

LEHIGH COUNTY

FIVE YEAR CONSOLIDATED PLAN 2007-2011

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5 Year Strategic Plan

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

GENERAL

Executive Summary

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

5 Year Strategic Plan Executive Summary:

Part I What is the 5 Year Strategic Plan?

Lehigh County, Pennsylvania has prepared a Five Year Strategic Plan in order to strategically implement federal programs that fund housing and community and economic development activities within the municipality. Through a collaborative planning process, involving a broad range of public and private agencies, the County has developed a single, consolidated planning and application document for the use of federal entitlement funds available through the Community Development Block Grant (CDBG) Program and the HOME Investment Partnerships Program. Lehigh County will submit this 5 Year Strategic Plan to the U.S. Department of Housing and Urban Development (HUD).

The Five Year CP for Lehigh County will serve the following functions.

- A planning document that enables the County to view its HUD funding, not in isolation, but as one tool in a comprehensive strategy to address housing, community development, and economic development needs.
- An application for CDBG Program funds and eventually HOME funds under HUD's formula grant.
- A strategy document to be followed in carrying out HUD programs.
- An action plan that provides a basis for assessing performance in carrying out use of CDBG Program funds and HOME Program funds.

Community Development Block Grant (CDBG) funds to address the needs outlined in the Strategic Plan are anticipated to be approximately \$1.4 million for each of the next five years. The three overarching objectives guiding the proposed activities are:

- Providing Decent Affordable Housing
- Creating Suitable Living Environments
- Creating Economic Opportunities

Outcomes show how programs and activities benefit a community or the people served. The

three outcomes that will illustrate the benefits of each activity funded by the CDBG program are:

- Improve Availability/Accessibility
- Improve Affordability
- Improve Sustainability

All future activities funded in the next five years will support at least one objective and one outcome.

The County's framework for realizing the objective and outcomes include the following goals:

- provision of decent, affordable housing
- provision of a suitable living environment
- expansion of economic opportunities
- increase homeownership
- end chronic homelessness

The following are the needs for housing, community development, homeless and special needs, and public and assisted housing:

Housing Needs

Retain existing housing stock — rehabilitation assistance is needed for both owner and renter occupied housing.

Development of additional affordable housing — housing to be developed by private investment and non-profit organizations

Development of rental housing — utilize CHDO's and nonprofit organizations to provide financial and technical assistance in developing housing facilities for the very low income and low income renters.

Homebuyer's assistance — down payment and closing cost assistance for low and moderate-income homebuyers.

Community Development Needs

Public services — wide range of public services, especially for the homeless and to prevent homelessness and expand housing choice for special needs populations.

Public facilities/infrastructure improvements — leverage local funding for facilities for youth, downtown business districts, sidewalk, street, water, sewer and drainage improvements.

Homeless and Special Needs

Increase housing facilities and services — private, non-profit developers, especially CHDOs, will leverage other public and private funding to develop transitional housing and supportive housing services.

Public and Assisted Housing Needs

Rental subsidies through Section 8

Modernization of existing units.

Additional resident services to encourage independent living

Part II The Planning Process

The development of the 2007 – 2011 Strategic Plan is built upon a number of other studies, plans and reports that been prepared over the past year, including:

- An Affordable Housing Assessment of the Lehigh Valley
- Affordable Housing Policy Recommendation of the Bi-County Affordable Housing Policy Advisory Committee
- Allentown's Plan to End Chronic Homelessness by 2012 by the First Lady's Commission to End Chronic Homelessness
- NE Regional Housing Advisory Board Continuum of Care application

Additionally, the County engaged a consulting firm, Mullin and Lonergan Associates, Inc. to assist in the preparation of the plan. The consultants have interviewed representatives of a wide range of organizations. Input was sought from local municipalities and two public hearings were held. The local municipalities were notified of the public hearings and an announcement was made in the *Morning Call*.

Strategic Plan

HUD provides specific questions or issues to address in each section. In this section, the explanation is about the process for the Strategic Plan: Due every three, four, or five years (length of period is at the grantee's discretion) no less than 45 days prior to the start of the grantee's program year start date. HUD does not accept plans between August 15 and November 15.

Mission:

Lehigh County will utilize CDBG funds and other federal funds provided by the U.S. Department of HUD to address urban revitalization, affordable and suitable housing, infrastructure improvements and public services, in ways that facilitate improvement within its communities.

General Questions

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

5 Year Strategic Plan General Questions response:

1. Description of the geographic areas of Lehigh County:

Lehigh County is located in southeastern Pennsylvania in the area known as the Lehigh Valley, with the City of Allentown as its County seat. Lehigh County neighbors the East Coast's major markets. Positioned in the corridor between Philadelphia and New York City, with quick and easy access to both of these major metropolitan areas, the area is accessible via I-78, Rt.22, Rt.309, Rt.33 or Rt.476 (Pennsylvania Turnpike). One-third of the U.S. population lives within a comfortable one day's drive, and one-half of Canadian businesses are within 500 miles. Lehigh County also has a thriving cultural scene, with stage theaters, art museum, amusement park with world-class coasters and water slides, premier bicycle racing track, game preserve, numerous historical sites, and lots of arts and music festivals.

History

Settlement began in the Lehigh Valley about 1737, shortly after the famous Walking Purchase. The area was largely settled by two groups of Germans; the highly communal religious sects like the Moravians and Mennonites, and the more relaxed German Reformed and Lutheran churches. While the Moravians built closed communities, the Reformed and Lutherans actually shared their church facilities establishing the rather unique "Union" churches.

For both groups the attraction to the valley was, however, the same. The Lehigh Valley looked very much like the Palatinate, the region of Germany from where many of these Germans immigrated.

What looked rather NOT like home were the resident Lenni Lenape Indians. The Walking Purchase, which had opened up the area to settlement, might have been better called the "Running Purchase". It was a thinly disguised land grab by the English, which the Lenni Lenape never forgave. This event was soon followed, starting in 1755, by the French and Indian War; a struggle between the French and English that was further complicated by the Iroquois Indians, who claimed dominate over the Lenni Lenape, and by a violent boundary dispute between Pennsylvania and Connecticut, called the Pennamite War. The Lenape met violence with violence. There were a number of Indian raids, the victims being men, women and children of the recent settlers. By the late 1760's, the English ended up on top, the Lenni Lenape west of the Alleghenies and the Germans distrustful of "ouslanders".

The English dominance was short lived. Having defeated the French, they now wanted the colonists to foot the bill for their defense. The colonists felt they had defended themselves quite well, thank you very much, and need not be taxed for it. This dispute ended in the American Revolution. As for the Lehigh Valley the most memorable event was our sheltering of the Liberty Bell in the Zion Reformed Church in Allentown while the British controlled Philadelphia.

The late 18th century and early 19th century were to see the rise of the agricultural village. In almost all cases the origin of the village was a tavern, around which dwellings and other businesses slowly collected. Almost synonymous with the tavern was the store, often owned by the same person. The surrounding farm land could support a fairly fixed number of people and any extra population was absorbed, rather dramatically, by Allentown and the boroughs, which were growing by leaps and bounds. Their growth can be laid to industrialization and their location next to the river, the canal, and, later, the railroads.

The dawn of the 1830's held great hopes for the valley. The Lehigh Canal had been completed in 1829 and coal and timber was floating down toward Philadelphia. There was money to be made and many entrepreneurs willing to speculate. The speculation came to a grinding halt with the Panic of 1837, which went on for five years topped off by the flood of 1841, which took away most of the houses and businesses located along the canal. The high ground was finished off by the fire of 1848 started by two disgruntled workers who started a barn on fire. The fire consumed the entire center of Allentown.

But the human spirit and the profit motive were not to be denied. By 1855, the town had been rebuilt, in brick this time, and the Lehigh Valley Railroad was completed. Soon there were blast furnaces, rolling mills, cement mills and powder mills. Cement, iron, Zinc and slate quarries dotted the landscape. Manufacturing was powered by the improved steam engine.

The Civil War was a real spur to the northern economy. The production of war material created new industries that just kept on going after the war was over.

The valley was to retain much of its Pennsylvania German/Agricultural nature well into the twentieth century, except for the corridor along the banks of the Lehigh River. That was almost a different world by the 1880s. The first boroughs were all along the river, populated in increasing numbers by new immigrant families. After the Panic of 1873, there was an increase in the diversity of industry that included silk and furniture manufacturing. The early iron industry had attracted English, Welsh, Irish and Scottish workers. The workers in these new industries

include Polish, Russian, Ukrainian, Slovak, Italian, Greek and Syrian. The First and Sixth Wards of Allentown were their communities, each with their own churches and their own social clubs. South Bethlehem, the area around Bethlehem Steel, was of a same nature.

Today Lehigh County is comprised of 347 square miles of rolling hills including over 11,000 acres of preserved farmland and a network of more than 17,000 acres of outdoor recreational parks that offer extensive leisure opportunities.

General Demographic Characteristics

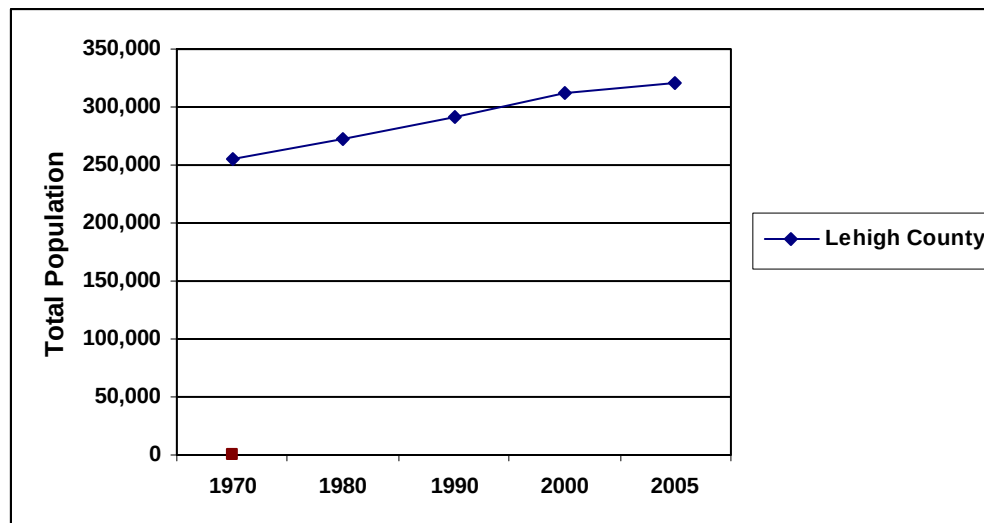
In this section of the Five Year Strategic Plan, demographic and socio-economic characteristics of Lehigh County are described to identify trends, existing conditions and estimated projections. The statistical information in this section, unless noted, was derived primarily from census reports published by the U. S. Census Bureau and data from the Lehigh Valley Planning Commission.

Lehigh County will use the findings and conclusions of this analysis to identify priorities and formulate strategies for the use of its federal entitlement funds consisting of Community Development Block Grant (CDBG) program funds, HOME Investment Partnerships (HOME) program funds, and Emergency Shelter Grant (ESG) program funds.

Population

Overall, the population of Lehigh County increased between 1970 and 2005.

Table 1
Total Population

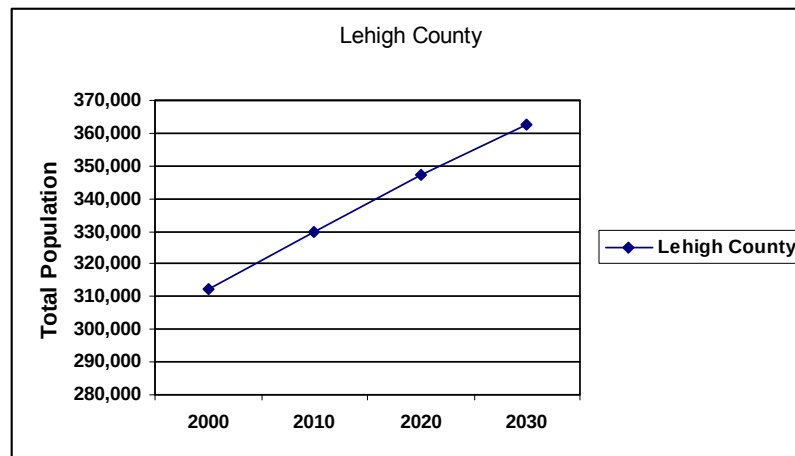


Source: U.S. Census Bureau

Population projections prepared by the Lehigh Valley Planning Commission (LVPC) in 2000 illustrate the anticipated continuing growth over the next twenty-five years.

For Lehigh County, the 2010 projection has already been surpassed based on population estimates released by the U.S. Census Bureau for July 1, 2005. LVPC projected the 2010 population of Lehigh County would be 329,552 while the Bureau's 2005 estimate was 330,433.

Table 2
Population Projections



Source: Lehigh Valley Planning Commission

Areas of Concentrations of Racial and Ethnic Minorities

The 2000 Census reported that white residents accounted for 95% of the County's population, black residents accounted for 1.3% of the population, American Indian/Alaskan Natives less than 1% (0.1%), Asian/Pacific Islanders 1.8%, Other/Three or More Races 1.8%, and Persons of Hispanic Ethnicity (regardless of race) accounted for 2.3% of the population.

Across the County, the percentages of racial and ethnic minorities varied by census tract. Five census tracts had rates of racial minorities higher than the County rate of 5% and nine census tracts had rates of ethnic minorities greater than the County rate of 2.3%.

Table 3, Population by Race, shows the five census tracts where the rates of racial and ethnic minorities exceeded the rate for the County as a whole. Those areas are shaded in the following table.

Table 3
Population by Race, 2000

Census Tract	Total Population	White	%	Black/ African American	%	American Indian/ Alaska Native	%	Asian/ Pacific Islander	%	Other/ Two or more races	%	Hispanic/ Latino*	%
51	4,434	4,267	96.2%	63	1.4%	9	0.2%	18	0.4%	77	1.7%	90	2.0%
52	6,588	6,503	98.7%	14	0.2%	5	0.1%	27	0.4%	39	0.6%	64	1.0%
53	7,128	7,011	98.4%	18	0.3%	6	0.1%	19	0.3%	74	1.0%	72	1.0%
54	6,013	5,890	98.0%	28	0.5%	3	0.0%	24	0.4%	68	1.1%	71	1.2%
55.01	7,839	7,652	97.6%	42	0.5%	5	0.1%	44	0.6%	96	1.2%	105	1.3%
55.02	6,892	6,613	96.0%	81	1.2%	8	0.1%	64	0.9%	126	1.8%	139	2.0%
56.01	4,522	4,389	97.1%	51	1.1%	3	0.1%	39	0.9%	40	0.9%	75	1.7%
56.02	5,199	5,006	96.3%	70	1.3%	6	0.1%	52	1.0%	65	1.3%	130	2.5%
57.01	7,537	6,419	85.2%	233	3.1%	6	0.1%	620	8.2%	259	3.4%	366	4.9%
57.02	4,119	3,961	96.2%	55	1.3%	0	0.0%	40	1.0%	63	1.5%	105	2.5%
57.03	3,519	2,770	78.7%	273	7.8%	17	0.5%	167	4.7%	292	8.3%	413	11.7%
58	3,387	3,280	96.8%	53	1.6%	3	0.1%	11	0.3%	40	1.2%	77	2.3%
59.01	6,588	6,298	95.6%	78	1.2%	22	0.3%	40	0.6%	150	2.3%	233	3.5%
59.02	1,913	1,648	86.1%	106	5.5%	1	0.1%	90	4.7%	68	3.6%	117	6.1%
60.01	4,613	4,449	96.4%	58	1.3%	2	0.0%	52	1.1%	52	1.1%	65	1.4%
60.02	5,107	4,833	94.6%	47	0.9%	0	0.0%	169	3.3%	58	1.1%	74	1.4%
61.01	4,016	3,824	95.2%	43	1.1%	3	0.1%	90	2.2%	56	1.4%	93	2.3%
61.02	4,292	4,141	96.5%	36	0.8%	1	0.0%	62	1.4%	52	1.2%	40	0.9%
62.01	9,203	8,421	91.5%	118	1.3%	4	0.0%	503	5.5%	157	1.7%	175	1.9%
62.02	4,692	4,496	95.8%	46	1.0%	1	0.0%	85	1.8%	64	1.4%	60	1.3%
63.02	3,641	3,532	97.0%	12	0.3%	3	0.1%	47	1.3%	47	1.3%	33	0.9%
63.03	3,039	2,883	94.9%	41	1.3%	2	0.1%	65	2.1%	48	1.6%	41	1.3%
64	7,234	7,074	97.8%	17	0.2%	6	0.1%	80	1.1%	57	0.8%	76	1.1%
65	5,608	5,383	96.0%	44	0.8%	6	0.1%	51	0.9%	124	2.2%	113	2.0%
66	5,360	5,163	96.3%	29	0.5%	1	0.0%	124	2.3%	43	0.8%	52	1.0%
67.01	4,671	4,453	95.3%	98	2.1%	1	0.0%	45	1.0%	74	1.6%	132	2.8%
67.02	2,908	2,735	94.1%	68	2.3%	4	0.1%	23	0.8%	78	2.7%	89	3.1%
67.03	5,919	5,691	96.1%	38	0.6%	0	0.0%	137	2.3%	53	0.9%	68	1.1%
68	4,614	4,007	86.8%	176	3.8%	9	0.2%	42	0.9%	380	8.2%	495	10.7%
69.02	2,582	2,479	96.0%	18	0.7%	2	0.1%	45	1.7%	38	1.5%	46	1.8%
69.03	4,968	4,821	97.0%	41	0.8%	3	0.1%	51	1.0%	52	1.0%	68	1.4%
69.04	6,971	6,773	97.2%	42	0.6%	4	0.1%	85	1.2%	67	1.0%	60	0.9%
70	3,617	3,548	98.1%	6	0.2%	9	0.2%	20	0.6%	34	0.9%	25	0.7%
Total:	168,733	160,413	95.1%	2143	1.3%	155	0.1%	3,031	1.8%	2,991	1.8%	3,862	2.3%

Source: U.S. Census Bureau

One of the objectives of the strategic planning process is to determine if there are any areas of concentrations of racial minority or ethnic groups in the County. Areas of concentrations of racial or ethnic minorities are those census tracts where the rate of minority or ethnic persons is greater than the rate for the County as a whole. Therefore, any census tract in the County where the rate of minority households exceeds 5% and where the rate of Hispanic households exceeds 2.3% would be categorized as areas of concentrations of minority or ethnic residents. Concern over the situation of areas of concentrations of minority and ethnic residents generally arises when these same geographic areas are also noted to be areas of disproportionate need and contain a disproportionately higher rate of other characteristics such as low income persons, low homeownership rates, vacant and/or substandard housing units, and unemployed or underemployed persons, among other issues.

Areas of Concentrations of Low and Moderate Income Persons

The median income in 2000 for a family of four residing in Lehigh County was \$43,449. The median family income (MFI) is the income amount that falls in the middle of the population: 50% of all families had incomes higher than this amount and 50% had incomes lower than this amount.

According to HUD, family income levels can be categorized as extremely low (0-30% of MFI), very low (31-50% of MFI), low (51-80% of MFI), moderate (81-95% of MFI), middle (95-115% of MFI) and high (above 115% of MFI). In Lehigh County, these categories were associated with the following median family income (MFI) dollar ranges for a family of four persons:

- Extremely Low Income: Up to \$13,034
- Very Low Income: \$13,035 to \$21,724
- Low Income: \$21,725 to \$34,760
- Moderate Income: \$34,761 to \$41,277
- Middle Income: \$41,278 to \$49,966
- High Income: \$49,967 and higher.

For the purposes of the Strategic Plan and the associated HUD entitlement programs, emphasis is placed on those families earning 80% or less of the MFI. In Lehigh County, the overall percentage of low and moderate income (LMI) persons was 31.6% in 2000, while the First Quartile Low/Mod rate was 42.4%. A total of 12 census tract block groups across the County had a majority (i.e., more than 50.0%) of persons with incomes at or below 80% of the MFI. These census areas, identified as areas of concentrations of low and moderate income persons, are listed on Table 5, below.

A total of 32 census tract block groups across the County had a low/mod rate greater than the First Quartile Low/Mod rate of 42.4%.

