration of public housing units.
  - iii. Conduct a housing needs analysis indicating that there is a real need for the housing in the area; and
  - iv. When developing or substantially rehabilitating six or more Section 8 project-based units, the agency will: (1) advise current residents of the subject properties and representative community groups in the vicinity of the subject property by letter to resident organizations and by public meeting, of the agency's revitalization plan; and (2) certify to HUD in its Annual MTW Report that the comments from Residents and representative community groups have been considered in the revitalization plan. Documentation evidencing that the agency has met the stated requirements will be maintained at the housing authority and submitted to HUD in its Annual MTW Report.
- d. All units that receive project-based Section 8 assistance must meet either (i) existing HQS standards established by the Secretary or (ii) a local standard for communities receiving project-based Section 8 assistance developed by the Agency and approved by the Secretary pursuant to this MTW Agreement, as applicable. *This authorization waives certain provisions of Section 8(o)(8) of the 1937 Act and 24 C.F.R. 982 Subpart I as necessary to implement the Agency's Annual MTW Plan.*

**Blight Certification for Allegheny West and Tioga:**  
Area generally bounded by Broad Street and Germantown,  
Glenwood, Lehigh, Ridge and Hunting Park Avenues

Philadelphia City Planning Commission  
March 2003

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**Philadelphia City Planning Commission**

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*Community Planning Division*

Victoria Mason-Ailey, *Division Director*  
Richard Redding, *Deputy Division Director*

Report by:  
Cornel J. Pankey, *North Philadelphia Community Planner*

Contributions by:  
Bryan C. Lightner, *GIS Specialist*

## **Blight Certification for Allegheny West and Tioga:**

Area generally bounded by Broad Street and Germantown, Glenwood, Lehigh, Ridge and Hunting Park Avenues

Philadelphia City Planning Commission  
March 2003

### INTRODUCTION

This report presents an evaluation of blight in two large neighborhoods in North Philadelphia west of Broad Street: Allegheny West and Tioga. The blight certification boundaries are shown on page 2: the generalized boundaries are Germantown Avenue & Broad Street on the east, Hunting Park Avenue on the north, Ridge Avenue on the west and Lehigh and Glenwood Avenues to the south. The study area spans a relatively large portion of Upper North Philadelphia.

The northern part of the study area is the neighborhood of Tioga. This area was previously certified as blighted in 1970 when the Tioga Redevelopment Area was established. Therefore in Tioga, blight is being “re-certified” to make the information more current and up-to-date.

The certification study reviews existing conditions in relation to seven criteria used to determine whether blight exists in an area. The criteria are set forth in Pennsylvania Urban Redevelopment Law, which stipulates that only one of these criteria must be met to make a finding of blight in an area. The law also states that blighted conditions need not be evident throughout the area under study. The fact that individual properties are free from blight does not make the finding of blight

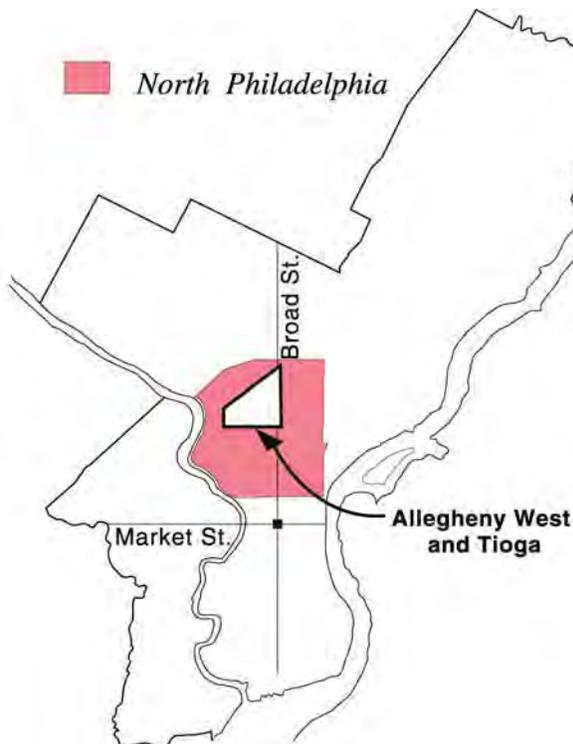
arbitrary, according to the law, because comprehensive planning requires that areas be considered in their entirety, and not in their unseverable parts.

This report cites specific examples of the conditions listed in four of the criteria. Blight does exist in the area.

### CRITERIA

Pennsylvania Urban Redevelopment Law contains the following criteria for establishing the presence of blight in a particular area:

1. Unsafe, unsanitary, inadequate or overcrowded conditions
2. Inadequate planning
3. Excessive land coverage
4. Lack of proper light, air and open space
5. Faulty street and lot layout
6. Defective design and arrangement of buildings
7. Economically or socially undesirable land use



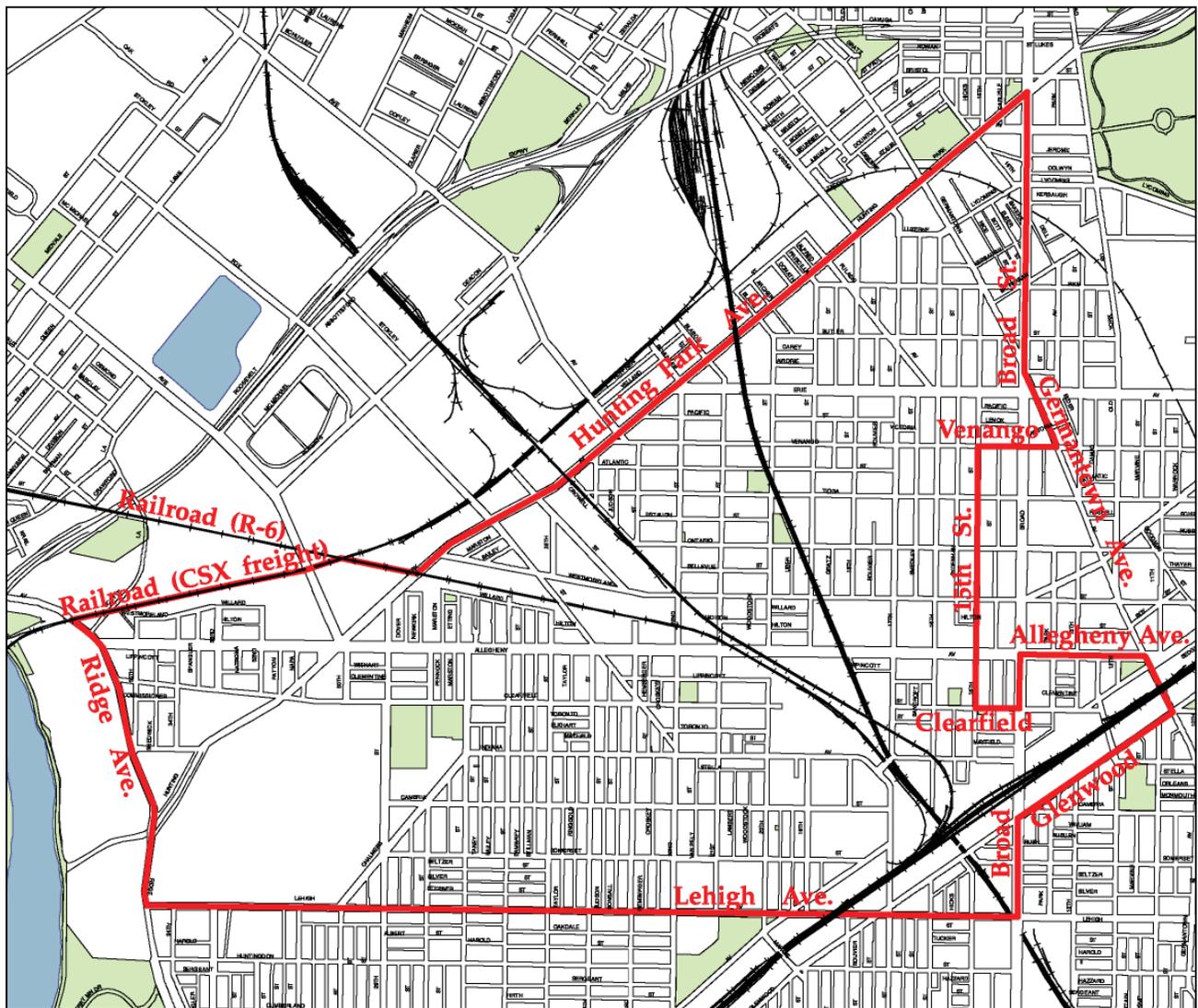
ANALYSIS

The following section describes the characteristics of blight evident in the area generally bounded by Broad Street and Germantown, Glenwood, Lehigh, Ridge and Hunting Park Avenues.

1. Unsafe, Unsanitary, Inadequate or Overcrowded Conditions

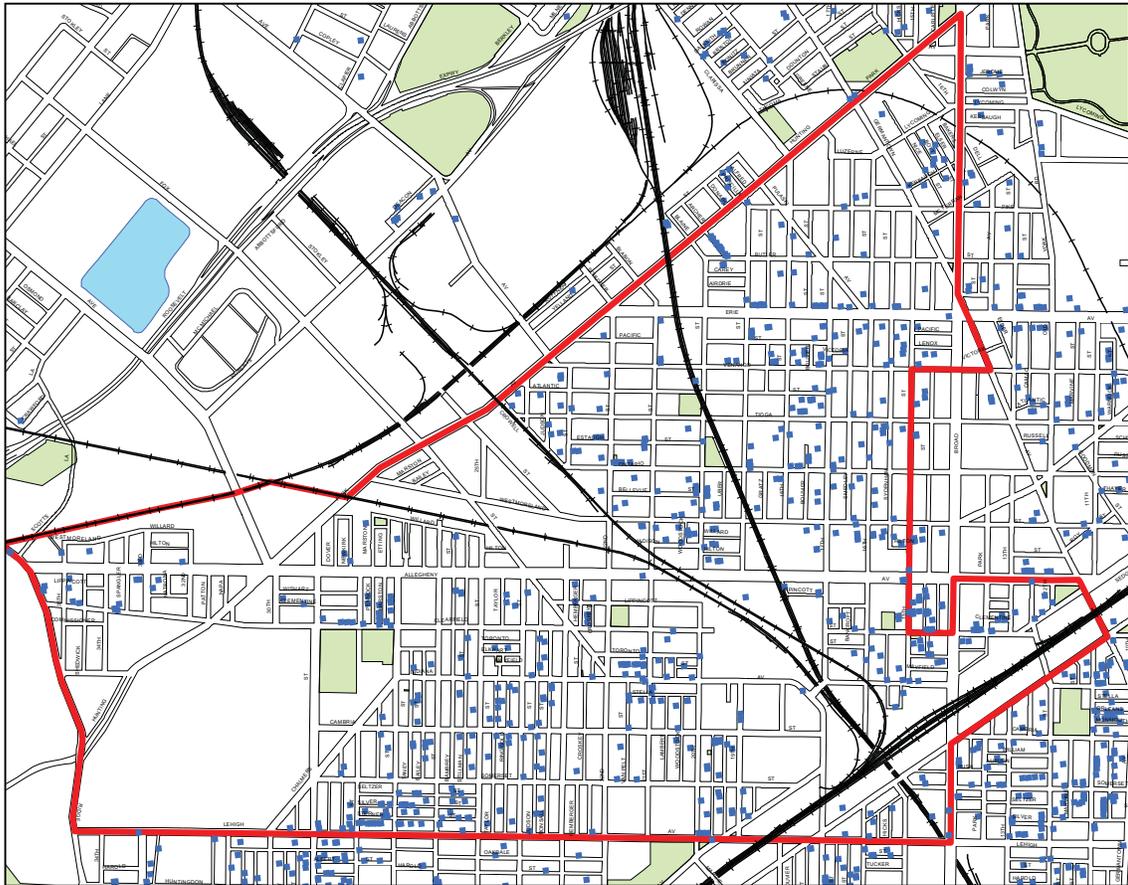
Key evidence includes the following:

- the presence of 1,003 vacant structures and 588 dangerous buildings
- the existence of 590 vacant lots
- the presence of 4,228 properties with housing code violations



Blight Certification boundary

There are many vacant properties in Allegheny West and Tioga, providing clear evidence of blight. The most recent Licenses & Inspections vacancy survey indicates that there are 1,593 vacant buildings and lots in the area. This includes 1,003 vacant buildings and 590 vacant lots included in the 2001 survey by L & I. Even with this high degree of vacancy, the L & I vacancy is undercounted because the survey did not generate data for a 20-block area in western Tioga. Many properties have unsafe and unsanitary conditions, including 588 buildings officially designated as “dangerous” by L & I (2001). Most of the vacant lots are uncared for and strewn with trash, as observed by Planning Commission staff in the field; and this indicates the presence of unsafe, unsanitary and inadequate conditions in the area.



Dangerous Buildings in blue (source: Dept. of Licenses and Inspections, 2001)

Census information confirms that there is a large amount of vacancy in the study area. There are eight census tracts corresponding with Allegheny West and Tioga. Of the 17,767 total housing units, 2,973 units are vacant (2000 Census). Therefore, vacant housing accounts for almost 17% of the housing units in the area. This is significantly higher than the comparable city rate of 10.9%.

Code violations are indicative of unsafe and inadequate conditions. In the census tracts that most closely mirror the study area boundary, there are 4,228 properties in violation of the City Housing Code as determined by the Department of Licenses and Inspections in April 2002. Thus, code violations exist for 28% of the properties in those tracts, compared to only 20% for the City as a whole (data sources: University of Pennsylvania’s Neighborhood Information System, and L & I).

2. Faulty Street and Lot Layout

Faulty lot layout is evident in the study area. The residential lots on the 2500 to 2700 blocks of Sterner, Silver & Seltzer Streets and the 3100 blocks Chadwick and Bancroft Street are approximately 800 sq. ft. in size, which is far smaller than the minimum lot size in the City Code (1,440 sq. ft.).

Faulty street layout is demonstrated by the 2500 to 2700 blocks of Sterner, Silver & Seltzer Streets, which are 30 feet in width. These streets are too narrow in relation to the current City Code (Section 14-2104[5]) which contains the following standards:

- 64 ft. for a primary residential street
- 54 feet for a secondary residential street
- 50 feet for a tertiary street
- 36 ft. for a marginal access street

3. Inadequate Planning

Inadequate planning is evident in the study area because of the faulty street and lot layout described above.

4. Economically or Socially Undesirable Land Use

There is substantial evidence of economically and socially undesirable land use. This criterion is primarily met within the study area by virtue of the 2,973 vacant housing units (2000 Census) and 578 dangerous buildings. Tax delinquency and relatively low housing values provide additional evidence of economically undesirable use.

Vacant structures and lots are economically undesirable inasmuch as city-wide experience has demonstrated that vacant properties have an increased likelihood of being long-term tax-delinquent. Residential property abandonment deprives the neighborhood, the city and the region of purchasing power, which erodes the local economy and results in reduced sales tax revenue to government.