Table 5
Areas of Concentrations of Low and Moderate Income Persons
by Census Tract Block Group, 2000

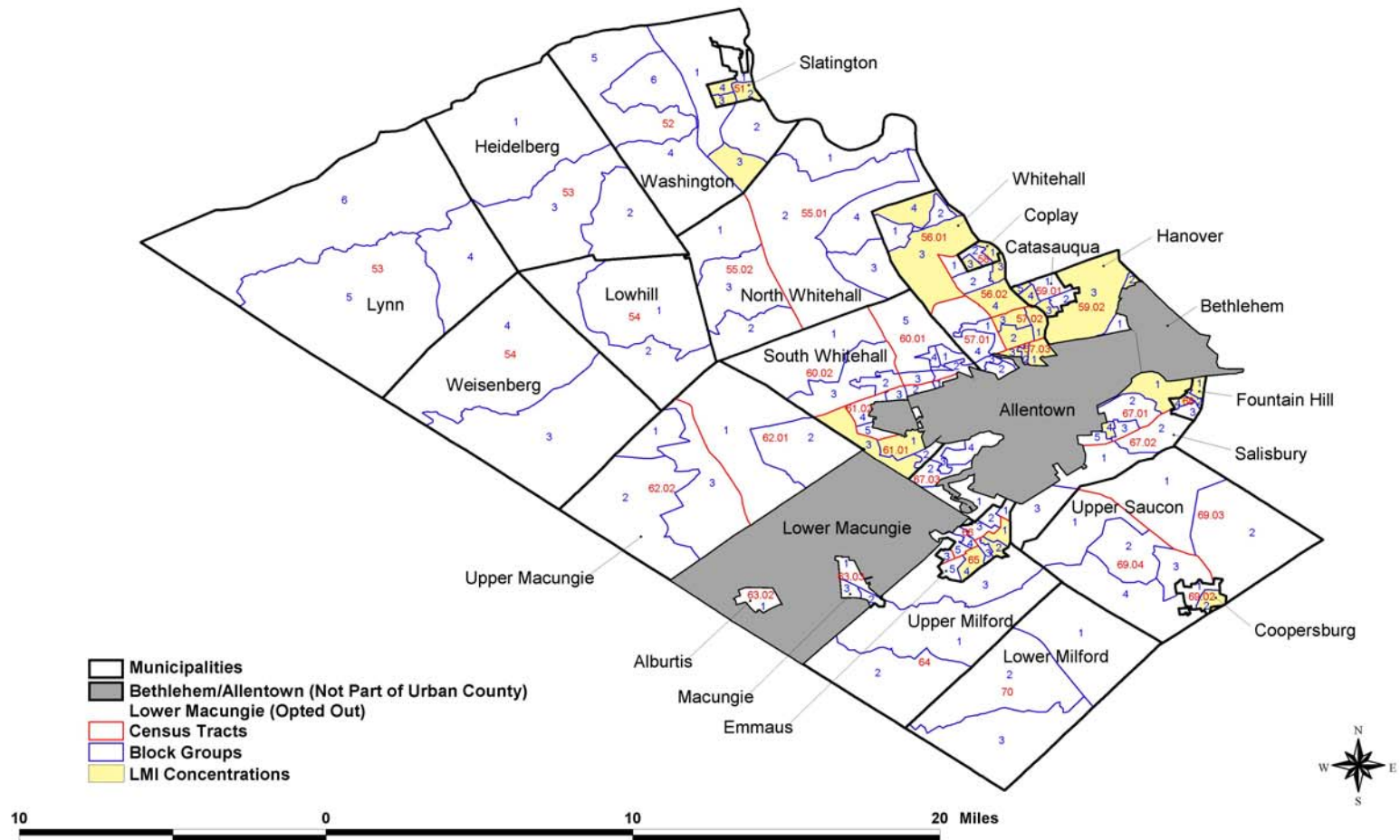
Municipality	CT	BG	Low/Mod Persons	Total Persons	% Low/Mod
Slatington	51	1	459	1229	37.3%
		2	946	1613	58.6%
		3	274	638	42.9%
		4	584	902	64.7%
		Total	2263	4382	51.6%
Washington Township	52	1	316	1086	29.1%
		2	327	1092	29.9%
		3	407	763	53.3%
		4	402	1732	23.2%
		5	264	641	41.2%
		6	488	1274	38.3%
		Total	2204	6588	33.5%
Heidelberg Township	53	1	368	986	37.3%
		2	253	1171	21.6%
		3	415	1278	32.5%
		Total	1036	3435	30.2%
Lynn Township		4	333	1005	33.1%
		5	306	1029	29.7%
		6	550	1639	33.6%
	Total	1189	3673	32.4%	
Lowhill Township	54	1	207	843	24.6%
		2	244	1026	23.8%
		Total	451	1869	24.1%
Weisenberg Township		3	485	2527	19.2%
		4	431	1591	27.1%
		Total	916	4118	22.2%
North Whitehall Township	55.01	1	547	1484	36.9%
		2	678	3449	19.7%
		3	252	1256	20.1%
		4	503	1650	30.5%
		Total	1980	7839	25.3%
	55.02	1	485	3157	15.4%
		2	513	1385	37.0%
		3	591	2025	29.2%
Total		1589	6567	24.2%	
Whitehall Township	56.01	1	398	1446	27.5%
		2	356	930	38.3%
		3	653	1471	44.4%
		4	323	673	48.0%
		Total	1730	4520	38.3%
	56.02	1	291	1045	27.8%
		2	613	1838	33.4%
		3	316	647	48.8%
		4	853	1661	51.4%
		Total	2073	5191	39.9%
	57.01	1	434	1402	31.0%
		2	405	1314	30.8%
		3	421	1545	27.2%
		4	801	3121	25.7%
		Total	2061	7382	27.9%
	57.02	1	670	1574	42.6%
		2	324	764	42.4%
		3	807	1671	48.3%
		Total	1801	4009	44.9%
	57.03	1	568	1105	51.4%
		2	689	1197	57.6%
		3	578	1195	48.4%
		Total	1835	3497	52.5%

Municipality	CT	BG	Low/Mod Persons	Total Persons	% Low/Mod
Coplay	58	1	727	1286	56.5%
		2	463	1268	36.5%
		3	356	801	44.4%
		Total	1546	3355	46.1%
Catasauqua	59.01	1	619	2042	30.3%
		2	549	1517	36.2%
		3	285	628	45.4%
		4	944	1556	60.7%
		5	418	789	53.0%
		Total	2815	6532	43.1%
Hanover Township	59.02	1	206	489	42.1%
		2	406	635	63.9%
		3	392	789	49.7%
		Total	1004	1913	52.5%
South Whitehall Township	60.01	1	301	908	33.1%
		2	476	1242	38.3%
		3	409	1052	38.9%
		4	274	832	32.9%
		5	167	579	28.8%
		Total	1627	4613	35.3%
	60.02	1	484	1476	32.8%
		2	293	2248	13.0%
		3	299	1375	21.7%
		Total	1076	5099	21.1%
	61.01	1	430	1014	42.4%
		2	131	582	22.5%
		3	596	1387	43.0%
		Total	1157	2983	38.8%
	61.02	1	274	680	40.3%
		2	200	679	29.5%
		3	160	890	18.0%
		4	98	772	12.7%
		5	298	1265	23.6%
		Total	1030	4286	24.0%
Upper Macungie Township	62.01	1	515	3265	15.8%
		2	1157	5677	20.4%
		Total	1672	8942	18.7%
	62.02	1	159	967	16.4%
		2	345	1018	33.9%
		3	973	2644	36.8%
		Total	1477	4629	31.9%
Alburtis	63.02	1	698	2,117	33.0%
		Total	698	2,117	33.0%
Macungie	63.03	1	307	1335	23.0%
		2	211	610	34.6%
		3	411	1094	37.6%
		Total	929	3039	30.6%
Upper Milford Township	64	1	578	2881	20.1%
		2	272	1547	17.6%
		3	524	1793	29.2%
		Total	1374	6221	22.1%

Municipality	CT	BG	Low/Mod Persons	Total Persons	% Low/Mod
Emmaus	64	3	131	303	43.2%
		1	480	978	49.1%
	65	2	830	1381	60.1%
		3	462	1195	38.7%
		4	564	1305	43.2%
		5	207	717	28.9%
		Total	2543	5576	45.6%
	66	1	234	733	31.9%
		2	229	806	28.4%
		3	391	1439	27.2%
		4	183	942	19.4%
		5	470	1433	32.8%
		Total	1507	5353	28.2%
Salisbury Township	67.01	1	356	792	44.9%
		2	282	904	31.2%
		3	451	1338	33.7%
		4	363	713	50.9%
		5	347	919	37.8%
		Total	1799	4666	38.6%
	67.02	1	385	1265	30.4%
		2	434	1034	42.0%
		3	84	451	18.6%
		Total	903	2750	32.8%
	67.03	1	513	2133	24.1%
		2	288	883	32.6%
		3	229	1292	17.7%
		4	168	1342	12.5%
		Total	1198	5650	21.2%
Fountain Hill	68	1	613	1232	49.8%
		2	448	1034	43.3%
		3	310	1126	27.5%
		4	466	960	48.5%
		Total	1837	4352	42.2%
Coopersburg	69.02	1	464	1512	30.7%
		2	490	903	54.3%
		Total	954	2415	39.5%
Upper Saucon Township	69.03	1	482	1769	27.2%
		2	578	2414	23.9%
		Total	1060	4183	25.3%
	69.04	1	300	1173	25.6%
		2	355	2051	17.3%
		3	152	1042	14.6%
		4	420	2607	16.1%
		Total	1227	6873	17.9%
Lower Milford Township	70	1	489	2179	22.4%
		2	197	693	28.4%
		3	139	745	18.7%
		Total	825	3617	22.8%
Lehigh County					31.6%

Source: U.S. Department of Housing and Urban Development, State of the Cities Data System

Lehigh County



Of particular interest are those census tracts where the percentage of LMI persons is greater than 42.4% and where there are identified areas of concentrations of racial and ethnic minority households. These census tracts of double concentrations are highlighted in the following table.

Table 6
Areas of Concentrations of Low and Moderate Income Persons
and Racial and Ethnic Minorities by Census Tract, 2000

Census Tracts	% low/mod	Black/ African American	Asian/ Pacific Islander	Other/ Two or more races	Hispanic/ Latino
51	51.6%	1.4%	0.4%	1.7%	2.0%
52	33.5%	0.2%	0.4%	0.6%	1.0%
53	31.3%	0.3%	0.3%	1.0%	1.0%
54	22.8%	0.5%	0.4%	1.1%	1.2%
55.01	25.3%	0.5%	0.6%	1.2%	1.3%
55.02	24.2%	1.2%	0.9%	1.8%	2.0%
56.01	38.3%	1.1%	0.9%	0.9%	1.7%
56.02	39.9%	1.3%	1.0%	1.3%	2.5%
57.01	27.9%	3.1%	8.2%	3.4%	4.9%
57.02	44.9%	1.3%	1.0%	1.5%	2.5%
57.03	52.5%	7.8%	4.7%	8.3%	11.7%
58	46.1%	1.6%	0.3%	1.2%	2.3%
59.01	43.1%	1.2%	0.6%	2.3%	3.5%
59.02	52.5%	5.5%	4.7%	3.6%	6.1%
60.01	35.3%	1.3%	1.1%	1.1%	1.4%
60.02	21.1%	0.9%	3.3%	1.1%	1.4%
61.01	38.3%	1.1%	2.2%	1.4%	2.3%
61.02	24.0%	0.8%	1.4%	1.2%	0.9%
62.01	18.7%	1.3%	5.5%	1.7%	1.9%
62.02	31.9%	1.0%	1.8%	1.4%	1.3%
63.02	33.0%	0.3%	1.3%	1.3%	0.9%
63.03	30.6%	1.3%	2.1%	1.6%	1.3%
64	22.3%	0.2%	1.1%	0.8%	1.1%
65	45.6%	0.8%	0.9%	2.2%	2.0%
66	28.2%	0.5%	2.3%	0.8%	1.0%
67.01	38.6%	2.1%	1.0%	1.6%	2.8%
67.02	32.8%	2.3%	0.8%	2.7%	3.1%
67.03	21.2%	0.6%	2.3%	0.9%	1.1%
68	42.2%	3.8%	0.9%	8.2%	10.7%
69.02	39.5%	0.7%	1.7%	1.5%	1.8%
69.03	25.3%	0.8%	1.0%	1.0%	1.4%
69.04	17.9%	0.6%	1.2%	1.0%	0.9%
70	22.8%	0.2%	0.6%	0.9%	0.7%
Total:	42.4%*	1.3%	1.8%	1.8%	2.3%

*First Quartile Low/Mod, Overall Low/Mod: 31.6%

Source: U.S. Census Bureau; U.S. Department of Housing and Urban Development, State of the Cities Data System

There are a total of two census tracts in Lehigh County that can be characterized as having these double concentrations. Census tracts 57.03 and 59.02 are areas in the County where the rate of low and moderate income persons exceeds 42.4% and where the rate of racial minorities is greater than the County's rate overall.

2. Description of the basis for allocating funds geographically in Lehigh County:

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

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

- Meeting the statutory requirements of the CDBG program;
- Meeting the needs of very-low, low- and moderate-income residents;
- Focus on low- and moderate-income areas or neighborhoods;
- Coordination and leveraging of resources;
- Response to expressed needs;
- Sustainability and/or long-term impact; and
- The ability to measure or demonstrate progress and success.

3. Identification of obstacles to meet underserved needs:

The primary obstacle to meeting underserved needs is the limited resources available to address the identified priorities. Lehigh County will partner with other agencies when feasible to leverage resources and maximize outcomes in housing and community development.

The County is a large geographic unit. The ability to reach out to communities over the large geographic area is limited. Through partnerships with local municipalities and non-profit human service agencies, the County programs can affect the communities where lower income people live.

Managing the Process (91.200 (b))

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

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

5 Year Strategic Plan Managing the Process response:

1. Lead Agency.

Lehigh County Department of Community and Economic Development is the lead agency for the preparation of the Five Year Strategic Plan and administration of the grants programs.

The DCED will work with local municipalities and other funded agencies in the implementation of program activities. Based on an annual application cycle, local municipal projects, housing and economic development and public service projects will be funded. Funds will be provided to each entity administering the activities through subrecipient agreements.

2. Plan Process

Lehigh County engaged the services of a consultant, Mullin and Lonergan Associates, Inc., to assist with the preparation of the Five Year Strategic Plan and the 2007 the Annual Plan. Notification was sent to each municipality and a list of local development and public service providers informing each of the opportunity to apply for funds, to offer comment on the five year needs of the community and to attend a public hearing to discuss the needs of the County that could be met with federal funding. The public hearing was advertised in the local newspaper of general circulation, the *Morning Call*.

The needs within the community were identified through a series of interviews as well as on the results of the work of the Affordable Housing Policy Advisory Committee and the Bi-County housing needs assessment.

The consultants were part of a Bi-County Affordable Housing assessment that included Lehigh County and had worked closely with the Affordable Housing Policy Advisory Committee, a body of 12 representatives from the Lehigh Valley. There were 4 working sub-committees of the Affordable Housing Policy Advisory Committee covering the topics of Housing Finance, Land Use, Owner Occupied Housing and Rental Housing. In all, nearly 30 people were involved in the process.

During the preparation of the Affordable Housing Assessment, the following agencies participated:

- Alliance for Building Communities
- Community Action Committee of Lehigh Valley (CACLV)
- Catholic Charities
- Lehigh Valley Center for Independent Living
- Habitat for Humanity
- Housing Association and Development Corporation
- Keystone Nazareth Bank and Trust
- Lafayette Ambassador Bank
- Lehigh County Conference of Churches
- Lehigh County Housing Authority
- Lehigh County MH/MR
- Lehigh Valley Development Corporation
- Lehigh County Housing Authority
- Neighborhood Housing Services of the Lehigh Valley
- Northeast Regional Housing Advisory Committee (Continuum of Care)
- Turning Point
- United Way of Greater Lehigh Valley

Input from the community, the affordable housing committees, County staff and other parties was used to draft the Strategic Plan. During a 30 day review period, the Strategic Plan and Annual Plan were reviewed by the County Executive and the Board of Commissioners. Before submission to HUD and after the incorporation of any comments received, the County Executive will authorize adoption of the Plan.

3. Consultation

During the development of the Strategic Plan, the following groups were interviewed. These groups represent the special populations whose needs were considered in this Strategic Plan.

Children

Lehigh County Children and Youth Agency

Elderly persons

Area Agency on Aging

Persons with disabilities

County Mental Health and Mental Retardation (MH/MR)
Center for Independent Living - Physical disabilities
VIA – Persons with developmental disabilities
Advocacy groups – National Alliance on Mental Illness (NAMI)

Persons with HIV/AIDS and their families

AIDS Activity Office of the Lehigh Valley Hospital

Homeless Persons

Northeast Regional Housing Advisory Board
Community Action Committee of the Lehigh Valley

Victims of Domestic Violence

Turning Point

Citizen Participation (91.200 (b))

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

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

5 Year Strategic Plan Citizen Participation response:

1. Citizen Participation Process

Lehigh County is a new entitlement. Therefore, a Citizen Participation Plan (CPP) was prepared and placed on public display with the Strategic Plan. The CPP identifies the steps that Lehigh County must take each year in the preparation of the Strategic Plan as well as amendment or modifications to the Strategic Plan and the Comprehensive Annual Performance and Evaluation Report (CAPER).

The Citizen Participation Plan requires that each of the following steps take place for the preparation of the Strategic Plan. For 2007, each step was followed.

I. Provision of Adequate Information

At the time that Lehigh County initiates the preparation of the Annual Plan in a new program year, a package of information will be compiled by the Department of Community and Economic Development for reference by individual citizens or organizations. This package will include:

- a. The total amount of entitlement funds to be made available to Lehigh County.
- b. The range of activities that may be undertaken with Federal funds and the kinds of activities that were previously funded and are still eligible under Federal regulations.
- c. The types of activities ineligible under Federal regulations.
- d. The process to be followed in preparing and approving the application, including the tentative schedule of meetings and hearings.
- e. The *Citizen Participation Plan*.

Notification will be sent to each municipality and a list of local development and public service providers informing each of the opportunity to apply for funds, to offer comment

on the five year needs of the community and to attend a public hearing to discuss the needs of the County that could be met with federal funding.

II. Public Hearings:

Lehigh County will hold at least two public hearings per year to obtain citizens' views and to respond to proposals and questions. These hearings will be held at two different stages of the program planning process.

a. Initial Public Hearing

The first hearing will serve several purposes, such as providing a summary of program requirements, answering questions about the Annual Plan process, handled on a chronological basis, that is, from development of the application to final evaluation, and to obtain views and review proposals of citizens and organizations at the initial stage of preparation of the program.

The purpose of this initial hearing is to obtain the views of citizens and organizations regarding overall community development and housing needs, development of proposed activities, including the estimated amount that will benefit persons of low and moderate income, and to review program performance.

The intent of this meeting(s) will be to provide a mechanism of citizen participation at the County-wide, municipal and neighborhood level. Comments or recommendations on projects in specific localities will be encouraged.

This hearing will be conducted by the Department of Community and Economic Development, which is responsible for preparation of the application.

Notice of the hearing will appear in the non-legal section of a newspaper of general circulation within Lehigh County. The notice shall be published at least ten (10) days prior to the public hearing.

In the event significant numbers of non-English speaking residents can reasonably be expected to attend public hearings, translation assistance will be provided so that they may participate effectively in the hearing.

b. Second Public Hearing

A second hearing will be undertaken when the draft application for funding has been prepared.

Upon completion of the proposed Annual Plan (AP), Lehigh County shall publish the proposed AP or summary of the AP in sufficient time to permit citizens to comment prior to its approval and adoption by the County Executive. The notice will appear in the non-legal section of papers of general circulation at least thirty (30) calendar days prior to the adoption of the AP and will indicate the locations at which the AP will be made available for public review.

The second hearing will be conducted during the thirty (30) day review period of the proposed AP. The notice of this second hearing may be combined with the notice of availability of the draft AP. However, the notice must allow at least ten (10) days from the date of publication to the date of hearing.

This hearing will be conducted by the Department of Community and Economic Development.

Following the thirty (30) day review period, the County Executive will take formal action on the application and forward it to the appropriate funding agency.

III. Acceptance of Written Comments, Proposals, or Recommendations:

At the time that planning begins for each year, organizations within Lehigh County will have the opportunity to submit comments, proposals, or recommendations on the Community Development Block Grant Program. Any resident or property owner in Lehigh County or any organization representing Lehigh County residents or property owners may participate.

At all times all written statements received will receive a written response no later than fifteen (15) working days from the date of receipt, setting forth the action taken or to be taken with respect to the comment, proposal, or recommendation. However, written statements that are intended to suggest modifications to the application can only be considered if they are received by the end of the thirty (30) day review period on the draft AP.

IV. Availability of the Strategic Plan and the Annual Plan

After the Strategic Plan and the Annual Plan have been adopted, Lehigh County shall publish a notice in the newspapers of general circulation indicating its content and availability.