20<sup>th</sup> & Ontario Streets

19<sup>th</sup> & Tioga Streets



Vacant structures and lots and dangerous buildings are socially undesirable for a number of reasons: they downgrade the overall physical environment of the neighborhood, they reduce the area's vitality, and they increase the potential for vandalism, arson, and other crime. The increased threat of arson is a hazard which affects both vacant buildings and adjoining, occupied structures in the neighborhood. Furthermore, the vacant building in this area may be structurally deteriorated and therefore they pose a danger to children, passersby and people who might be trespassing on the property.

Tax delinquency represents economically undesirable land use. When real estate tax is not paid, privately-owned properties are benefiting from municipal services without contributing to the revenue base that pays for those services. Within the blight certification area, approximately 1,009 properties are long term tax-delinquent. These tax delinquent properties appear in the L& I database as being included in a 1996 lien sale; and the lien sale data is reported by the University of Pennsylvania's Neighborhood Information System. Again, this indicator gives a picture of tax delinquency that is understated, in the opinion of Planning Commission staff. Staff experience with tax delinquency trends strongly suggests that actual tax delinquency is far greater than 1,009 properties; but regardless, the significant level of tax delinquency shows that the area currently provides a low economic return to the City.

Census Property Values show a median value of \$29,649 compared to the City's median value of \$59,700 (2000 Census). Therefore, property values in this area are approximately half of the City median. Low property values represent economically undesirable land use because of decreased tax revenues to the City, and diminished potential to attract new development and private investment.

## CONCLUSION

In the overall area generally bounded by Broad Street and Germantown, Glenwood, Lehigh, Ridge and Hunting Park Avenues, existing conditions are consistent with four (4) of the criteria necessary to produce a finding of blight under Pennsylvania Redevelopment law. Those criteria are:

1. Unsafe, unsanitary, inadequate or overcrowded conditions
2. Faulty street and lot layout
3. Inadequate Planning
4. Economically or socially undesirable land use

The preceding analysis has demonstrated that these four (4) criteria for establishing the presence of blight are satisfied and the area is eligible for certification.

RESOLUTION

WHEREAS, Pennsylvania Urban Redevelopment Law, Act of May 24, 1945 (P.L. 991) as amended, authorizes the Philadelphia City Planning Commission to certify as blighted specific areas which may then, in whole or in part, be made the subject of redevelopment proposals formulated by the Redevelopment Authority in accordance with said Act, and

WHEREAS, on June 16, 1970, the Philadelphia City Planning Commission certified the area generally bounded by Germantown Avenue and Broad Street on the east, Hunting Park Avenue on the north, the Chestnut Hill branch rail right-of-way and 23rd Street on the west and Lehigh Avenue on the south as exhibiting characteristics of blight under terms of said Act, and

WHEREAS, this expanded Blight Certification Area being certified today, March 18, 2003 expands the aforementioned certification area to include an area generally bounded by Broad Street and Germantown, Glenwood, Lehigh, Ridge and Hunting Park Avenues, and

WHEREAS, after substantial review and study, the Commission staff has presented a report concluding that the expanded area generally bounded by Broad Street and Germantown, Glenwood, Lehigh, Ridge and Hunting Park Avenues exhibits characteristics of blight as defined by the Act, and

WHEREAS, the Planning Commission concurs with the findings and conclusions set forth in said staff report,

NOW THEREFORE on this eighteenth day of March 2003, the Philadelphia City Planning Commission hereby finds, based upon its staff report dated March 2003 that the area generally bounded by Broad Street and Germantown, Glenwood, Lehigh, Ridge and Hunting Park Avenues exhibits the following characteristics of blight as established by Pennsylvania Urban Redevelopment Law:

1. Unsafe, unsanitary, inadequate or overcrowded conditions
2. Faulty street and lot layout
3. Inadequate Planning
4. Economically or socially undesirable land use

and hereby certifies the above described area as blighted under the terms and provisions of the said Act.