2. Summary of Citizen Comments

To be completed after 30 day comment period

3. Efforts to Broaden Participation

Lehigh County does not have a significantly large population of persons of color nor Latinos. The cities of Allentown and Bethlehem each have larger communities but each city is an independent HUD entitlement and therefore not part of this Strategic Plan. There was no special outreach to minorities and non-English speaking persons as a result. However, over time, as the County's Latino population continues to grow and as staff becomes more acquainted with areas where there are higher concentrations of persons of color and non-English speaking populations, more outreach will be directed in those areas and through representative organizations.

The effort to outreach to persons with disabilities on the other hand was made through the Center for Independent Living and other organizations that provide services to persons with disabilities. Such groups were notified of the hearings and that locations were handicap accessible. The County offered to make materials available in alternative formats and to have sign language interpreters available at the meetings to meet any requests. There were no requests made however.

4. Written Explanation of Comments Not Accepted

To be completed after 30 day comment period

Institutional Structure (91.215 (i))

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

5 Year Strategic Plan Institutional Structure responses:

1. Institutional Structure

As discussed under the heading “Managing the Process”, the Lehigh County Department of Community and Economic Development is the lead agency for the preparation of the Five Year Strategic Plan and administration of the grants programs. The DCED will work with local municipalities and other funded agencies in the implementation of program activities. Based on an annual application cycle, local municipal project housing and economic development and public service projects will be funded. Funds will be provided to each entity administering the activities through subrecipient agreements.

The County will continue to support the Continuum of Care process so that agencies may continue to provide services to the homeless and to support housing applications for funding made by organizations that provide housing for persons with special needs.

In support of economic development goals, the County will coordinate activities with the Lehigh Valley Economic Development Corporation (LVEDC) and the Community Action Committee of the Lehigh Valley (CACLV). The County will continue its support of the Lehigh Valley Chamber of Commerce downtown improvement initiatives.

2. Strengths and Gaps in the System

The County staff has experience with the CDBG program. As participants in the DCED Small Communities Program, the staff is equipped with an understanding of the CDBG program. Through the HUD Grant, the same requirements for program activities will be met including Environmental Review, IDIS funds management, procurement, and eligibility and fundability (meeting a national objective) of activities. While there is some change in the process and additional requirements to be met, the fundamental components of the program are understood.

The County staff also administers a variety of other economic development and housing activities. These efforts will blend very well with CDBG activities. The County has initiated planning efforts in several municipalities to lead an effort at downtown revitalization and economic growth. CDBG funds can augment and compliment these activities by bringing resources for housing and economic development into the process. Additional housing

resources through the Affordable Housing Trust Fund can be accessed to implement the goals of the strategic plan.

On a larger scale, the nature of the division created by program requirements between the Urban County and the entitlement communities within the County creates a structural gap. The cities of Allentown and Bethlehem are entitlements in their own right and administer their own programs. Coordination between the various programs is needed to ensure that the needs of lower income families throughout the community are being met.

3. Public Housing

The Lehigh County Housing Authority serves Lehigh County outside of the cities of Allentown and Bethlehem. The County Executive recommends board appointments to the County Commissioners who approve the appointments. The Housing Authority is solely responsible for hiring of its employees and utilizes the state civil service process. There has been no joint procurement or contracting between the County and Authority to date. The Authority operates 289 public housing units scattered throughout the County. They have developed good relationships with local jurisdictions in which public housing is located. The Housing Authority does not intend to demolish or construct any new public housing in the foreseeable future. The Authority will continue to maintain existing public housing units utilizing Capital Fund Grants provided by HUD.

Effective with the adoption of this plan by the County Executive, the Housing Authority will begin to seek certification of consistency with the Strategic Plan from the County instead of the state.

Monitoring (91.230)

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

5 Year Strategic Plan Monitoring response:

Performance monitoring is an important component in the long-term success of the County's community development program. The Department of Economic and Community Development will be responsible for developing standards and procedures for ensuring that the recipients of housing funds meet the purposes of the appropriate legislation and regulations, and that funds are disbursed in a timely fashion.

The Department of Economic and Community Development oversees the County's housing and community development programs, and will be responsible for all performance measurement activities. The Department will incorporate objective standards and methods into the process of awarding funds, allocating resources to programs and agencies, and obtaining progress and completion reports from those programs and agencies. The monitoring requirements and procedures under the Strategic Plan will build upon existing monitoring systems and experience in administering federal and state programs and funds.

The Department's standards and procedures for monitoring are designed to ensure that:

- 1) objectives of the National Affordable Housing Act are met,
- 2) program activities are progressing in compliance with the specifications and schedule for each program, and
- 3) recipients are in compliance with other applicable laws, implementing regulations, and with the requirements to affirmatively further fair housing and minimize displacement of low-income households.

The Department reviews all proposed activities for eligibility under statutory and regulatory requirements, and for meeting identified needs in this plan.

All subrecipients of CDBG funds will be subject to monitoring. Fiscal monitoring will include review and approval of budgets, compliance with executed grant agreements, review and approval of vouchers, review of fiscal reports on a monthly basis, and a review of audits on an annual basis.

Additional monitoring will occur through on-site monitoring visits. These visits will occur as necessary, but will be conducted at least once a year. There are monitoring responsibilities that go beyond the time of completion of various activities. For community development public facilities and housing projects, site visits will be conducted at least every other year to assure benefit to low-income residents.

All sub-recipients must identify the personnel working on the project, keep accurate records and filing systems to document program benefits and compliance, maintain an appropriate financial management system, submit to an audit, and submit a final report as a closeout procedure.

Annually, in the preparation of the Consolidated Annual Performance and Evaluation Report (CAPER) the County will review whether the specific objectives outlined in this Strategic Plan are being met. Further, this review will be an opportunity to assess if the strategic plan goals continue to address community priorities and if adequate resources are available to meet the objectives. Community input will be sought in this analysis.

Performance Measurement Plan

In accordance with HUD's Community Planning and Development Notice 03-09, the County must develop a Performance Measurement System designed to measure both the productivity and impact of the Community Development Block Grant Program. In accordance with the HUD Training Manual and Guidebook Community Planning and Development Outcome Performance Measurement Framework, Lehigh County has developed the following:

For each activity the County is required to indicate the Objective and Outcome as per the new guidelines, these being:

Objectives:

- Creating Suitable Living Environments
- Providing Decent Affordable Housing
- Creating Economic Opportunities

Outcomes

- Availability/ Accessibility
- Affordability
- Sustainability

The combination of these creates an Outcome Statement for each activity. The Outcome Statement is also indicated on the individual Project Activity forms under Proposed Outcome. Additionally, the County will indicate the Specific Outcome Indicators that are required to be reported to HUD for each activity.

Priority Needs Analysis and Strategies (91.215 (a))

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

5 Year Strategic Plan Priority Needs Analysis and Strategies response:

1. The priorities presented were developed by:

- a) Weighing the severity of the need among all groups and sub groups,
- b) Analyzing the current social, housing and economic conditions
- c) Analyzing the relative needs of low and moderate income families
- d) Assessing the resources likely to be available over the next five years

Housing and Community Development Priorities

1. Housing

- Preservation of the existing affordable housing stock
- Development of additional affordable housing, especially with non-profit organizations.
- Increase homeownership for lower income households through homebuyer assistance and new construction.
- The development of additional rental housing.
- Continued modernization of public housing units and development of resident services.

2. Homeless

- Increase permanent supportive and transitional housing and services for homeless and special needs populations.
- Improve coordination and communication among homeless and supportive service providers
- Work toward ending chronic homelessness

3. Non-Housing Community Development Priorities

- Provide financial support for public services that prevent homelessness and meet emergency housing needs; expand housing choice for persons with disabilities.
- Provide financial assistance and technical support for public facility and infrastructure improvements.
- Foster local economic development and downtown revitalization.

2. Identify any obstacles to meeting underserved needs.

The biggest obstacle to meeting the needs of the underserved will be a considerable lack of public and private resources to fully address the priorities identified in this Consolidated Plan.

Lead-based Paint (91.215 (g))

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

5 Year Strategic Plan Lead-based Paint response:

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

Lead poisoning is a major threat to young children. Due to their developing brains, children are particularly vulnerable. At high levels, lead poisoning can cause convulsions, coma or even death. More insidious however, are the detrimental effects of low levels of lead poisoning on children. As little as one-quarter the size of a grain of salt is enough exposure to cause learning disabilities in children under age 6. Hearing impairments and slowed growth may also occur.

Lead exposure may occur from the dust in the air. It is now known that eating paint chips is not the cause of lead poisoning in young children. When a surface painted with lead-based paint begins to deteriorate, lead dust is produced. Climbing a stair tread or the wind blowing through an open window will cause dust to circulate dangerously through a room.

Blood lead level testing is needed to determine if a child has been exposed to lead-based paint. Levels in excess of 10u/dl is considered harmful. Levels over 20u/dl are considered extremely harmful.

The Pennsylvania Lead Elimination Plan notes that children residing in homes built prior to 1978, whose families receive Medicaid, have a history of anemia and have less than 12 years of education are particularly at risk. In 2005, the Pennsylvania Department of Health records report that 78 children in Lehigh County had a elevated blood lead level. It is not known how many of these children lived in Allentown or Bethlehem.

Table 7
Estimate of Children Exposed to Lead Based Paint

# of Children Tested	Screening Rate (# tested / population)	Total # of Confirmed Cases	# of Addresses- Multiple Children w/ Confirmed EBLLs *	Census 2000 Data			Estimated Population of Children < 6, 2005
				Total Housing Units	Pre-1950 Housing Units	% of Children < 6 Under Poverty	
2,245	9.9%	78	18	128,910	46,673	16.0%	22,639

Source: Pennsylvania Department of Health, 2005

Most of the factors that contribute to the prevalence of lead-based paint poisoning in Lehigh County can be quantified. According to the Report on the National Lead-based Paint in Housing, there are no statistically significant differences in the prevalence of lead-based paint by type of housing, market value of the home, cost of housing, household income or geographic region. By allying estimated national percentages of housing with lead-based paint to the housing stock figures from the 2000 Census, we can estimate the number of homes with lead-based paint in Lehigh County.

Table 8
Estimated Units with Lead Based Paint

Construction Year	Housing Units	Housing with Lead-Based Paint	
		Units	Percent
Total	195,920	164,573	84 %
1960-1979	54,343	41,605	76 %
1940-1959	40,886	37,615	92 %
Pre-1940	51,284	45,130	88 %

Source: U.S. Census Bureau

Number of families receiving Medicaid (now part of Health Choices, the Managed Care Program, October 2006): 38,118
 (County-wide includes Allentown, Bethlehem and Lower Macungie Township.)

Number of Adults over age 25 with less than 12 years of school: 57,599 (17.5%)
 (Lehigh County entitlement area only. Does not include Allentown, Bethlehem or Lower Macungie Township.)

Based on these estimates, 124,340 homes have lead based paint that present a potential hazard. However, the number of these homes with children under age 6 is unknown. There are 16,738 children under age 6 in the Lehigh County entitlement area. As the numbers indicate, there is strong evidence of a lead-based paint threat to children.

CHAS Data 2000 contains information about units affordable to low income households. The information only identifies total units and units constructed before 1970. The information does not provide a further break down of units by decade built.

To further refine the CHAS Data 2000, year built information available from the 2000 Census is applied to the units identified as affordable to low income households. The following table provides estimates of the number of renter and owner housing units that are suspected of containing lead-based paint.

Using data provided by HUD, it is also possible to approximate the number of housing units that may contain lead based paint and that are occupied by LMI households. The significance of this data is that LMI owner households who are cost burdened may not have the resources to abate lead based paint in their homes. LMI renter households may not even be aware that their leased units contain lead based paint, or they may be hesitant to ask their landlord to abate the problem for fear of being evicted or having their rent increased.

According to Table 9 below, HUD estimated that 1,803 rental units in Lehigh County occupied by extremely low income households were built prior to 1970. This represents 57% of the housing stock affordable to households with incomes of less than 30% of the MFI. Another 4,079 units constructed prior to 1970 were identified as affordable to households with incomes between 30-50% of the MFI, which represented 76% of the stock affordable to households with incomes between 50-80%. A total of 5,384 units were identified as constructed prior to 1970 and occupied by households with incomes between 50-80% of the MFI. Altogether, 11,267 units were occupied by LMI households in 2000 and built prior to 1970. This was equivalent to 9% of the total 2000 housing stock.

For owner-occupied units, a total of 9,975 units were identified as occupied by and affordable to LMI households and built prior to 1970. This represented 7% of the entire housing inventory.

Table 9
Number of Units by Age and Affordability

Housing Units by Affordability	Renter Units by Number of Bedrooms				Owner Units by Number of Bedrooms			
	0-1	2	3+	Total	0-1	2	3+	Total
0-<30% of MFI								
Occupied Units	2,064	530	559	3,153	N/A	N/A	N/A	N/A
Built Prior to 1970	966	392	446	1,803	N/A	N/A	N/A	N/A
30-<50% of MFI								
Occupied Units	2,897	1,425	1,041	5,363	205	1,180	3,291	4,676
Built Prior to 1970	2,129	1,070	880	4,079	157	704	2,761	3,623
50-<80% of MFI								
Occupied Units	4,188	3,158	1,816	9,162	265	1,803	6,671	8,739
Built Prior to 1970	2,483	1,690	1,211	5,384	184	1,478	4,690	6,352
Total Units Built Prior to 1970	5,579	3,151	2,536	11,267	341	2,183	7,451	9,975

Source: U.S. Census Bureau; U. S. Dept. of HUD

2. Actions Being Taken to Reduce Lead-Based Paint

The lead based paint rules at 24 CFR Part 35, went into effect in 2002. Lehigh County intends to undertake a housing rehabilitation program. Lead hazard control will be included in the program design for the housing rehabilitation program.

The County will disseminate information to local governments on lead-based paint hazards so that local contractors and others seeking to do work on residential units will become more familiar with the risks. This information will be available through the County's web site. The County will support the efforts of organizations that are engaged in providing such health information to the community.

HOUSING

Housing Needs (91.205)

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

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

5 Year Strategic Plan Housing Needs response:

1. Estimated Housing Needs

Current Estimates and Five-year Projections

Information from HUD's CHAS Databook (based on the 2000 Census) has been used to prepare the following narrative. HUD has determined that certain criteria result in housing problems for various household types. These criteria include cost burden (paying more than 30% or more than 50% of gross household income for housing costs); occupying a substandard dwelling unit (lacking complete plumbing or kitchen facilities); or, being overcrowded (having more than one person per room). This data is the most current information available on which to base the County's housing needs assessment.

Table 10 on the following page categorizes households in need as follows:

- o Extremely low income (0% to <30% of the median family income)
- o Very low income (30% to <50% of the median family income)
- o Low income (50% to <80% of the median family income).

Table 10 also provides a summary of the number of households in each income category by tenure and household type and the percent of such households that had a housing problem in 2000. The needs of various households, by household type within each income category, are described. The extent to which the households within each group are cost burdened and extremely cost burdened, and/or living in substandard housing, is examined. Also, the extent to which such problems impact minority households is reviewed.

According to the 2000 Census, 312,090 County residents lived in 121,906 households. Of the 121,906 households, 83,849 (68.8%) were owner households, and the remaining 38,057 (31.2%) were renter households.

Table 10
Lower Income Households with Housing Problems by Income Group

Income Category by Housing Problem	RENTERS					OWNERS				
	Elderly	Small Families	Large Families	All Others	Total	Elderly	Small Families	Large Families	All Others	Total
Extremely Low Income (0-<30% of MFI)	3,024	2,415	750	2,209	8,398	2,292	749	294	613	3,948
% with Any Housing Problem	63.6	76.8	90.7	74	72.6	76.9	78.6	86.4	77.2	78
% Cost Burdened	62	73.9	81.3	73.3	70.1	76	78.1	83	77.2	77.1
% Extremely Cost Burdened	40.8	56.9	60	60.4	52.3	45.1	72.1	68	65.1	55
Very Low Income (30-<50% of MFI)	2,544	1,990	590	1,955	7,079	4,612	1,294	365	719	6,990
% with Any Housing Problem	51.8	76.1	79.7	74.7	67.3	39	74.5	79.5	71.5	51
% Cost Burdened	50.5	71.6	54.2	74.7	63.4	38.7	72.6	71.2	71.5	50
% Extremely Cost Burdened	19.5	17.3	5.9	22	18.4	11.6	39.3	21.9	43.7	20.6
Low Income (50-<80% of MFI)	1,724	2,829	650	3,085	8,288	5,655	4,395	1,344	1,740	13,134
% with Any Housing Problem	43.4	28.4	41.5	27.7	32.3	16.8	50.3	52.8	57.2	37
% Cost Burdened	42.3	21.2	14.6	25.9	26.8	16.8	50.3	43.5	57.2	36.1
% Extremely Cost Burdened	8.4	0.5	0	1.1	2.3	5.8	10.5	7.8	19.8	9.4
Middle Income (80% of MFI & above)	1,863	5,398	770	6,193	14,224	10,770	36,438	5,570	7,044	59,822
% with Any Housing Problem	14.1	5.2	24.7	3.2	6.6	7.1	8.6	12.9	16.5	9.7
% Cost Burdened	13.9	1.6	0	1.7	3.2	7.1	8.1	9	16.3	9
% Extremely Cost Burdened	4.6	0.1	0	0.1	0.7	1.1	0.7	0.4	2.6	0.9
Total	9,155	12,632	2,760	13,442	37,989	23,329	42,876	7,573	10,116	83,894

Source: State of the Cities Data System: HUD CHAS Table 1C

Based on the data and analysis included within this section of the Strategic Plan, the following conclusions relative to housing needs in Lehigh County for all household types, income groups and racial groups can be made:

- o Extremely low income households are the most vulnerable for becoming homeless, regardless of household type. In 2000, there were 8,398 renter households and 3,948 owner households in this income category. These 12,346 households represented 10% of all households in Lehigh County with incomes of less than \$13,034 for a family of four.
- o The most frequent housing problem experienced by all households with housing problems was cost burden. This was indicated by similar rates of “any” housing problems and cost burden in several income groups for most household types.
- o Very low income elderly Black renters reported a rate of housing problems at 88%, which is thirty-seven percentage points higher than the rate of housing problems experienced by all elderly renter households in the same category (51%).
- o Very low income elderly Hispanic renters reported a rate of housing problems at 84%, which is thirty-three percentage points higher than the rate of housing problems experienced by all elderly renter households in the same category (51%).
- o Low income Black family renters reported a rate of housing problems at 44%, which is fourteen percentage points higher than the rate of housing problems experienced by all elderly renter households in the same category (30%).

Among homeowners, more Black household types were disproportionately impacted. Very low income and low income categories of Black elderly homeowners experienced a disproportionately higher rate of housing need than elderly households as a whole. The rate of housing problems among very low income Black elderly owners was 71% compared to 39% for all elderly homeowners in the County. For low income, Black owners reported a rate of 50% compared to 16% Countywide.

Black family homeowners were also disproportionately affected by housing problems. One hundred percent (which represented 30 of 30) of the extremely low income Black families experienced housing problems, compared to 81% Countywide, and 91% of very low income Black homeowners reported housing problems compared to 75% Countywide.

One hundred percent (representing 10 of 10) Black “all other” types of households reported housing problems compared to 57% Countywide.

- o Very low income Hispanic elderly homeowners were disproportionately affected by housing problems. Eighty-three percent experienced housing problems, compared to 39% Countywide.
- o One hundred percent of very low income Hispanic “all other” types of households reported housing problems compared to 71% Countywide.
- o Homeless housing needs were reported by many of the affordable housing and supportive service agencies. The most often cited housing need was a resolution to the ineligibility of persons with criminal records who apply for public housing. Without the possibility of living in public housing, these individuals have no place but the streets and homeless shelters to turn to for housing.
- o Several agencies cited the need for more emergency shelter beds for men and families with male children.
- o Advocates for the disabled reported a need for decent and affordable rental units in a secure environment for their vulnerable clients. They also cited the desperate need for

these units to be located in desirable neighborhoods along public transportation routes so their clients could depend on daily transportation to work.

Categories of Persons Affected

Renter Households

Lower income renter households consisting of households with incomes of less than 80% of the MFI accounted for 63% of all renter households in the County. In other words, close to two in every three renter households had incomes of less than \$34,760 in 2000.

Small families consisting of 2-4 related members numbered 7,234 and were the second largest group of lower income renters (30%). Elderly households, consisting of 1 or 2 persons with either person being 62 years of age or older, numbered 7,292 and were the largest group of lower income renters (31%). Large families of 5 or more related members numbered 1,990 and were the smallest income group (8%). The remaining households, collectively referred to as “all other” households by HUD numbered 7,289 and represented 31% of all lower income renter households in the County in 2000.

The following narratives describe the housing problems experienced by each of these household types.

Extremely Low Income (0-<30% of MFI)

Extremely low income renters experienced the greatest degree of housing problems among all household types and among all income groups. Overall, 72% had housing problems, 70% experienced cost burden and 52% were extremely cost burdened. It is obvious that household incomes of less than \$13,034 for a family of four in 2000 was very inadequate to achieve and maintain safe, decent and affordable housing for this income group.

Elderly households were the largest group in this income category with 3,024 households representing 36% of all extremely low income renter households.

Small family households were the second largest household type within this income category (29%). Their level of housing problems was higher than elderly households. Seventy-six percent of small family households experienced housing problems with nearly the same percentage (73%) reporting cost burden. Fifty-six percent reported being extremely cost burdened.

The next largest household type was “all other” households which numbered 2,209 and comprised 26% of all extremely low income renter households. Seventy-four percent reported housing problems with nearly the same percentage (73%) reporting cost burden, and 60% reporting extreme cost burden. “All other” households had the largest percentage who were extremely cost burdened.

Large families comprised the smallest group of households in this income category (750) and represented only 9% of all extremely low income renter households. However, this household type experienced the highest rate of cost burden (81%).

Very Low Income (30-<50% of MFI)

Very low income renter households numbered 7,079 and represented 30% of all lower income renters. The income level for this group was \$13,035 to \$21,724. This slight increase in income (above 30% of the MFI) for a family of four in 2000 made some difference in the degree of housing problems experienced by households in this income category. Overall, 67% of households experienced housing problems (compared to 72% among extremely low income renters). Sixty-three percent experienced cost burden (compared to 70% of extremely low income renters) and only 18% were extremely cost burdened (compared to 52% of extremely low income renters). It is evident that increasing income decreases the rate of housing problems, most specifically the degree to which households are cost burdened.

Elderly households numbered 2,544 and were the largest group of households in this income category (36%) but they experienced the lowest rates of housing problems. Fifty-one percent had housing problems, with almost the same percentage experiencing cost burden. Nineteen percent were extremely cost burdened.

Small families numbered 1,990 and represented 28% of households in this income category. Their degree of housing problems was much higher than the elderly, but slightly less than large families. Seventy-six percent had housing problems with nearly the same percentage (71%) experiencing cost burden. Seventeen percent reported extreme cost burden.

All other household types numbered 1,955 and comprised 27% of all very low income renter households. Seventy-four percent had housing problems, with the same percentage (74%) experiencing cost burden. Twenty-two percent were extremely cost burdened.

Large families numbered only 590 and represented the smallest group within this household type (8%). However, as with extremely low income renters, very low income large family households experienced rates of housing problems higher than any other household type in this income category and higher than this income group overall. The rate of cost burden was lower at 54%, and the rate of extreme cost burden was the lowest among this group of households at only 5%.

Low Income (50-<80% of MFI)

Low income renter households numbered 8,288 and accounted for 35% of all lower income renter households in Lehigh County in 2000. Housing problems were significantly lower for this income category as household income rose to the range of \$21,725 to \$34,760. This increase in income resulted in better living conditions for a majority of the households. Overall, 32% reported housing problems, 26% reported cost burden and 1% reported extreme cost burden.

All other household types were the largest group with 3,085 households, representing 37% of this income category. These households also experienced the lowest rate of housing problems among all low income renter households. Only 27% reported housing problems with nearly the same percentage (25%) being cost burdened. Only 1% was extremely cost burdened.

Small families were the second largest group with 2,829 households, comprising 34% of this income category. Twenty-eight percent reported housing problems, 21% reported being cost burdened and 0.5% of households reported extreme cost burden.

Elderly households numbered 1,724 and accounted for 21% of this income category, but they experienced the highest rate of housing problems for low income households. Forty-

three percent reported housing problems, 42% reported cost burden and 8% reported extreme cost burden.

Large families were once again the smallest group, numbering 650 and accounting for only 8% of all low income renter households. Housing problems for large families in this income category were high. Forty-one percent reported housing problems and 14% reported cost burden. No large families were extremely cost burdened.

Middle Income and Higher (80% of MFI and higher)

Middle income renter households numbered 14,224 and accounted for 60% of all renter households in Lehigh County in 2000. Housing problems were the lowest for this income category as household income rose to the range of \$34,761 and higher. This increase in income resulted in better living conditions for the vast majority of the households. Overall, only 6% reported housing problems while 3% reported being cost burdened.

All other household types were the largest group with 6,193 households, representing 43% of this income category. Only 3% reported housing problems and only 2% reported cost burden. Only 0.1% was extremely cost burdened.

Small families were the second largest group with 5,398 households, comprising 38% of this income category. Only 5% reported housing problems with 2% reporting a cost burden.

Elderly households numbered 1,863 and accounted for 13% of this income category. Fourteen percent experienced housing problems, and 14% were cost burdened.

Large families were the smallest group, numbering only 770 and representing 5% of households in this income category. Housing problems for large families in this income category, however, were still significantly high with 24% reporting housing problems. No large families were cost burdened.

Owner Households

Lower income owner households consisting of households with incomes of less than 80% of the MFI accounted for 29% of all owner households in the County. This meant that nearly one in every three owner households had incomes of less than \$34,760 in 2000.

Elderly households numbered 12,559 and comprised the majority of lower income owners (52%). Small families numbered 6,438 and were the second largest group of lower income owners (27%). Large families numbered 2,003 and were the smallest group of low income owners (8%). The remaining “all other” households numbered 3,072 and represented 13% of all lower income owner households.

The following narratives describe the housing problems experienced by each of these household types.

Extremely Low Income (0-<30% of MFI)

Extremely low income owners numbered 3,948 and accounted for 16% of all lower income owner households. Overall, this group experienced higher rates of housing problems than renter households in the same income group. Seventy-eight percent had housing problems and almost the same percentage (77%) experienced cost burden. Fifty-five percent experienced extreme cost burden.

Elderly households comprised the majority (58%) in this income category. Seventy-six percent had housing problems and the same percentage reported cost burden. Forty-five percent reported extreme cost burden.

Small families numbered 749 and were the second-largest group (19%) and had the second highest rate of housing problems among all extremely low income homeowners. Seventy-eight percent had housing problems, with the same percentage reporting cost burden. Seventy-two percent reported extreme cost burden.

“All other” household types numbered 613 and represented 15% of this income category. Seventy-seven percent reported housing problems, and the same percentage reported cost burden. Sixty-five percent reported extreme cost burden.

Large families numbered only 294, comprising 7% of extremely low income owner households, but once again had the highest rate of housing problems among this income group. Eighty-six percent reported housing problems with 83% reporting cost burden. Sixty-eight percent reported extreme cost burden.

Very Low Income (30-<50% of MFI)

Very low income homeowners had incomes in the range of \$13,035 to \$21,724 and numbered 6,990. This represented 29% of all lower income homeowners. Overall, this income group experienced housing problems to a lesser degree than extremely low income owners, but were still impacted more than low income owner households. Over half reported housing problems (51%) and cost burden (30%). Twenty percent reported extreme cost burden.

Elderly households comprised the majority (66%) of this household type numbering 4,612. They also had the lowest rate of housing problems: 39% reported housing problems with almost the same percentage reporting cost burden, and 11% reported extreme cost burden.

Small families numbered 1,294 and comprised 18% of all very low income homeowners. Housing problems were high among this group: 74% reported housing problems, and 72% reported cost burden. Thirty-nine percent reported extreme cost burden.

“All other” household types numbered 719 and comprised 10% of this income category. Seventy-one percent (71%) reported housing problems and the same percentage reported cost burden. Forty-three percent reported extreme cost burden.

Large families were the smallest category (5%), and the 365 households reported rates of housing problems nearly identical to small families and “all other” households in the same income category. Seventy-nine percent had housing problems, 71% reported cost burden and 21% were extremely cost burdened.

Low Income (50-<80% of MFI)

Low income homeowners were the majority (54%) of all lower income owner households in Lehigh County in 2000. The 13,134 households also had the lowest rate of housing problems, with incomes ranging from \$21,725 to \$34,760. Overall, this group had the lowest rate of housing problems: 37% reported housing problems and 36% reported cost burden. Only 9% reported extreme cost burden.

Elderly households numbered 5,655 and comprised the majority (43%) of low income homeowners. They also had the lowest rate of housing problems in this income category: 16% reported housing problems and the same percentage reported cost burden, while 5% reported extreme cost burden.

Small families numbered 4,395 and represented 33% of this income category. Fifty percent reported housing problems, and the same percentage reported cost burden. Only 10% reported extreme cost burden.

“All other” household types numbered 1,740 and represented 13% of this income group. Fifty-seven percent reported housing problems, and the same percentage reported cost burden. However, 19% reported extreme cost burden.

Large families were the smallest group at 1,344 and represented 10% of this income category. Fifty-two percent reported housing problems, 43% reported cost burden and 7% reported extreme cost burden.

Middle Income (80% of MFI and higher)

Middle income homeowners numbered 59,822 households in 2000 and comprised the majority (71%) of all owner households in Lehigh County. These households also had the lowest rate of housing problems, with incomes in excess of \$34,760. Overall, this group of homeowners had the lowest rate of housing problems: only 9% reported housing problems, 9% reported cost burden and only 1% reported extreme cost burden.

Small family households numbered 36,438 and comprised the majority (61%) of this household type. They experienced a lower rate of housing problems: 8% reported housing problems and the same percentage reported cost burden, while fewer than 1% reported extreme cost burden.

Elderly households numbered 10,770 and represented 18% of this income category. Only 7% reported housing problems, and the same percentage reported cost burden. Only 1% reported extreme cost burden.

All other household types numbered 7,044 and represented 12% of this income category. They also experienced the highest rates of housing problems among all homeowners in this income category: 16% reported housing problems, 16% reported cost burden and 3% reported extreme cost burden.

Large family households numbered 5,570 and represented 9% of this income group. Their rates of housing problems were higher than small families and elderly households in the same income category: 12% reported housing problems, 9% reported cost burden, and less than 1% reported extreme cost burden.

2. Finding of Disproportionate Need by Racial Group

To determine the extent to which any racial group has a greater housing need in comparison to overall County need, data detailing information for black non-Hispanic, white non-Hispanic, and Hispanic households is presented below.

A racial group is defined as having a disproportionate need when the percentage of housing need for that group is at least 10 percentage points higher than the percentage of housing need for Lehigh County as a whole.

In the tables below, black non-Hispanic renters are compared with white non-Hispanic and Hispanic renters, and black non-Hispanic owners are compared with white non-Hispanic and Hispanic owners. To simplify the text, black non-Hispanic households are referred to simply as black households, and white non-Hispanic households are referred to as white households. Hispanic households are referred to as Hispanic.

The following table shows the racial groups with disproportionate need. Those with disproportionate need are shaded in.

Table 11
Lower Income Renter Households with Housing Problems

Income Category by Housing Problem	BLACK RENTERS				WHITE RENTERS				HISPANIC RENTERS			
	Elderly	All Families	All Others	Total	Elderly	All Families	All Others	Total	Elderly	All Families	All Others	Total
Extremely Low Income	55	260	165	480	2,605	1,205	1,460	5,270	305	1,520	450	2,275
% with Any Housing Problem	72.7	78.8	66.7	74	63.9	78.8	76.4	70.8	59	81.6	72.2	76.7
Very Low Income	34	220	140	394	2,420	1,360	1,495	5,275	65	895	275	1,235
% with Any Housing Problem	88.2	84.1	75	81.2	50.2	80.5	73.2	64.5	84.6	69.3	81.8	72.9
Low Income	15	280	125	420	1,705	1,960	2,550	6,215	4	1,150	325	1,479
% with Any Housing Problem	0	44.6	16	34.5	44.3	28.6	29.2	33.1	0	31.3	21.5	29.1
Total	104	760	430	1,294	6,730	4,525	5,505	16,760	374	3,565	1,050	4,989

Source: HUD CHAS Table 1C

Table 12
Lower Income Owner Households with Housing Problems

Income Category by Housing Problem	BLACK OWNERS				WHITE OWNERS				HISPANIC OWNERS			
	Elderly	All Families	All Others	Total	Elderly	All Families	All Others	Total	Elderly	All Families	All Others	Total
Extremely Low Income	20	30	8	58	2,225	690	560	3,475	35	240	19	294
% with Any Housing Problem	50	100	50	75.9	77.5	79.7	79.5	78.3	57.1	83.3	78.9	79.9
Very Low Income	14	49	4	67	4,540	1,305	665	6,510	24	265	35	324
% with Any Housing Problem	71.4	91.8	0	82.1	38.8	73.6	70.7	49	83.3	81.1	100	83.3
Low Income	8	145	10	163	5,570	4,710	1,655	11,935	25	660	60	745
% with Any Housing Problem	50	44.8	100	48.5	16.8	50.8	56.5	35.7	0	50.8	50	49
Total	42	224	22	288	12,335	6,705	2,880	21,920	84	1,165	114	1,363

Source: HUD CHAS Table 1C

Renter Households

Lower income renter households numbered 23,765 in 2000 and accounted for 62% of all renter households (37,989). White households represented 70% of this group, Black households accounted for 5 %, and Hispanic households accounted for 21%. The remaining 4% is made up of Native American, Pacific Islander, and Asian households.

- 1) Extremely Low Income (0-<30% of MFI)
By household type, family households were impacted the greatest with Hispanic family households experiencing housing problems (81.6%), and 78.8% of Blacks and Whites experiencing housing problems. Elderly Hispanic households were the least impacted, with fewer experiencing problems (59%) than elderly Black households (72.7%).
- 2) Very Low Income (30-<50% of MFI)
Very low income elderly Black households experienced housing problems at a rate of 88.2%, compared to 84.6% for very low income Hispanic households.
- 3) Low Income (50-<80% of MFI)
There were only 420 low income Black renter households compared to 6,215 white renter households. Among Black and Hispanic households, there were no housing problems reported by elderly households. Black family households were the most impacted at 44.6%, followed by elderly White households at 44.3%.

Owner Households

Lower income owner households numbered 24,072 in 2000 and accounted for 29% of all owner households (83,894). White households represented 91% of this group, Black households accounted for 1%, and Hispanic households accounted for 6%. The remaining 2% is made up of Native American, Pacific Islander, and Asian households.

- 1) Extremely Low Income (0-<30% of MFI)
Seventy-nine percent of all extremely low income Hispanic homeowners experienced housing problems compared to 78.3% among Whites and 75.9% for Blacks. Like renters, family households were the most impacted at 100% among Blacks, 83.3% among Hispanics, and 79.7% among Whites.
- 2) Very Low Income (30-<50% of MFI)
Black family households experienced the highest level of housing problems at 91.8%, compared to 81.1% for Hispanic households and 73.6% for White households. Hispanic “all other” households experienced the highest level of housing problems of any of the categories.
- 3) Low Income (50-<80% of MFI)
Low income Hispanic homeowners had a higher overall rate of housing problems (49%) compared to 48.5% of Black homeowners (though relatively few at 103) and 35.7% for White households.

Summary of Disproportionate Housing Need

Based on the analysis of housing problems experienced by various household types by racial groups, among renters, the following are the racial groups experiencing disproportionate affordable housing needs:

- o Very low income elderly Black renters reported a rate of housing problems at 88%, which is thirty-seven percentage points higher than the rate of housing problems experienced by all elderly renter households in the same category (51%).

- o Very low income elderly Hispanic renters reported a rate of housing problems at 84%, which is thirty-three percentage points higher than the rate of housing problems experienced by all elderly renter households in the same category (51%).
- o Low income Black family renters reported a rate of housing problems at 44%, which is fourteen percentage points higher than the rate of housing problems experienced by all elderly renter households in the same category (30%).

Among homeowners, more Black household types were disproportionately impacted. Very low income and low income categories of Black elderly homeowners experienced a disproportionately higher rate of housing need than elderly households as a whole. The rate of housing problems among very low income Black elderly owners was 71% compared to 39% for all elderly homeowners in the County. For low income, Black owners reported a rate of 50% compared to 16% Countywide.

Black family homeowners were also disproportionately affected by housing problems. One hundred percent (which represented 30 of 30) of the extremely low income Black families experienced housing problems, compared to 81% Countywide, and 91% of very low income Black homeowners reported housing problems compared to 75% Countywide.

One hundred percent (representing 10 of 10) Black “all other” types of households reported housing problems compared to 57% Countywide.

- o Very low income Hispanic elderly homeowners were disproportionately affected by housing problems. Eighty-three percent experienced housing problems, compared to 39% Countywide.
- o One hundred percent of very low income Hispanic “all other” types of households reported housing problems compared to 71% Countywide.

(To determine the rate of housing problems experienced by all family households within the same income category, the rates of small families and large families were calculated as one household type.)

Populations with Special Needs Other than Homeless

Supportive housing is defined as residential units that provide a planned services component with access to a range of services identified as necessary for the residents to achieve personal goals. Various populations with special needs require supportive housing. The needs of these subpopulations are described below. Because it is not always possible to determine the number of persons who have supportive housing needs, the Strategic Plan uses standards recommended by national agencies to determine the estimated number of persons with supportive housing needs in Lehigh County.

Elderly and Frail Elderly

A frail elderly person is defined as one who has one or more limitations of activities of daily living (ADL), and one who may need assistance to perform ADL. Elderly persons may need housing assistance for two reasons – financial and supportive. Supportive housing is needed when an elderly person is both frail and low income, since the housing assistance offers services to compensate for the frailty in addition to financial assistance.

An estimate of the number of frail elderly requiring supportive services can be obtained by applying the national prevalence statistics for the proportion of elderly that require assistance with ADL to the number of elderly in Lehigh County who are low income.

The 2000 Census reported that there were 49,434 persons age 65 and over in the County, representing 15% of the total population. Among these individuals, the Census reported the following statistics:

- o 16,910 (34%) reported that they had a disability.
- o 3,289 (19%) of the 16,910 elderly with a disability reported that they had a self-care disability that limited their ability to dress, bath, or get around inside their home without assistance.
- o 8,580 (50%) of the 16,910 elderly with a disability reported that their disability limited their ability to go outside their home alone to shop or visit a doctor's office.
- o 3,414 (7.5%) of all elderly persons were living below the poverty level; 1,696 (10%) of the 16,910 elderly persons with a disability had income levels below poverty.

CHAS Data 2000 provides information on elderly households in the County with mobility and self-care disabilities. As defined by CHAS Data 2000, mobility and self-care limitations are a long-lasting condition that substantially limits one or more basic physical activities, such as walking, climbing stairs, reaching, lifting, or carrying; and/or a physical, mental or emotional condition lasting more than six months that creates difficulty with dressing, bathing, or getting around inside the home. CHAS Data 2000 provides the information by income category and reports on those with a housing problem. The data distinguishes by age, identifying elderly and extra elderly households. Elderly households are one or two member households where either person is 62 to 74 years. Extra elderly are one or two member households where either person is 75 years or older.

As shown in Table 13, CHAS Data 2000 reports the following information about elderly households with mobility and self care limitations in Lehigh County:

- o Of the 2,890 elderly and extra-elderly renter households with incomes below 80% of the MFI, 54% experienced housing problems in 2000.
- o Of the 3,359 elderly and extra-elderly owner households with incomes below 80% of the MFI, 39% experienced housing problems.

Table 13
Elderly Households with Mobility & Self-Care Limitations with Housing Problems

			With Any Housing Problem		
	62 to 74 Years	75 and Older	Total	Total	% of Households with a Limitation
Renter Households					
Low Income	915	1,975	2,890	1,565	54%
Above LMI	175	385	560	135	24%
Total Renters	1,090	2,360	3,450	1,700	49%
Owner Households					
Low Income	1,214	2,145	3,359	1,324	39%
Above LMI	1,190	1,189	2,379	178	7%
Total Owners	2,404	3,334	5,738	1,502	26%

Source: HUD State of the Cities Data Systems; CHAS Data 2000

The affordable and supportive service needs of the elderly include the following:

- o Home maintenance assistance, including minor home repairs is the most needed supportive housing service.
- o Affordable, safe and appropriate housing is needed.
- o Adaptive modifications that allow them to remain in their homes as their physical conditions change should be provided.
- o For people age 75 and over, the need for medical and other types of professional care rises sharply as evidenced by the large number of the elderly age 75 and over with self-care and go-outside the home disabilities.
- o As people live longer, there will likely be more people in need of care because of dementia or other illnesses that diminish their mental capacity. The 2000 Census reported that there were 3,470 persons age 65 and over with a mental disability in Lehigh County.
- o The need for personal care and assistance with daily living is increasing. As baby boomers age and families grow smaller, there will be an increasing number of older people who need support and assistance and fewer family members to fill the traditional role of providing care. Where there are no family members to provide direct care, public and nonprofit agencies will need to be increasingly creative in finding means to help the elderly remain in the community.

Persons with Disabilities

The majority of people with psychiatric or developmental disabilities experience housing problems or have housing needs in some form: cost burden; overcrowding; substandard housing; inability to move out of an institutional or residential treatment setting beyond the period of need; and, homelessness.

The CHAS Data for 2000 reported that among non-elderly households (that is, households where no member is 62 years of age or older) in Lehigh County, there were 4,000 renter households with mobility and self-care limitations. Together, these households comprised 52% of all County non-elderly households with mobility and self-care limitations and housing problems. Within this group, low income households outnumbered above low income households by more than three to one.

Among homeowners, the number of non-elderly households with mobility and self-care limitations was far greater than among renters. However, very low income homeowner households with limitations were less likely to have experienced housing problems than their renter counterparts. For households above 80% of the MFI, the percentage of households with limitations having housing problems were very similar (16% versus 12%).

Table 14
Non-Elderly Households with Mobility & Self-Care Limitations with Housing Problems

With Any Housing Problem		
	Total	% of Households with a Limitation
Renter Households		
Low Income	3,180	61%
Above LMI	820	16%
Total Renters	4,000	52%
Owner Households		
Low Income	2,320	56%
Above LMI	4,310	12%
Total Owners	6,630	27%

Source: HUD State of the Cities Data Systems; CHAS Data 2000

Issues related to housing for persons with disabilities include the following:

- o Affordable, safe and appropriate housing.
- o Creative home modification programs for those who acquire a disability as they age or through accident or illness.
- o Accessible housing, particularly for those with severe disabilities.
- o Assistance with one-time rental assistance and security deposits.
- o Varying levels of supportive services adaptable to individual requirements.
- o Effective pathways to ensure consumer information on existing housing programs
- o Services for those who are dually-diagnosed.
- o Outreach to individuals who resist or cannot access the traditional mental health service system.
- o Convenient transportation available at varied times.

Persons with Alcohol and Other Addictions

Alcohol or other drug abuse is defined as an excessive and impairing use of alcohol or other drugs, including addiction. Persons who are classified with alcohol or other addictions may have a history of inpatient treatment (detox), be identified by current symptomatology or by an assessment of current intake, and by some combination of these approaches. The National Institute of Alcohol Abuse and Alcoholism estimates the number of men with drinking problems at 14% to 16%, and the number of women with similar problems at 6%. No similar statistics exist for abuse of other drugs. However, the National Institute of Alcohol Abuse and Alcoholism estimates that one-third or more of the clients in publicly funded residential group programs are homeless most of the year before entering treatment. Since this group is without housing and medical insurance, it is assumed that they are low income and in need of supportive housing.

There is no source of data to determine the extent of this population in Lehigh County. If the national estimated percentages of men and women with alcohol addictions are applied to the 2000 population, approximately 21,077 to 24,088 men and 9,692 women in Lehigh County may have drinking problems.

Persons Diagnosed with AIDS and Related Diseases

In Pennsylvania, AIDS and HIV infections are reportable conditions. The Pennsylvania Department of Health maintains a registry of reported cases on a County basis. At the end of 2005 (the most recent date for which data is available), the state reported that there were 435 persons living with AIDS in Lehigh County.

The housing needs and problems of people living with HIV and AIDS are similar to those of people of similar health or socio-economic status. Many people living with HIV and AIDS have other psychosocial, health, and emotional problems such as chemical dependency and mental health problems. Key housing problems include affordability, security, transportation, and child care issues. Financial constraints are central to most housing issues faced by people living with HIV and AIDS in the community. Financial problems often appear to be accentuated by the inability to work and expenses for medical care and medicines beyond the scope of insurance.

The housing needs of people living with HIV and AIDS are diverse. Housing programs targeting the population need to be flexible enough to address a wide range of needs and problems. Programs should focus on helping people with HIV and AIDS to stay in their own homes. Housing programs may need to find ways to address underlying causes and related problems such as alcohol and drug services, mental health services, benefits counseling, and public transportation.

Housing programs for persons with HIV and AIDS should include the following:

- o Direct financial or in-kind assistance to clients, specifically rental and mortgage assistance.
- o Direct services, specifically case management and in-home services.
- o A flexible indirect assistance component that provides a pool of funds to address multiple housing concerns such as utility assistance, home improvements and renovations.

Public Housing Residents

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

The groups most likely to benefit from self-sufficiency programs are the very low and low income individuals and families in public and assisted housing. These groups, along with those in temporary homeless shelters and transitional housing, could utilize self-sufficiency skills to gain control of their lives.

In Lehigh County there exists a waiting list of persons desiring to rent a public housing unit. As of January 2005, there were 923 applicants on file waiting for available units from the Lehigh County Housing Authority. Of these, 560 (61%) were minority households and another 144 (15%) were households with a disabled member. The greatest need is for two-bedroom units for non-elderly individuals.

Also in January 2005, there were 918 applicants on the Section 8 waiting list. There were 425 (46%) minority households and 163 (18%) were households with a disabled member. The Section 8 waiting list is closed and the waiting period is approximately two years.

Domestic Violence

There are few housing facilities serving victims of domestic violence in Lehigh County. Turning Point is the only Domestic Violence agency that provides shelter exclusively for victims of domestic violence. Turning Point also offers limited transitional housing.

During 2005-2006, 2,515 Lehigh County victims of domestic violence sought assistance from Turning Point. Fleeing because of violence in their homes, 240 women and children spent 4,983 bednights (1 person per bed per night) in the emergency shelter. The need for housing for victims of domestic violence is currently high and growing in the region. The challenge in operating such housing is the need for housing subsidies, often at 100%, and funding for staff and support services. An expanded voucher subsidy (TBRA) program could be used to provide much needed assistance to move women and children from the shelter to permanent housing.

Priority Housing Needs (91.215 (b))

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

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

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

5 Year Strategic Plan Priority Housing Needs response:

1. Priority housing needs and activities

	0-30% MFI		31-50% MFI		51-80% MFI	
	Renters	Owners	Renters	Owners	Renters	Owners
ELDERLY						
Any Housing Problem	High	High	Medium	Medium	Medium	Low
Cost Burden >30%	High	High	Medium	Medium	Medium	Low
Cost Burden >50%	Medium	Medium	Low	Low	Low	Low
SMALL RELATED						
Any Housing Problem	High	High	High	High	Medium	Medium
Cost Burden >30%	High	High	High	High	Medium	Medium
Cost Burden >50%	Medium	High	Low	Medium	Low	Low
LARGE RELATED						
Any Housing Problem	High	High	High	High	Medium	Medium
Cost Burden >30%	High	High	Medium	High	Low	Medium
Cost Burden >50%	Medium	High	Low	Low	Low	Low
ALL OTHER						
Any Housing Problem	High	High	High	High	Medium	Medium
Cost Burden >30%	High	High	High	High	Medium	Medium
Cost Burden >50%	Medium	High	Medium	Medium	Low	Low

Source: U.S. Department of Housing and Urban Development (HUD), State of the Cities Data Source

Lehigh County assigned priorities for housing needs based on the information provided in the prior section (see table above).

Highest Priority activities include eligible CDBG projects that will create an impact on the community. Projects that stimulate the redevelopment of the community, enhance the quality of life and expand housing choice will be considered high priority. High priority will be given to all family types and very low, low and moderate income levels. (See above table for specific categories.)

Medium Priority is given to projects for household types with incomes over 80% of median.

There were no housing needs assigned a low priority.

Housing funds will be allocated using the following strategies:

Retain existing housing stock — rehabilitation assistance is needed for both owner and renter occupied housing.

Development of additional affordable housing — housing to be developed by private investment and non-profit organizations

Development of rental housing — utilize CHDO's and nonprofit organizations to provide financial and technical assistance in developing housing facilities for the very low income and low income renters.

Homebuyer's assistance — down payment and closing cost assistance for low and moderate-income homebuyers.

The following are the housing priorities and activities:

- **Priority: Preservation of the existing owner occupied affordable housing stock in residential neighborhoods.**

Goal: Assist 100 lower income households through FY 2011 through housing rehabilitation programs

Proposed Activities: Owner Occupied Housing Rehabilitation Program

Description and Proposed Accomplishments - Owner-Occupied Rehabilitation: The County will initiate an owner-occupied Housing Rehabilitation Program, which provides financial assistance to low- and moderate-income homeowners. The financial assistance is provided for the repair or rehabilitation of substandard housing to meet local building code and Section 8 Housing Quality Standards, and to ensure safe and sanitary living conditions.

Geographic Distribution: All funds will be distributed Countywide outside of the cities of Allentown and Bethlehem and Lower Macungie Township.

- **Priority: Preservation of Affordable Rental Housing**

Goal: Assist 200 rental units that are affordable to lower income households

Description and Proposed Accomplishments: Rehabilitation and modernization assistance is received by LCHA for public housing that it owns and operates. Should HOME funds become available to the County, financial assistance would be made available to housing owned by non-profit organizations that provide publicly assisted housing that is affordable to lower income households. Assistance could be used for major systems repairs, replacement of fixtures and infrastructure, weatherization improvements, and assistance with adaptive modifications and accessibility improvements.

Rehabilitation and modernization assistance for assisted rental housing will assist up to 100 households over the next five years. Assisted households include elderly households, small households, large households, and all other households. Assisted households will be primarily extremely low income.

- **Priority: Increase homeownership for lower income households through homebuyer assistance and new construction.**

Goal: Assist 100 lower income households to achieve homeownership

Description and Proposed Accomplishments: Should the County become a HOME Entitlement Community, funds will be used for a homebuyer program to provide down payment assistance. Funds can be used to write-down the cost of homes to prices that are affordable to lower income households. Such a program will be pursued with active involvement from local banks and mortgage companies that can provide permanent mortgage financing for low- and moderate-income homebuyers. The County anticipates assisting 15 to 20 low- and moderate-income households annually, either current renters or owners, of all family sizes.

Geographic Distribution: The homebuyer assistance will be available County-wide.

- **Priority: Development of affordable housing**

Goal: Assist development of 200 rental units that are affordable to lower income households

Description and Proposed Accomplishments: Provide subsidies to for-profit or non-profit developers to construct rental housing units for households at or below 50 percent of MFI. The housing development program would be funded County-wide.

To address unmet or overburdened needs, the County encourages rental projects that include the following.

- Those that provide project based rental assistance.
- Those serving the lowest income households.
- Set-asides for disabled households.
- Units with supportive services for seniors 75 and over.

2. Analysis of the characteristics of the housing market

Affordability

Of all low or moderate income residents, over 52.9% of the renters and 46.8% of the owners are defined as having housing problems related to paying over 30% of their income towards housing expenses according to the data provided by HUD from the 2000 U.S. Census.

Condition

Based on the housing element, over 60% of the housing stock in Lehigh County is over 40 years old.

Accessibility

16,910 residents over the age of 65 reported a disability on the 2000 census. The total number of citizens over the age of 65 is 49,434 persons. The elderly and disabled population in Lehigh County is expected to increase over time as the baby boomers enter into retirement age. The increase in this population sector will mean there will be more persons requiring housing that is adaptable to their physical needs over the next five years.

3. Basis for assigning the priority given to each category of priority needs

The priorities presented were developed by:

- 1) Weighing the severity of the need among all groups and sub groups
- 2) Analyzing the current social, housing or economic conditions
- 3) Analyzing the relative needs of low and moderate income families
- 4) Assessing the resources likely to be available over the next five years.

The housing market in Lehigh County has become very expensive. The cost of housing has grown beyond the reach of the workforce and lower income households. Therefore, all efforts to expand housing choice and preserve the affordable units currently available for any category of family type and lower income level are high priority.

4. Obstacles

The most difficult obstacle to meeting the needs of the underserved will be a considerable lack of public and private resources to fully address the priorities identified in this Strategic Plan. Building the organizational infrastructure to undertake projects and programs that rehabilitate and expand the housing supply will also be challenging. In the Lehigh Valley Housing Needs Assessment, the findings indicated that:

- There are opportunities available for more collaborative initiatives between for-profit developers and nonprofit organizations in the Lehigh Valley. By partnering with an experienced for-profit developer, a smaller nonprofit can enhance its capacity in budgeting, planning, financing and construction management skills.
- There are also opportunities for public housing authorities to create new affordable housing outside of HOPE VI funding.
- Developers identified the insufficient supply of land zoned for multi-family housing as one of the factors driving up the cost of land acquisition and development. Outreach initiatives focused on educating public officials and planning commissions on the benefits of affordable housing may encourage the rezoning of more land to multi-family zoning designations, as well as eliminate unnecessary and excessive development standards for multi-family housing.
- Active and productive nonprofit housing developers need ready access to capital in order to finance the front-end soft costs associated with new development. Utilizing a lesser-restrictive source of financing for this (such as Act 137 Housing Trust Fund

resources) would enable nonprofits to seek out more development opportunities and fully investigate the financial feasibility of potential projects early on.

Housing Market Analysis (91.210)

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

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

5 Year Strategic Plan Housing Market Analysis responses:

1. General Housing Stock Characteristics

Characteristics of Lehigh County's existing housing stock are described in this section of the Five Year Strategic Plan.

The U.S. Department of Housing and Urban Development (HUD) defines affordable housing as housing in good condition that does not cost more than 30% of a household's annual income. For example, a household with an annual income of \$30,000 can spend up to \$9,000 per year (\$750 per month) on housing. Anything above that amount would be unaffordable for such a household. Naturally, not all households make the same amount of money. Therefore, HUD uses the median family income for an area in order to determine what is affordable to the majority of households. While identifying how much a household can afford is a relatively straightforward calculation, it is a lot more difficult to identify how much of the available County housing stock is in good condition and affordable to various income levels. In addition, it is necessary to determine how much of the existing housing stock is affordable and available for rent versus ownership.

Housing Inventory

The 2000 Census reported that there were a total of 128,910 housing units in Lehigh County (including Allentown, Bethlehem, and Lower Macungie Township). This represented a net increase of 50.2% since 1970.

Table 14
Increase in Housing Units in Lehigh County, 1970-2005

	Lehigh County		Pennsylvania	
	Units	% Change	Units	% Change
1970	85,809	-	3,927,206	-
1980	106,005	23.5%	4,512,674	14.9%
1990	118,335	11.6%	4,938,140	9.4%
2000	128,910	8.9%	5,249,750	6.3%
2005	135,188	4.9%	5,422,362	3.3%
1970-2000 change	43,101	50.2%	1,322,544	33.7%
2000-2005 change	6,278	4.9%	172,612	3.3%

Source: U.S. Census Bureau

All of the municipalities except for one experienced a gain in housing units. The rate of increase varied by municipality, from 1% in Slatington Borough to 61% in Alburtis Borough. The following table provides the change in housing units by municipality from 1990 to 2000.

Table 15
Change in Housing Units by Municipality 1990-2000

	1990	2000	% Change
Alburtis Boro.	502	806	61%
Catasauqua Boro.	2,625	2,747	5%
Coopersburg Boro.	958	1,050	10%
Coplay Boro.	1,350	1,484	10%
Emmaus Boro.	4,870	5,198	7%
Fountain Hill Boro.	1,936	2,029	5%
Hanover Twp.	1,045	937	-10%
Heidelberg Twp.	1,082	1,244	15%
Lower Milford Twp.	1,151	1,308	14%
Lowhill Twp.	578	703	22%
Lynn Twp.	1,217	1,443	19%
Macungie Boro.	1,147	1,418	24%
North Whitehall Twp.	4,059	5,473	35%
Salisbury Twp.	5,071	5,281	4%
Slatington Boro.	1,849	1,867	1%
South Whitehall Twp.	6,689	7,154	7%
Upper Macungie Twp.	3,343	5,335	60%
Upper Milford Twp.	2,222	2,564	15%
Upper Saucon Twp.	3,360	4,117	23%
Washington Twp.	2,340	2,594	11%
Weisenberg Twp.	1,119	1,514	35%
Whitehall Twp.	9,762	10,744	10%

Source: U.S. Census Bureau

Types of Housing Units

The 2000 Census reported that single-family homes (both detached and attached units) remained the dominant housing choice. 72% of the County housing inventory was single family units, 26% was multi-family units and 5% was mobile homes.

Table 16
Units per Structure, 2000

	Total Units	Single Family	Multi-Family Units			Mobile Homes
			2-4 Units	5-19 Units	20+ Units	
Lehigh County	128,910	72%	10%	10%	6%	2%
Pennsylvania	5,249,750	74%	10%	6%	5%	5%

Source: U.S. Census Bureau

Tenure and Vacancy Status

For all of Lehigh County, 5.4% of the housing stock was vacant. For the entitlement area, the vacancy rate is 3.7%. The following table provides the percent of vacant housing units in Lehigh County within the entitlement area by municipality and township.

Table 17
Percent of Vacant Housing Units in Lehigh County, 2000

	Total Units	Occupied	% Vacant
Alburtis Boro.	806	772	4.2%
Catasauqua Boro.	2,747	2,616	4.8%
Coopersburg Boro.	1,050	983	6.4%
Coplay Boro.	1,484	1,431	3.6%
Emmaus Boro.	5,198	4,983	4.1%
Fountain Hill Boro.	2,029	1,911	5.8%
Hanover Twp.	937	892	4.8%
Heidelberg Twp.	1,244	1,196	3.9%
Lower Milford Twp.	1,308	1,277	2.4%
Lowhill Twp.	703	677	3.7%
Lynn Twp.	1,443	1,388	3.8%
Macungie Boro.	1,418	1,366	3.7%
North Whitehall Twp.	5,473	5,250	4.1%
Salisbury Twp.	5,281	5,138	2.7%
Slatington Boro.	1,867	1,743	6.6%
South Whitehall Twp.	7,154	6,943	2.9%
Upper Macungie Twp.	5,335	5,128	3.9%
Upper Milford Twp.	2,564	2,516	1.9%
Upper Saucon Twp.	4,117	3,970	3.6%
Washington Twp.	2,594	2,512	3.2%
Weisenberg Twp.	1,514	1,458	3.7%
Whitehall Twp.	10,744	10,376	3.4%
Pennsylvania	5,249,750	4,777,003	9.0%

Source: U.S. Census Bureau

Lehigh County has a high rate of homeownership at 68.8%. The homeownership rate varies from 91.4% in Weisenberg Township to 55% in Hanover Township. The following table provides the homeownership rate by municipality.

Table 18
Municipal Home Ownership Rates in Lehigh County, 2000

	Total Occupied Units	Owner- Occupied Units	Home Ownership Rate
Alburtis Boro.	772	650	84.2%
Catasauqua Boro.	2,616	1,769	67.6%
Coopersburg Boro.	983	695	70.7%
Coplay Boro.	1,431	1,079	75.4%
Emmaus Boro.	4,983	3,173	63.7%
Fountain Hill Boro.	1,911	1,274	66.7%
Hanover Twp.	892	491	55.0%
Heidelberg Twp.	1,196	1,084	90.6%
Lower Milford Twp.	1,277	1,162	91.0%
Lowhill Twp.	677	614	90.7%
Lynn Twp.	1,388	1,145	82.5%
Macungie Boro.	1,366	801	58.6%
North WhitehallTwp.	5,250	4,578	87.2%
Salisbury Twp.	5,138	4,484	87.3%
Slatington Boro.	1,743	1,060	60.8%
South Whitehall Twp.	6,943	5,723	82.4%
Upper Macungie Twp.	5,128	4,354	84.9%
Upper Milford Twp.	2,516	2,255	89.6%
Upper Saucon Twp.	3,970	3,651	92.0%
Washington Twp.	2,512	2,248	89.5%
Weisenberg Twp.	1,458	1,332	91.4%
Whitehall Twp.	10,376	6,746	65.0%
Pennsylvania	4,777,003	3,406,337	71.3%

Source: U.S. Census Bureau

The following table provides renter rates by municipality. The communities with higher renter rates are, for the most part, also those communities with a high low/mod population as well as areas of racial and ethnic concentration.

Table 19
Rental Rates in Lehigh County, 2000

	Total Occupied Units	Renter Rate
Alburtis Boro.	772	15.8%
Catasauqua Boro.	2,616	32.5%
Coopersburg Boro.	983	29.2%
Coplay Boro.	1,431	24.5%
Emmaus Boro.	4,983	36.2%
Fountain Hill Boro.	1,911	33.3%
Hanover Twp.	892	45.2%
Heidelberg Twp.	1,196	12.5%
Lower Milford Twp.	1,277	9.1%
Lowhill Twp.	677	10.0%
Lynn Twp.	1,388	14.8%
Macungie Boro.	1,366	41.6%
North Whitehall Twp.	5,250	12.8%
Salisbury Twp.	5,138	12.7%
Slatington Boro.	1,743	38.9%
South Whitehall Twp.	6,943	17.5%
Upper Macungie Twp.	5,128	15.9%
Upper Milford Twp.	2,516	10.5%
Upper Saucon Twp.	3,970	8.0%
Washington Twp.	2,512	10.7%
Weisenberg Twp.	1,458	8.7%
Whitehall Twp.	10,376	35.0%
Pennsylvania	4,777,003	28.7%

Source: U.S. Census Bureau

Median Housing Value and Median Gross Rent

The median housing value of a single family home in Lehigh County in 2000 was \$113,600.

The Census Bureau also collected data on the monthly gross rents for rental units, which was defined as the amount of the contract rent plus the estimated average monthly cost of utilities (electricity, gas, and water and sewer) and fuels (oil, coal, kerosene, wood, etc.) if these are paid for by the renter (or paid for the renter by someone else). In 2000, the median gross rent in Lehigh County was \$586.

Table 20
Median Housing Value in Lehigh County
by Municipality, 2000

	Median Value
Lehigh County	\$113,600
Alburtis Boro.	\$98,500
Catasauqua Boro.	\$86,400
Coopersburg Boro.	\$135,500
Coplay Boro.	\$97,000
Emmaus Boro.	\$113,100
Fountain Hill Boro.	\$83,400
Hanover Twp.	\$105,100
Heidelberg Twp.	\$137,400
Lower Milford Twp.	\$172,700
Lowhill Twp.	\$165,900
Lynn Twp.	\$128,100
Macungie Boro.	\$116,800
North WhitehallTwp.	\$160,000
Salisbury Twp.	\$129,900
Slatington Boro.	\$82,600
South Whitehall Twp.	\$139,100
Upper Macungie Twp.	\$174,600
Upper Milford Twp.	\$160,500
Upper Saucon Twp.	\$161,800
Washington Twp.	\$124,800
Weisenberg Twp.	\$163,800
Whitehall Twp.	\$116,400
Pennsylvania	\$97,000

Source: U.S. Census Bureau

Table 21
Change in Median Gross Rent by Municipality 1990-2000

	1990		2000	% Change
	Actual	Adjusted	Actual	
Lehigh County	\$461	\$609	\$586	-3.7%
Alburtis Boro.	\$394	\$520	\$579	11.3%
Catasauqua Boro.	\$427	\$564	\$543	-3.7%
Coopersburg Boro.	\$434	\$573	\$538	-6.1%
Coplay Boro.	\$388	\$512	\$543	6.0%
Emmaus Boro.	\$481	\$635	\$628	-1.1%
Fountain Hill Boro.	\$411	\$543	\$457	-15.8%
Hanover Twp.	\$591	\$780	\$739	-5.3%
Heidelberg Twp.	\$478	\$631	\$596	-5.5%
Lower Milford Twp.	\$461	\$609	\$473	-22.3%
Lowhill Twp.	\$381	\$503	\$554	10.2%
Lynn Twp.	\$429	\$566	\$533	-5.9%
Macungie Boro.	\$541	\$714	\$732	2.5%
North Whitehall Twp.	\$453	\$598	\$619	3.5%
Salisbury Twp.	\$498	\$657	\$651	-1.0%
Slatington Boro.	\$341	\$450	\$554	23.1%
South Whitehall Twp.	\$501	\$661	\$788	19.2%
Upper Macungie Twp.	\$479	\$632	\$864	36.6%
Upper Milford Twp.	\$448	\$591	\$642	8.6%
Upper Saucon Twp.	\$518	\$684	\$706	3.3%
Washington Twp.	\$468	\$618	\$584	-5.5%
Weisenberg Twp.	\$486	\$642	\$682	6.3%
Whitehall Twp.	\$542	\$715	\$661	-7.6%
Pennsylvania	\$404	\$533	\$531	-0.4%

Source: U.S. Census Bureau

The Cost of Housing

The cost of housing is different than the value of housing. The value of a housing unit is determined by assessing comparable units in similar neighborhoods to calculate the amount the unit might sell for. The cost of housing, however, is the calculation of how much a household must earn in order to purchase or rent a housing unit. One of the most credible and widely used sources of information about housing cost and affordability is the National Low Income Housing Coalition's (NLIHC) annual publication Out of Reach.

In Lehigh County, the Fair Market Rent (FMR) for a two-bedroom apartment is \$791. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn \$31,640 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of \$15.21.

In Lehigh County, a minimum wage worker earns an hourly wage of \$5.15. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 118 hours per week, 52 weeks per year. Or, a household must include 3.0 minimum wage earner(s) working 40 hours per week year-round in order to make the two bedroom FMR affordable.

In Lehigh County, the estimated mean (average) wage for a renter is \$11.67 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 52 hours per

week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.3 worker(s) earning the mean renter wage in order to make the two-bedroom FMR affordable.

Housing Condition

The condition of the housing stock in Lehigh County can be determined using census variables chosen to indicate housing deficiency. The age of a structure is used to show the time the unit has been in the inventory and the duration of time for which deterioration can potentially occur. The age threshold commonly used to signal a potential deficiency is approximately 50 years. Another variable used to identify housing condition is overcrowding, which is directly related to the wear and tear sustained by the structure. Generally, the criterion of more than one person per room (1.01) is used as the threshold for defining living conditions as overcrowded.

For the purposes of the Five Year Strategic Plan, the age of the housing stock in the low and moderate income census tracts was identified. Of particular interest are the census tracts containing older housing units and located in areas of concentration of LMI persons and racial and ethnic minorities. Lower income levels typically indicate where the greatest potential for housing deterioration can occur as these households will have less disposable income to pay for regular maintenance and repairs. Without these actions, older homes can rapidly deteriorate.

In Lehigh County, 0.3% of all owner units and 5% of all renter units were overcrowded. The following two tables provide information on housing quality for owner-occupied and renter-occupied units.

Table 22
Housing Quality Indicators of Owner-Occupied Housing Stock 2000

	Total Owner-Occupied Housing Units	Over 50 years old		Lacking complete plumbing		Overcrowded	
		Total	% Owner-Occupied	Total	% Owner-Occupied	Total	% Owner-Occupied
Lehigh County	83,849	12,722	15.2%	79	0.1%	247	0.3%
Alburtis Boro.	655	158	24.1%	0	0.0%	2	0.3%
Catasauqua Boro.	1,767	868	49.1%	0	0.0%	8	0.5%
Coopersburg Boro.	696	271	38.9%	0	0.0%	5	0.7%
Coplay Boro.	1,080	514	47.6%	0	0.0%	0	0.0%
Emmaus Boro.	3,180	1,451	45.6%	8	0.3%	0	0.0%
Fountain Hill Boro.	1,275	912	71.5%	0	0.0%	18	1.4%
Hanover Twp.	489	32	6.5%	4	0.8%	0	0.0%
Heidelberg Twp.	1,046	187	17.9%	8	0.8%	12	1.1%
Lower Milford Twp.	1,161	300	25.8%	0	0.0%	10	0.9%
Lowhill Twp.	609	92	15.1%	0	0.0%	6	1.0%
Lynn Twp.	1,183	431	36.4%	0	0.0%	16	1.4%
Macungie Boro.	798	198	24.8%	0	0.0%	0	0.0%
North Whitehall Twp.	4,577	564	12.3%	6	0.1%	46	1.0%
Salisbury Twp.	4,487	776	17.3%	8	0.2%	15	0.3%
Slatington Boro.	1,065	686	64.4%	0	0.0%	6	0.6%
South Whitehall Twp.	5,725	928	16.2%	0	0.0%	40	0.7%
Upper Macungie Twp.	4,313	357	8.3%	0	0.0%	18	0.4%
Upper Milford Twp.	2,253	646	28.7%	0	0.0%	0	0.0%
Upper Saucon Twp.	3,652	611	16.7%	8	0.2%	10	0.3%
Washington Twp.	2,244	566	25.2%	9	0.4%	23	1.0%
Weisenberg Twp.	1,331	240	18.0%	8	0.6%	0	0.0%
Whitehall Twp.	6,745	1,934	28.7%	20	0.3%	12	0.2%
Pennsylvania	3,406,167	1,303,778	38.3%	14,146	0.4%	36,835	1.1%

Sources: U.S. Census Bureau and the U.S. Department of Housing and Urban Development, State of the Cities Data System

Table 23
Housing Quality Indicators of Renter-Occupied Housing Stock 2000

	Total Renter-Occupied Housing Units	Over 50 years old		Lacking complete plumbing		Overcrowded	
		Number	% Renter-Occupied	Number	% Renter-Occupied	Number	% Renter-Occupied
Lehigh County	38,010	14,572	38.3%	353	0.9%	1,885	5.0%
Alburtis Boro.	122	90	73.8%	0	0.0%	0	0.0%
Catasauqua Boro.	847	470	55.5%	9	1.1%	23	2.7%
Coopersburg Boro.	288	175	60.8%	0	0.0%	25	8.7%
Coplay Boro.	352	190	54.0%	13	3.7%	6	1.7%
Emmaus Boro.	1,810	547	30.2%	9	0.5%	19	1.0%
Fountain Hill Boro.	637	395	62.0%	16	2.5%	9	1.4%
Hanover Twp.	401	18	4.5%	0	0.0%	15	3.7%
Heidelberg Twp.	112	66	58.9%	0	0.0%	0	0.0%
Lower Milford Twp.	115	63	54.8%	0	0.0%	0	0.0%
Lowhill Twp.	63	30	47.6%	0	0.0%	0	0.0%
Lynn Twp.	243	143	58.8%	0	0.0%	0	0.0%
Macungie Boro.	565	133	23.5%	6	1.1%	15	2.7%
North Whitehall Twp.	672	295	43.9%	0	0.0%	8	1.2%
Salisbury Twp.	654	144	22.0%	0	0.0%	22	3.4%
Slatington Boro.	683	411	60.2%	11	1.6%	12	1.8%
South Whitehall Twp.	1,220	218	17.9%	7	0.6%	6	0.5%
Upper Macungie Twp.	774	186	24.0%	0	0.0%	53	6.8%
Upper Milford Twp.	261	131	50.2%	0	0.0%	0	0.0%
Upper Saucon Twp.	319	123	38.6%	0	0.0%	0	0.0%
Washington Twp.	264	106	40.2%	13	4.9%	5	1.9%
Weisenberg Twp.	126	59	46.8%	0	0.0%	0	0.0%
Whitehall Twp.	3,630	608	16.7%	40	1.1%	101	2.8%
Pennsylvania	1,370,836	593,629	43.3%	353	0.0%	54,310	4.0%

Sources: U.S. Census Bureau and the U.S. Department of Housing and Urban Development, State of the Cities Data System

Specific Housing Objectives (91.215 (b))

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

5 Year Strategic Plan Specific Housing Objectives response:

The County expects to focus federal funds toward housing and redevelopment of local communities. The County has been pursuing local planning efforts in redevelopment and CDBG funds will be used to implement these plans.

1. Priorities and Objectives

The goal of the County is to improve the quality of life in local municipalities for extremely low, low and moderate-income, and retain and increase the stock of affordable owner and renter housing units. With this in mind, the following objectives have been established:

Retain existing housing stock — rehabilitation assistance is needed for both owner and renter occupied housing.

Objectives:

- Assist 100 lower income households through FY 2011 through housing rehabilitation programs
- Assist 200 rental units that are affordable to lower income households

Development of affordable housing — utilize CHDO's and nonprofit organizations to provide financial and technical assistance in developing housing facilities for the very low income and low income renters and low to moderate income homebuyers.

- Assist development of 200 rental units that are affordable to lower income households
- Assist in the development of 50 owner occupied housing units.

Homebuyer's assistance — down payment and closing cost assistance for low and moderate-income homebuyers.

- Assist 100 lower income households to achieve homeownership

2. Utilization of Resources

As a new Entitlement community, Lehigh County has only been granted CDBG funds. The County may be eligible for HOME funds at some time in the future. Until then, participation in the HOME program is limited to applying for funds through the Pennsylvania Housing Finance Agency.

The sources of funds that may be available to address each of the objectives stated above is shown on the matrix below:

Table 24
Resources Potentially Available for Housing Objectives

	Rehabilitation of housing stock	Development – Owner occupied	Development – Rental Properties	Homebuyer Assistance
CDBG	X	X		
HOME	X	X		X
Act 137 Affordable Housing Trust Fund	X	X	X	
Penn HOMES			X	
LIHTC			X	
NRI – PHFA	X	X		X
HRA – DCED	X	X	X	
LCHA – Sec 8				X
Public Housing CFP	X			

Needs of Public Housing (91.210 (b))

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

5 Year Strategic Plan Needs of Public Housing response:

The Lehigh County Housing Authority (LCHA) operates 289 public housing units scattered throughout the County. The Housing Authority does not intend to demolish or construct any new public housing in the foreseeable future.

Recent initiatives by the LCHA to improve operations and performance have led to an occupancy rate above 98%. Over the next two years LCHA will begin an extensive upgrade of the fire prevention, control and alarm systems in all Public Housing properties.

The Authority works closely with the Good Shepherd Rehabilitation Center and the Center for Independent Living in Allentown, PA to keep up with the current technologies available to help to meet the needs of our residents with disabilities. Authority management manages a facility in Bethlehem that is designed for and leased to persons with severe physical disabilities. In addition LCHA manages a 20 unit independent living facility designed for and occupies by

persons with mental illness. The Authority owns 12 homes used as group homes for persons with mental retardation. LCHA works closely with the providers of care at these facilities to ensure they are meeting the needs of those residents. Since the Authority is not planning to rehabilitate any existing properties or to build any new properties the extent of our physical accommodation work is by request of existing or prospective residents of the current facilities. The Authority will also take requests from caregivers or agencies representing persons with disabilities. The Authority stated that they remain dedicated to making reasonable accommodation based upon it policies and procedures.

The following table provides information on the waiting list of applicants for public housing and Section 8.

Table 25
Public Housing and Section 8 Waiting List

	Public Housing		Section 8	
	Number	Percent	Number	Percent
Waiting List Total	923	100%	918	100%
Extremely Low Income (<30% MFI)	796	86%	549	60%
Very Low Income (>30% but <50% MFI)	127	14%	369	40%
Low Income (>50% but <80%)	0	0%	0	0%
Families with Children	584	64%	542	60%
Elderly Households (1 or 2 persons)	98	11%	145	16%
Individuals/Families with Disabilities	144	16%	163	18%
White Households	345	38%	484	52%
Black Households	269	30%	154	16%
Other Race of Households	18	1%	9	1%
Hispanic Households	291	31%	271	31%
Characteristics by Bedroom Size: Housing Needs				
0 Bedrooms		0%	N/A	0%
1 Bedroom	306	33%	N/A	0%
2 Bedrooms	327	35%	N/A	0%
3 Bedrooms	282	31%	N/A	0%
4 Bedrooms	8	1%	N/A	0%
5 Bedrooms	0	0%	N/A	0%
5+ Bedrooms	0	0%	N/A	0%

Source: Lehigh County Housing Authority, 2007

Public Housing Strategy (91.210)

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

5 Year Strategic Plan Public Housing Strategy response:

1. Maintenance of Housing and Suitable living environment:

The Lehigh County Housing Authority provides 289 units of public housing scattered throughout Lehigh County. The Authority meets the HUD guidelines for income targeting as a means of serving the lower income residents of the County. Preference for public housing and Section 8 Vouchers is given to Lehigh County residents and to those enrolled in education programs or working. For Section 8 Vouchers only, preference is given to those residing in "affordable housing with restrictive covenants." This ensures that such affordable housing is accessible to the lowest income tenants and not just those at or below 80% of the area median income.

The Lehigh County Housing Authority maintains the public housing units on an on-going basis utilizing the Capital Fund Program. Housing units are in very good condition. The new Executive Director is implementing two Asset Management Plans; one in each northern and southern Lehigh County. The small scale (4 to 25 units) of family public housing does not permit asset management at the level of each development.

2. Public Housing Resident Participation

Family Self-Sufficiency programs are provided to families in Section 8 as well as Public Housing. The participants tend to be Section 8 families. Currently there are 9 families participating but the capacity is 60 families. The Family Savings Account program is available to residents who participate in FSS. This enables families to save money for larger purchases, education or homeownership.

Given the dispersed nature of the family housing in particular, tenants are not generally involved in management. A few public housing families have agreed to be representatives for the purposes of reviewing the Annual Plan. The Senior developments in both Emmaus and Slatington have active Resident Advisory Boards. These boards tend to focus on recreation

issues including lobbying the municipality about cable TV access. A tenant safety campaign is also underway promoting the use of Emergency call buttons. A new RAB is being created in the Fountain Hill senior development.

The Authority concluded a 5(h) Homeownership program in 2006. Twenty (20) public single family scattered site housing units were converted to homeownership. At this time there are no plans to repeat this program. Homeownership is difficult for Section 8 residents due to the cost of housing in the Lehigh Valley and the new caution being applied to the sub-prime market for loans.

3. The Lehigh County Housing Authority is not a troubled agency.

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

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

5 Year Strategic Plan Barriers to Affordable Housing response:

1. Public Policy

The Affordable Housing Policy Advisory Committee and the Land Use Planning subcommittee in particular, has examined the issue of local public policy and its impact on the ability of the communities in the County to provide affordable housing. The Housing Needs Assessment prepared for the Bi-County Planning Commission also addressed these questions.

The following impediments to developing affordable housing in the Lehigh Valley were identified by developers and others interviewed for the Bi-County Planning Commission assessment:

- The high cost of land, specifically undeveloped land.
- Difficulty in finding land.
- Inadequate supply of development sites in general.
- Insufficient supply of land zoned for multi-family housing.
- Relocation and demolition costs in projects involving site assembly.
- The NIMBY ("Not In My Backyard") response.
- In distressed areas, achievable rents are too low to meet operating expenses, thereby making some projects unfeasible too finance or require high subsidies.
- The increasing costs of ongoing property management such as real estate taxes, insurance, management and maintenance, which make it difficult for developers to offer quality management services, thereby making smaller projects less viable.

- The cost of lead-based paint abatement is significantly increasing the rehabilitation cost of older housing units, and subsequently, causing a decrease in the number of housing units rehabilitated.
- Non-profit developers having an inadequate supply of capital to meet predevelopment expenses severely limits their ability to explore the feasibility of potential projects as prospects arise.
- Total development costs are greater than achievable sales price for homeownership projects. As a result, the actual cost of developing housing can be twice as high as the sales price of affordable units to lower income households.
- In high growth areas, market rate projects offer higher profit margins to builders and developers thereby reducing the supply of labor and number of firms interested in affordable housing.
- Market rate transactions on owner-occupied dwellings offer fewer challenges and higher commissions to Realtors.
- Continuously shrinking state and federal funding sources to subsidize affordable housing projects.

2. Strategy to remove or ameliorate negative effects of public policies

Recommendations of each the Bi-County Planning Commission and the Affordable Housing Policy Advisory Committee shall constitute the strategy that the County will adopt for this Strategic Plan. The Bi-County Planning Commission Housing Assessment offered the following recommendations:

- There are opportunities available for more collaborative initiatives between for profit developers and nonprofit organizations in the Lehigh Valley. By partnering with an experienced for-profit developer, a smaller nonprofit can enhance its capacity in budgeting, planning, financing and construction management skills.
- There are also opportunities for public housing authorities to create new affordable housing outside of HOPE VI funding.
- Developers identified the insufficient supply of land zoned for multi-family housing as one of the factors driving up the cost of land acquisition and development. Outreach initiatives focused on educating public officials and planning commissions on the benefits of affordable housing may encourage the rezoning of more land to multi-family zoning designations, as well as eliminate unnecessary and excessive development standards for multi-family housing.
- Active and productive nonprofit housing developers need ready access to capital in order to finance the front-end soft costs associated with new development. Utilizing a lesser-restrictive source of financing for this (such as Act 137 Housing Trust Fund resources) would enable nonprofits to seek out more development opportunities and fully investigate the financial feasibility of potential projects early on.

Further, the Affordable Housing Policy Advisory Committee offered recommendations related to public policy:

- Educate and inform owners of tax-credit development and County assessors about Act 39 of 2003 (HB 1854), a new law that instructs assessors to consider rent restrictions, affordability restrictions, and the income approach to value rather than comparable sales approach to value, when assessing affordable housing developments.

- Encourage municipalities to consider a “streamlined” approach to obtain permits and funding for affordable housing projects.
- Develop model inclusionary housing ordinance. This ordinance could provide financial and other incentives to developers in exchange for the provision of a percentage of housing units set aside for households with incomes at or below 80% of the area median income.
- Encourage municipal officials to revise their local zoning ordinances to reflect more opportunities for affordable housing development. Using cost-benefit analyses, illustrate how family housing and clustered single family development can be more cost-effective to local elected officials. Encourage local units of government to revise their ordinances to be consistent with the Lehigh Valley Comprehensive Plan.
- Use the designated Urban Areas as incentives for affordable housing project applications. These geographic locations include areas where infrastructure already exists or could be expanded most effectively, prevents further sprawl, and preserves open space and agricultural areas.
- Provide relief from impact fees to developers who build affordable housing units but encourage their use to the maximum extent possible on market rate housing. consider providing relief to schools as well.
- Advocate amending the MPC to require Fair Share Housing. Work to amend the MPC to require all municipalities to provide the opportunity for their fair share of affordable housing units, including new family units, new elderly units, the adaptive re-use of underutilized building, homebuyer assistance, housing rehabilitation, and other creative mechanisms. Amending the MPC is a top priority of the Pennsylvania State Planning Board.
- Encourage land use policies that diversify the affordable housing stock in the Valley to address needs of smaller families, people with disabilities needing supportive housing, and seniors; encourage multi-use, residential development in commercial structures in business zones; and encourage village style/mixed use development. Village centers will contain a mix of stores, restaurants, professional offices that would be appropriate settings for low to moderate-income housing at an increased density.
- Support the adoption of building codes that facilitate the rehabilitation of existing homes. (In many communities, older homes undergoing moderate levels of rehabilitation must also include additional renovations to bring them into compliance with current building standards that increase significantly the cost of rehab. Many communities have adopted a model rehabilitation code by the International Code Council).
- Investigate the development of an "Affordable Housing Legal Defense Fund" that would provide legal support for efforts to challenge ordinances that prevent affordable housing development.

HOMELESS

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

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

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

5 Year Strategic Plan Homeless Needs response:

Nature and Extent of Homelessness

Lehigh County is part of the larger Northeast Regional area for purposes of planning within the Continuum of Care. The regional Continuum of Care (CoC) was established by the state for the purposes of applying for funding through the U.S. Department of Housing and Urban Development. Agencies seeking funding through the Stewart B. McKinney programs (Supportive Housing Program, Shelter Plus Care, etc.) must be part of a cooperative effort within their communities. There are 12 counties and the 3 entitlement communities (Allentown, Bethlehem and Easton) recognized in the NE Regional CoC.

For the purposes of local planning, homelessness is best understood throughout the Lehigh Valley which spans Lehigh and Northampton Counties as well as the cities of Allentown, Bethlehem and Easton.

Each year a Point in Time count is made of the persons residing in shelter and transitional facilities and living unsheltered in the Northeast region. In addition, the CACLV conducts a shelter census to determine the utilization of persons in homeless shelters in the Lehigh Valley.

The 2006 NE RAB Continuum of Care application depicted the number of homeless persons in the NE Region. This region includes:

Table 26
Homeless Population

Part 1: Homeless Population	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Number of Families with Children (Family Households):	49	80	0	129
1. Number of Persons in Families with Children:	118	257	0	375
2. Number of Single Individuals and Persons in Households without Children:	129	43	42	214
(Add Lines Numbered 1 & 2) Total Persons:	247	300	42	589
Part 2: Homeless Subpopulations	Sheltered		Unsheltered	Total
a. Chronically Homeless (For sheltered, list persons in emergency shelter <i>only</i>)	96		13	109
b. Severely Mentally Ill	107		*	
c. Chronic Substance Abuse	109		*	
d. Veterans	39		*	
e. Persons with HIV/AIDS	7		*	
f. Victims of Domestic Violence	111		*	
g. Unaccompanied Youth (Under 18)	9		*	

*Optional for Unsheltered

CoC-K

Source: Continuum of Care application, NE RAB, 2005

Based on the inventory of facilities available and the number of homeless persons, it was determined that there is a need for 21 Transitional Housing beds and 78 Permanent Housing beds for families. There is also a need for 81 Permanent Housing beds for individuals, of which 47 should be reserved for persons who are chronically homeless.

The CACLV Census provides a more detailed demographic picture of homelessness. Annually, the CACLV undertakes a homeless shelter census and street count of those who are not living in shelter. The following are some of the most significant facts from the 2005 report:

- **Homeless Population:** 2,591 men, women, and children were housed in the Lehigh Valley's nine emergency and short-term transitional shelters.
- **Children:** 923 (35.6%) of the residents in the shelters were children, with those under the age of 5 representing 45% of the total number of children.
- **Adults:** 1,668 adults were housed in shelters, with 407 housed in family programs and 1,261 housed in individual programs. Of those, 672 were females and 996 were males. The age group with the largest number of shelter residents was the group between the ages of

38-42. A total of 62.9% of adults were single, 8.7% were married, 15.9% were divorced, and 8.8% were separated.

- **Average Number of Days Spent in Shelter:** Children spent an average of 36.7 nights in a shelter, adults spent an average of 30.6 nights.
- **Size of Family:** 69% of families had two or fewer children.
- **Age of Mother at First Child's Birth:** 43.9% of the mothers had their first child before the age of 19 and 13.4% had their first child before the age of 16 years.
- **Racial/Ethnic Background:** Sheltered adults identified their racial/ethnic backgrounds as: 50.7% Caucasian, 23.5% African American, 23.6% Latino/Hispanic, 0.7% Multi-Racial, 0.4% Native American, 0.4% Asian American, and 0.7% Other. Racial/ethnic backgrounds of children were identified as: 38.3% Latino/Hispanic, 21.2% Caucasian, 25.5% African American, 13% Multi-Racial, 0.4% Asian American, 0.1% Native American, and 1.9% Other.
- **Education:** 67.2% of adults had attained at least a high school diploma, GED, or post-secondary schooling.
- **Employment:** 22.8% of adults were employed and 34% of families were headed by an employed adult. Domestic violence was the primary reason for unemployment for heads-of-households.
- **Income:** 44.8% of shelter residents had no income and 32.7% had incomes below 75% of poverty, or less than \$11,753 for a family of three.
- **Places of Former Residence:** Before coming to the shelter, 52.2% of shelter residents indicated that they formerly lived in one of the suburban municipalities, 70.3% lived in Allentown, 26.5% in Bethlehem, and 17.5% in Easton.
- **Reason for Leaving Former Residence:** The primary reason for leaving place of former residence was non-payment of rent.

The number of households at risk of becoming homeless is a much more difficult item to quantify.

Priority Homeless Needs

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

5 Year Strategic Plan Priority Homeless Needs response:

1. Homeless Prevention Priorities:

The NE RAB places an emphasis on chronic homelessness. Local efforts at homeless planning have also focused on the chronic homeless. However, the needs of homeless families who are more episodically homeless have also been raised by local agencies in the course of development of this plan. Victims of domestic violence, families priced out of their housing, and families living doubled and tripled up are increasingly common.

The most significant gap appears to be in the area of prevention. The Regional RAB covers too broad an area to be effective at addressing Lehigh County's specific housing issues that lead to homelessness. There needs to be a coordinated local effort to identify factors that contribute to family homelessness and services that prevent homelessness.

2. Chronic Homelessness

The Northeast Regional Housing Advisory Board (RHAB) places a high priority on homeless families and individuals including those who are chronically homeless. Shelter, transitional and permanent supportive housing are each valuable components of the overall Continuum-of-Care and there are unmet needs for both transitional and permanent housing.

Between Feb 1, 2005 and January 31, 2006, there was an increase in the number of beds occupied by chronically homeless individuals. This demonstrates that all permanent housing providers are responding to the need to prioritize resources for the chronically homeless. It also demonstrates the success of the Lehigh County Conference of Churches' program that provides case management and other services to the chronically homeless and assisting them to access permanent housing.

Lehigh County is part of a larger continuum of care encompassing 12 counties. The advantage to this is that Lehigh and Northampton Counties are the beneficiaries of a larger pro-rata share than would otherwise be available to the counties. The disadvantage is that planning becomes more difficult given the diversity within the larger region. The First Lady of the City of Allentown recognized this shortcoming and organized a planning effort focused on the chronically

homeless. Although its mission was to address homelessness in Allentown, the reality is that homeless persons are going to find their way to the city because services and facilities are not available in the more rural countryside. Allentown's Plan to End Chronic Homelessness by 2017 is expected to be publicly presented and adopted during the summer, 2007.

In summary, the chronic homeless plan identifies objectives related to Prevention, Intervention, Organizational Infrastructure and a regional approach.

Homeless Inventory (91.210 (c))

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

5 Year Strategic Plan Homeless Inventory response:

The Lehigh Valley has a very extensive network of shelters and housing programs. The Lehigh Valley benefits from regional membership as it is an importer of dollars. HUD assigns a pro-rata share based on population. The Lehigh Valley allocation is approximately 64% of the regional allocation from HUD but agencies located in the Valley are funded at a much higher percentage – nearly 100% in 2005.

Table 28
Fundamental Components in CoC System

Fundamental Components in CoC System - Housing Activity Chart (CoC-G)									
EMERGENCY SHELTER									
		Target Pop.		2005 Year-Round Units/Beds				2005 Other Beds	
Provider Name	Facility Name	A	B	Family Units	Family Beds	Individual Beds	Total Year Round	Seasonal	Over-flow/Voucher
Current Inventory									
Allentown Rescue Mission	Lehigh Emergency Shelter	SM				42	42	8	
Community Action Committee of the Lehigh Valley, Inc.	6th Street Shelter	FC		19	88		88		
Salvation Army	Hospitality House	M		8	45		45		
Turning Point of Lehigh Valley	Lehigh Shelter	FC	DV	8	26		26		
Valley Youth House	Valley Youth House	YMF				12	12		
Center City Ministries (Northampton County)	Northampton Shelter	SM				22	22		
Community Action Committee of the Lehigh Valley, Inc.	Safe Harbor * Easton	SMF				26	26		
New Bethany Ministries	THP Shelter & Bridge Housing	FC		10	34		34		
Third Street Alliance for Women & Children, Inc.	Third Street Alliance	FC		10	21		21		
Turning Point of Lehigh Valley, Inc.	Turning Point	FC	DV	7	27		27		
Victory House of Lehigh Valley	Victory House	SM				22	22		
		TOTALS		62	241	124	365	8	

Transitional Housing							
Provider Name	Facility Name	Target Pop		2005 Year-Round Units/Beds			
		A	B	Family Units	Family Beds	Individual Beds	Total Year Round Beds
Current Inventory							
Allentown Rescue Mission	Christian Living Transitional Program	SM				20	20
Allentown Rescue Mission	Alpha Omega Recovery Program	SM				16	16
Community Action Committee of the Lehigh Valley, Inc.	6th Street Shelter Turner St. Apts.	FC		12	28		28
Community Action Committee of the Lehigh Valley, Inc.	6th Street Shelter Ferry St. Apts.	FC		10	20		20
Lehigh County Housing Authority	Bridge Housing	FC		8	28		28
Step by Step, Inc.	Richland Apts.	SMF	DV			2	2
Step by Step, Inc.	8th Street	SMF	DV			4	4
Step by Step, Inc.	375 Linden Street	SMF	DV			2	2
Step by Step, Inc.	Weil Street	SMF	DV			4	4
The Program for Women & Families, Inc.	Transitional Residence	FC		7	17	2	19
Turning Point of Lehigh Valley	5th St. Starting Point	FC	DV	4	12		12
Easton Area Neighborhood Centers, Inc.	Roofover (ESG)	FC		6	22		22
Center City Ministries (Northampton County)	TH Northampton Easton	SM				7	7
New Bethany Ministries	THP Shelter & Bridge Housing	FC		3	14		14
New Bethany Ministries	Restoration House Apartments	FC		10	23	19	42
Step by Step, Inc.	Center St. C.R.R.	SMF	DV			9	9
Step By Step, Inc.	Main Street C.R.R.	SMF	DV			12	12
Step By Step, Inc.	13th Street	SMF	DV			12	12
Third Street Alliance for Women & Children, Inc.	Third Street Alliance	FC		9	16		16
Turning Point of Lehigh Valley, Inc.	Starting Point	FC	DV	4	9		9
Victory House of Lehigh Valley	Victory House	SM				6	6
	TOTALS			73	189	115	304

(1) Provider Organizations	(2) Prevention					(3) Outreach			(4) Supportive Services									
	Mortgage Assistance	Rental Assistance	Utilities Assistance	Counseling/Advocacy	Legal Assistance	Street Outreach	Mobile Clinic	Law Enforcement	Case Management	Life Skills	Alcohol & Drug Abuse	Mental Health Counseling	Healthcare	HIV/AIDS	Education	Employment	Child Care	Transportation
AIDSNET														X				
Allentown Rescue Mission									X	X								
Allentown School District – Homeless Childrens’ Initiative Project															X			
Alliance for Building Communities				X														
Allied Services												X						
ARC of Lehigh & Northampton Counties																X		
Ashland Regional Medical Center													X					
Barnes-Kasson Hospital and Health Ctrs.													X					
Barnes-Kasson WIC Site													X					
Bethesda Day Treatment Center Inc.											X	X						
Bethlehem Area Vocational-Technical School																X		
B-K Health Center Inc.											X	X	X					
CareerLink (WIA) in each County																X		
Catholic Social Services											X	X						
CCCS of Lehigh Valley	X			X														
Center City Ministries																X		
Center City Ministries (Northampton Cty)									X	X								
Center for Coordinated Social Services																X		
Center for Counseling Services Good Samaritan Healthplex											X							
Chase Family Home																	X	
Child Care Information Service (CCIS) in every County																	X	
Child Development, Inc.															X			
Clubhouse of Lehigh County												X						
Community Action Committee of Lehigh Valley				X					X	X								
Community Psychological Center Inc.											X	X						
Community Service Foundation Inc. Buxmont Academy/Bethlehem											X							

(1)	(2) Prevention					(3) Outreach			(4) Supportive Services									
	Mortgage Assistance	Rental Assistance	Utilities Assistance	Counseling/Advocacy	Legal Assistance	Street Outreach	Mobile Clinic	Law Enforcement	Case Management	Life Skills	Alcohol & Drug Abuse	Mental Health Counseling	Healthcare	HIV/AIDS	Education	Employment	Child Care	Transportation
Provider Organizations																		
Community Services for Children															X			
Council of Spanish Speaking Organizations of Lehigh Valley																X		
Council on Alcohol and Drug Abuse											X							
County Assistance Offices – Emergency Shelter Allowance (at least one office in each County)		X																
County Assistance Offices – LIHEAP (at least one office in each County)			X															
County Sheriff's Office – (all counties)								X										
Dept. of Lehigh County Employment & Training Program																X		
Developmental Education Services																	X	
Easton Area Neighborhood Centers, Inc.	X	X	X						X	X								
Easton Hospital													X					
Emergency Food and Shelter Program Board (aka, FEMA Board one in each County, or groups of counties)	X		X															
Families First			X															
Gnaden Huetten Memorial Hospital													X					
Good Samaritan Counseling Center Good Samaritan Health Center/North											X							
Good Shepherd Rehab													X					
Good Shepherd SAVES Program																X		
Hallstead Medical Center													X					
Harbor Counseling											X							
Head Start of the Lehigh Valley															X		X	
Hispanic American Organization	X	X	X															
Hogar Crea Womens Center											X	X						
Jewish Community Center																	X	
Keystone Learning Center																X		
KIDZstuff																	X	

(1)	(2) Prevention					(3) Outreach			(4) Supportive Services									
	Mortgage Assistance	Rental Assistance	Utilities Assistance	Counseling/Advocacy	Legal Assistance	Street Outreach	Mobile Clinic	Law Enforcement	Case Management	Life Skills	Alcohol & Drug Abuse	Mental Health Counseling	Healthcare	HIV/AIDS	Education	Employment	Child Care	Transportation
Provider Organizations																		
LANTA METRO																		X
LANTA METRO PLUS																		X
Laurel Health Center													X					
LCCC Adult Literacy and Job Training Program															X	X		
Lehigh Co. Conference of Churches						X			X							X		
Lehigh County Drug and Alcohol Services						X					X							
Lehigh County Housing Authority									X	X								
Lehigh County Public Welfare																X		
Lehigh Valley Child Care																	X	
Lehigh Valley Hospital													X					
Lehigh-Private Industry Council																X		
Lenox Health Center													X					
Lifepath Work Center																X		
Livengrin Counseling Center											X							
Martha Lloyd																X		
Mental Health Associates and New Leaf Recovery Services of North Central PA											X	X						
Midpenn Legal Services					X													
Neighborhood Housing Services of the Lehigh Valley				X														
New Bethany Ministries									X	X								
New Directions Treatment Services											X							
New Hope Clubhouse												X						
New Milford Health Center													X					
North Central District AIDS Coalition														X				
Office of Vocational Rehabilitation (OVR) in each County																X		
Palmerton Hospital													X					
Pathways/Lehigh Co. Conference of Churches	X	X	X															
Penn York Serve Inc.																X		
PIC of Lehigh Valley, Inc.																X		

(1)	(2) Prevention					(3) Outreach			(4) Supportive Services									
	Mortgage Assistance	Rental Assistance	Utilities Assistance	Counseling/Advocacy	Legal Assistance	Street Outreach	Mobile Clinic	Law Enforcement	Case Management	Life Skills	Alcohol & Drug Abuse	Mental Health Counseling	Healthcare	HIV/AIDS	Education	Employment	Child Care	Transportation
Provider Organizations																		
REDCO-Turning Point																X		
Robert Packer Hospital													X					
Sacred Heart Hospital													X					
Saint Lukes Health Network													X					
Sayre Child Center																	X	
Shiloh Community Services, Inc.				X														
South Bethlehem Neighborhood Center																X		
Step By Step, Inc.									X	X	X	X						
The Greenhouse Center												X						
The Main Link												X						
The Program for Women & Families, Inc.									X	X								
The Salvation Army	X	X	X						X	X								
Third Street Alliance for Women & Children, Inc.									X	X							X	
Tink & Peg's Place Evergreen Halfway House											X							
Treatment Trends Inc. Confront Program											X							
Treatment Trends Inc. Keenan House											X							
Troy Community Hospital													X					
Turning Point of Lehigh Valley									X	X								
Twin Rivers Clubhouse												X						
Tyler Memorial Hospital													X					
United Christian Ministries, Inc.									X	X								
Unity House of Bethlehem												X						
Valley Youth House						X			X	X								
VAST																		X
VIA																X		
Victory House of Lehigh Valley									X	X								
Work/Life Center (Northampton Community College)																X		

Homeless Strategic Plan (91.215 (c))

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

5 Year Homeless Strategic Plan response:

1. Homelessness – Priority Needs

Lehigh County is part of the larger Lehigh Valley and also the NE Regional Advisory Board on issues pertaining to homelessness. Through participation in larger regional efforts, Lehigh County can more effectively address the needs of homeless individuals and families.

- A. Homelessness prevention
- B. Outreach/Assessment
- C. Emergency services
- D. Transitional Housing
- E. Permanent Supportive Housing

The priority needs outlined in the Continuum of Care strategy place high priority on Transitional housing for individuals and Permanent Supportive Housing for Families and Individuals.

2. Chronic Homeless Strategy.

The NE Regional Housing Advisory Board (RHAB) identified its priorities for addressing the needs of chronic homeless individuals and others:

1. To prevent homelessness through maximum use of mainstream resources and effective case management
2. To prevent homelessness through effective discharge planning from publicly funded institutions
3. To expand the capacity of local housing and service providers in rural areas to serve the chronically homeless
4. To expand permanent supportive housing for the chronically homeless
5. To develop resources for supportive services to supplement mainstream services

These goals have been adopted throughout the Northeast Region as a means to address homelessness. As stated above, the unmet need for Permanent Housing beds for individuals, of which 47 should be reserved for persons who are chronically homeless.

The First Lady's Commission to End Chronic Homelessness, in Allentown's Plan to End Chronic Homelessness identified strategies related to Prevention, Intervention and Organizational Infrastructure. Intervention is the means by which individuals will be connected to housing and assisted in remaining in housing. The plan calls for the creation of 10 additional permanent supportive housing per year which will yield 150 units in ten years. Another strategy is to utilize available housing options by providing support mechanisms. The plan also calls for a more regional approach to the problem.

Lehigh County will support these plans and strategies put forth by the two groups.

3. Homelessness Prevention

Lehigh County will continue to provide an array of social services that prevent homelessness. The County administers the TANF, GA, Medicaid, SCHIP, food stamp, and MH and DA referrals. Children and Youth services and the public assistance office offer a range of services designed to stabilize family situations and prevent homelessness.

4. Institutional Structure

The homeless strategy is carried out through the efforts of the NE Regional Advisory Board and the Community Action Committee of the Lehigh Valley. For McKinney Funds, the NE RHAB provides the leadership in preparation of the application. This is a very inclusive body composed of representatives of all sectors of the 12 County area.

At the more local area, in the Lehigh Valley, CACLV has been the convener of meetings and provided leadership on issues pertaining to homelessness. Most recently, the Allentown First Lady has spearheaded chronic homeless planning

5. Discharge Coordination Policy

County agencies are working closely with the NE RHAB to finalize protocols for discharge planning. Discharging persons who have been institutionalized to McKinney funded facilities is recognized as an unacceptable discharge plan. Formalizing plans with Foster care and medical institutions must still be completed. The state has taken the initiative to ensure compliance with the McKinney protocols.

Emergency Shelter Grants (ESG)

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

5 Year Strategic Plan ESG response: n/a

COMMUNITY DEVELOPMENT

Community Development (91.215 (e))

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

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

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

5 Year Strategic Plan Community Development response:

The two primary objectives developed by HUD to be addressed in the Community Development sections are:

- Creating Suitable Living Environments
- Creating Economic Opportunities

Each objective will have either of the following outcomes:

- Improve Availability/Accessibility
- Improve Sustainability

1. Identification of Non-Housing Community Development Needs

Owing to the diverse nature of Lehigh County communities, the non-housing community development needs within the County are varied and disparate, but there are some common elements. There are needs for public infrastructure reconstruction and public facility improvements in much of the County. There are significant Social Service needs that are not adequately addressed.

As in many rural areas throughout the country, public transit is lacking making transportation for those without cars a significant problem. There are economic development needs though given total CDBG resources and competing demands; only a limited number of projects can be tackled. Beyond these broad categories there are specific needs within communities such as downtown revitalization, sewer system improvements, flood protection, and roadway and sidewalk improvements.

The non-housing community development priorities for 2007-2011 are:

A) Public Facilities and Infrastructure

- Downtown revitalization
- Clearance and Demolition
- Sewer, water improvements
- Sidewalk improvements, including handicap accessibility
- Street improvements
- Facilities for abused and neglected women and children
- Child Care Centers

B) Economic Development

- Business assistance to promote “living wage jobs”
- Micro loan program
- Façade improvements/downtown revitalization

C) Public Services

- Childcare and after school care
- Homeless services
- Access to transit

These priorities are those the County and participating municipalities expect to address during the next five years using resources from the Community Development Block Grant program as well as other resources as available.

2. Basis for Assigning Priority

Priorities for community development were established from citizen input and a variety of consultations, meetings and ultimately adopted by the County Executive. While priorities can be generally established for the overall program, individual communities may have specific projects and programs identified as critical only to them. The priority list serves as a general guide to decision-making, not a rule. A multitude of factors determine the funding of individual projects including readiness and number/concentration of low/moderate person served. The priority identification plays an important but not absolute role in project selection.

Highest Priority activities include eligible CDBG projects that will create an impact on the community. Projects that stimulate the redevelopment of the community, enhance the quality of life and expand housing choice will be considered high priority.

Medium Priority activities are those projects that are meet critical local municipal needs for infrastructure and community services.

Low Priority is given to eligible activities that meet local needs but are deemed to have little impact on the quality of life of the community.

Most infrastructure and public facility projects will be constructed in eligible areas of low mod concentration.

3. Obstacles to Meeting Underserved Needs

The principle obstacle to meet underserved needs is financial. The allocation of federal funds, while significant, is well below levels required to meet the needs of the region's low/moderate income households and communities.

4. Short-term & Long-term Community Development Objectives

The following charts, HUD Table 2-B, identifies potential CDBG funded Community Development activities and the priority assigned. High priority activities will be funded, medium priority activities will be addressed if funds permit and low priority activities will not be funded. Planning and program administration activities are not included in the chart.

Public Facilities and Infrastructure County

IDIS Activity	Priority	Goal Unit (no. units)	Goal Unit (measures)
03 Public Facilities and Improvements	L	0	
03A Senior Centers	L	0	
03B Handicapped Centers	L	0	
03C Homeless Facilities	L	0	
03D Youth Centers	M	2	renovations/expansion
03E Neighborhood Facilities	M	1	improvements
03F Parks, Recreation Facilities	M	1	improvements
03G Parking	M	2	new/expansion/improvements
03H Solid Waste Facilities	L	0	
03I Flood Drain Improvements	M	2	community projects
03J Water/Sewer Improvements	H → M	10	community projects
03K Street Improvements	H	8	improvement projects
03L Sidewalks	H	4	community projects
03M ChildCare Centers	H	2	new/expansion/improvements
03N Tree Planting	L	0	
03O Fire Stations/Equipment	M	2	purchase assistance
03P Health Facilities	M	3	satellite centers
03Q Abused & Neglected Children Facilities	H	1	new/expansion
03R Asbestos Removal	M	2	site ready
04 Clearance and Demolition ML Project	H	4	cleared lots
10 Removal of Architectural Barriers (curb cuts)	M	6	community projects
18A ED Financial Assistance to For-Profits	L	0	
18B ED Technical Assistance	M	1	Organization
18C ED Micro-Enterprise Assistance	H	4	Small Business

Economic Development

The focus of economic development activities will be downtown revitalization and assistance to employers providing living wages and appropriate benefits.

07A Land Acquisition	H	1	Parking
17B Infrastructure Development	H	2	Site
17C Building Acquisition, Construction	H	2	Site
17D Other, Commercial, Industrial Improvements	H	8	Community projects

Antipoverty Strategy (91.215 (h))

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

5 Year Strategic Plan Antipoverty Strategy response:

Poverty is a function of income, which is related to education, job training and employment. Lehigh County remains committed to addressing the needs of its citizens who live at or below the poverty level. It is also recognized that the presence of poverty and the related social and economic problems are a destabilizing element in some communities.

In Lehigh County, Community Action Committee of the Lehigh Valley (CACLTV) is the official anti-poverty agency. CACLTV provides rent and utility assistance, case management and counseling services to assist with financial management and benefit entitlement assistance, home weatherization to reduce utility costs, furniture and household goods, alcohol and mental health counseling, a Family Savings Account Program, child care, transportation to work for up to six months and assistance in purchasing a dependable vehicle, and other varied programs that empower low income households assisting them to develop skills for independent living. In support of employment opportunities, CACLTV provides the following programs.

- The Rising Tide Loan Fund Program provides micro-loans of up to \$25,000 for start-up and expanding businesses. Start-up businesses may receive technical services through the “Start Your Business” training program.
- The Supported Work Program (SWP) is a six-month program designed to assist individuals moving from welfare to work. It focuses on those with less than a ninth-grade education and teaches the skills necessary in finding and keeping a job. The population served includes adults receiving Temporary Assistance to Needy Families (TANF) and persons who are eligible for Food Stamps only. This population requires assistance with job readiness skills, developing resumes, determining career goals, finding jobs, speaking and writing English, making child care arrangements, solving transportation problems and possibly including learning how to drive.

Participants in the CACLTV Supported Work Program receive intensive case management, employability skills training, job placement, and support once employment is secured. Topics covered in the employability classes include: completing job applications, identifying employment opportunities, identifying barriers to employment, overcoming employment barriers, basic computer keyboarding, practicing job interviews, and developing long-term career plans.

- The Fowler Community Technology Center offers a variety of computer classes to help Lehigh Valley residents bridge the digital divide. The heart of the Center’s work is giving students a broader experience of technology that goes beyond the conventional school classroom. Through the use of creativity and play, students will grow in their skills and begin to understand the practical application of skills they have mastered. Included in the current curriculum are Lego robotics, graphic design, digital video and photography.

Lehigh County will provide CDBG funds to public service agencies to assist households below the poverty level with services and program support. The County will work with service providers to pursue resources and innovative partnerships to support the development of affordable housing, homelessness prevention, and emergency food and shelter.

To assist with economic development in support of job creation, Lehigh County administers various initiatives and agencies in support of economic development.

- The Lehigh County Department of Community and Economic Development (DCED) works with the Lehigh Valley Chamber of Commerce through the Borough Business Revitalization Program (BBRP) to provide economic development services to the Lehigh Valley's small towns. The BBRP mobilizes volunteers and partners in the public and private sectors to target investment and development into the Lehigh Valley's smaller urban cores and central business districts.
- Lehigh County works in conjunction with Lehigh Valley Economic Development Corporation (LVEDC), community organizations, other economic development groups and the Workforce Investment Board to help enhance programs and create opportunities in the County.
- Lehigh County Economic Development Corporation (LVEDC) is able to provide manufacturing, industrial, and nonprofit organizations with low interest financing generated through tax exempt revenue bonds.
- Lehigh County CareerLink offers job search counseling, skills assessment programs, GED courses, information on training programs and workshops on many subjects, including resume writing and interview skills. Considered a one-stop location for all employment needs, CareerLink offers a multi-faceted approach to the job market. . Specialized services for mature workers, youth, people with disabilities, veterans, dislocated workers and cash assistance recipients are available at CareerLink.

Job creation and economic growth is increasing becoming linked through Workforce Housing awareness. Options for expanding housing opportunities in closer proximity to jobs and reducing the transportation burden or creating new jobs in areas closer to the housing centers in the County are being explored.

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

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

5 Year Strategic Plan LIHTC Coordination response: N/A



NON-HOMELESS SPECIAL NEEDS

Specific Special Needs Objectives (91.215)

- | |
|--|
| <ol style="list-style-type: none">1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan. |
|--|

5 Year Non-homeless Special Needs Analysis response:

1. Priorities and Objectives:

Increase housing facilities and services — private, non-profit developers, especially CHDOs, will leverage other public and private funding to develop transitional housing and supportive housing services.

During the next five years, the County will work with housing provider agencies to develop housing for lower income families and individuals, including persons with special needs.

As described in that Needs Assessment, there exists the need to develop permanent supportive housing for populations with special needs. The need for supportive housing for the mentally disabled was stressed during the consultation participation process. Persons with mental illness are disproportionately represented among persons who are homeless.

The Lehigh County Mental Health Program supports the Local Housing Options Team (LHOT). The LHOT is working on the development of a Fairweather Lodge. The conceptual design of this program is to provide group living space for 6 to 8 individuals with employment through development of a communal business venture. The model fosters independence and self-sufficiency in a safe, supportive environment for persons with serious mental illness.

VIA proposes development of homeownership opportunities for persons with Mental Retardation by partnering with Habitat for Humanity to provide 8 to 10 units over the next five years.

2. Resources

The County has established as a priority objective to create new permanent supportive housing for persons who are mental ill. The County will support the actions of the Department of Human Services, Mental Health Program to develop housing for persons with mental illness using the Health Choices Reinvestment funds.

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

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

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

5 Year Non-homeless Special Needs Analysis response:

Persons with special needs include the Frail Elderly, Persons with Disabilities, Persons with Mental Illness, Persons with Mental Retardation, Persons with Substance Abuse problems and Persons with HIV/AIDS. The portion of the population requiring special housing options has not been quantified. Many persons with such special needs also have very low incomes. Therefore, their needs may have already been taken into account in estimating the needs of persons with very low incomes. However, for some people, supportive housing – housing with supportive services – is needed as they are unable to undertake the Activities of Daily Living (ADL) without assistance. When family is not available and in-home care is not sufficient, different housing options are needed.

In the Lehigh Valley, housing options exist but on a limited basis. For persons in Lehigh County, there are:

- o Personal Care Boarding Homes/Assisted Living Facilities: Facilities that provide Assistance with Daily Living Skills, serves older adults and adults with mental illness.
 - 26 facilities with 1,895 beds

- 12 beds with Enhanced personal care specifically for persons with Mental illness (ACORN – note: will increase to 16 beds in 2007)
- o Nursing Homes: Facilities that provide medical attention as well as ADL, also generally elderly clientele but also those with severe physical disabilities and mental incapacitation
 - 16 facilities with 2,752 beds

In addition, special housing programs have been established for persons with mental illness:

- * SBS Young Adult (18-24 years) 4 units
- * Salisbury House – transitional living young adults 6 units
- * Supported living – max care 11 units
- TLC CRR max care – 10 units
- TLC CRR Mod care – 28 units
- * SBS Supported Housing 10 units (bi-County)
- * SBS Managed Residence 11 units (bi-County)
- * PCBH Supports 10 units (bi-County)
- SBS Supportive Living 60 units
- PATH – 147 clients

** Denotes CHIPP Funding –Community Hospital Integration Projects Program, keyed to number of beds closed at state hospitals*

The Lehigh County Mental Health Office, in its annual plan noted that the number of total active clients through Outpatient Clinical care in 2006-2007 was 2,010 adults. It is not known what portion of these adults require supportive housing but at least 100 people are on waiting lists for housing supports.

Although determined to be a long-term need in the community, the state does not allow the County to plan for Long-term Structured Residences (LTSR) unless there is a state hospital closure. Such facilities would house persons for whom independent living is not possible as they require 24/7 care and a secure environment.

At this time, Lehigh County, in cooperation with the State Hospital, is required to evaluate all consumers who have been hospitalized at state hospitals for two or more years. The purpose of this evaluation is to determine the least restrictive living arrangement appropriate for each consumer. Lehigh County has 68 consumers in the process of being evaluated. The process includes a Consumer to Consumer assessment which is completed by the Lehigh Valley Consumer/Family Satisfaction Team, a Family to Family assessment completed by Lehigh Valley NAMI, and a clinical assessment completed by state hospital and County staff. Upon completion, the consumer attends a Community Support Plan meeting with reps from the state hospital, County and community staff, consumer advocate and family. A plan is developed to identify what services are necessary to serve this consumer in the community. Lehigh County is scheduled to complete this process in March of 2007.

The types of housing and supportive living services needed as stated in Lehigh County's Plan include:

- Young adult CRR, 6-8 beds
- All inclusive residential – higher level of staff component 24/7; add to current inventory of 2 sites with 6 in each to create 2 more sites.

- 2- 6 unit apartment buildings near the Allentown clubhouse to provide a more peer-supported living environment with services.

The 2007 Health Choices Reinvestment Plan is more open-ended and indicates housing initiatives will be undertaken as specified by the consumer-oriented planning group.

The Lehigh County Mental Health Offices supports the Local Housing Options Team (LHOT). The LHOT is working on the development of a Fairweather Lodge. The conceptual design of this program is to provide group living space for 6 to 8 individuals with employment through development of a communal business venture. The model fosters independence and self-sufficiency in a safe, supportive environment for persons with serious mental illness.

Housing Opportunities for People with AIDS (HOPWA)

5 Year Strategic Plan HOPWA response: N/A

Specific HOPWA Objectives

- | |
|---|
| <ol style="list-style-type: none">1. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan. |
|---|

5 Year Specific HOPWA Objectives response: N/A

OTHER NARRATIVE

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

First Program Year Action Plan FY 2007

Narrative Responses

GENERAL

Executive Summary

Program Year 1 Annual Plan Executive Summary:

A. Purpose of Annual Plan

The purpose of a Five Year Strategic Plan is to identify housing and community development needs while the Annual Plan is to develop specific goals and objectives to address these needs for the coming one-year period (FY 2007). This document is part of the first Five-Year Strategic Plan for Lehigh County and covers the period of October 1, 2007, until September 30, 2008. The Strategic Plan and this Annual Plan allow the County to receive federal housing and community development funds and must be submitted to the U.S. Department of Housing and Urban Development (HUD) by August 15, 2007.

The FY 2007-2012 Strategic Plan informed HUD how Lehigh County intends to use federal and non-federal resources to meet community needs. In Lehigh County's case, the primary funding source is HUD's Community Development Block Grant (CDBG) Program. CDBG funds are authorized under Title I of the Housing and Community Development Act of 1974, as amended. The funds are intended to provide lower and moderate-income households with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration. As an entitlement community, Lehigh County receives an annual share of federal CDBG funds. In order to receive its CDBG entitlement, Lehigh County must submit an Annual Plan to HUD. The Fiscal Year 2007 Annual Plan includes the funding application for CDBG and information on proposed projects.

B. Citizen Participation

Lehigh County engaged local communities, the public and human services agencies in the preparation of the Five Year Plan. A public hearing was held to receive input regarding priority needs that should be addressed during the upcoming years. Information was disseminated concerning the preparation of funding requests for the FY 2007 Annual Plan. Applications for municipal improvement projects were distributed to all municipalities on two occasions. In late fall 2006, the County distributed funding requests under the assumption that participation in the small communities process would continue. When the County was granted HUD entitlement status, a second funding request with revised low-mod area criteria was distributed. A technical assistance/needs hearing was held on May 8, 2007. Technical assistance was provided to assist in the submission of requests for CDBG eligible projects. As part of the citizen participation process, copies of the draft Annual Plan were made available for citizens during a 30-day comment period (June 22, to July 23, 2007) and after the Plan's completion. A second public hearing is scheduled for July 10, 2007.

C. General Goals

Leigh County's Strategic Plan represents a vision for housing and community development. Included in the 2007-2011 Five Year Plan are the County's goals, needs, strategies and resources to address those needs and specific projects. The general goals around which the Plan was written include:

- provision of decent, affordable housing,
- provision of a suitable living environment,
- expansion of economic opportunities,
- increase homeownership, and
- end chronic homelessness.

D. Resources

The Five Year Strategic Plan includes this First Year Annual Plan for spending \$1,432,485 from the CDBG Program. The overall plan for FY 2007 provides funds for housing rehabilitation, social services, public facilities, infrastructure, economic development, and general administration.

Additional federal resources that the County expects to have available include the funds the Lehigh County Housing Authority expects to receive for the Public Housing Capital Fund Program of \$316,958, Public Housing operating funds and Section 8 Housing Voucher assistance.

E. Housing and Community Development Needs

1. Housing Needs

- **Retain existing housing stock** — rehabilitation assistance is needed for both owner and renter occupied housing.
- **Development of additional affordable housing** — housing to be developed by private investment (rent and own) and non-profit organizations.
- **Development of special needs housing** — utilize CHDOs and nonprofit organizations to provide financial and technical assistance in developing housing facilities for the homeless and supportive housing units for persons with special needs.
- **Homebuyer's assistance** — down payment and closing cost assistance for low and moderate-income homebuyers.

2. Community Development Needs

- **Public services** — wide range of public services, especially for the homeless and to prevent homelessness and expand housing choice for special needs populations.
- **Public facilities/infrastructure improvements** — leverage local funding for facilities for youth, downtown business districts, sidewalk, street, water, sewer and drainage improvements.

3. Homeless and Special Needs

- **Increase housing facilities and services** — private, non-profit developers, especially CHDOs, will leverage other public and private funding to develop transitional housing and supportive housing services.

- **Improve coordination and communications among housing and supportive services providers** — encourage the increase in communication and information sharing among agencies.

4. Public and Assisted Housing Needs

- Rental subsidies through Section 8 and family self-sufficiency.
- Modernization of existing units.
- Additional resident services to encourage independent living.

There are a total of 289 public housing units operated by the Lehigh County public housing authority in the County, outside the cities of Allentown and Bethlehem. All units are in good condition. In addition, the Housing Authority administers 1652 Section 8 Vouchers.

There are many other types of assisted housing available in the County which have been financed through State and Federal programs.

5. Economic Development

Leverage private financing to encourage the location and expansion of business and industry to create employment opportunities for low and moderate-income residents, provide revitalization in low income central business districts, including façade improvements, streetscape, infrastructure and demolition.

F. Barriers to Affordable Housing

As detailed in the Five-Year Plan, there are several barriers to affordable housing:

- High cost of land, specifically undeveloped land.
- Difficulty in finding land.
- Inadequate supply of development sites in general.
- Insufficient supply of land zoned for multi-family housing.
- Relocation and demolition costs in projects involving land assembly.
- The NIMBY (“Not in My Back Yard”) response.
- In distressed areas, achievable rents are too low to meet operating expenses, thereby making some projects infeasible to finance or require high subsidies.
- The increasing costs of ongoing property management such as real estate taxes, insurance, management and maintenance, which make it difficult for developers to offer quality management services, thereby making smaller projects less viable.
- The cost of lead-based paint abatement is significantly increasing the rehabilitation cost of older housing units, and subsequently, causing a decrease in the number of housing units rehabilitated.
- Non-profit developers having an inadequate supply of capital to meet predevelopment expenses severely limits their ability to explore the feasibility of potential projects as prospects arise.
- Total development costs are greater than achievable sales price for homeownership projects. As a result, the actual cost of developing housing can be twice as high as the sales price of affordable units to lower income households.
- In high growth areas, market rate projects offer higher profit margins to builders and developers thereby reducing the supply of labor and number of firms interested in affordable housing.
- Market rate transactions on owner-occupied dwellings offer fewer challenges and higher commissions to Realtors.

- Continuously shrinking state and federal funding sources to subsidize affordable housing projects.

G. Anti-Poverty Strategy

There are two primary means by which local officials hope to reduce the number of households with incomes below the poverty line — educate and train individuals and increase the number of employment opportunities. Lehigh County continues to be committed to these goals.

H. Strategic Plan

The Five-Year Strategic Plan outlines a long-term strategy to deal with the identified housing and community development needs. Projects and programs will be coordinated to increase their benefit to lower income households. These actions, projects and programs reflect priorities determined through the local housing studies, public participation, municipal funding requests and the Department of Housing and Community Development.

Housing activities will conserve the existing affordable housing stock and also encourage new construction and homebuyer assistance. Renter-occupied housing needs additional subsidies and rehabilitation opportunities. Public service agencies will be assisted in order to assist special needs populations and persons at-risk of becoming homeless. Infrastructure and public facilities programs will provide community wide facilities to improve the quality of life. Providing economic opportunity to residents (jobs) and businesses (facades, financial assistance) is the key to reducing poverty and elevating the income levels of the population.

I. Housing and Community Development Priorities

1. Housing

- Preservation of the existing affordable housing stock in residential neighborhoods.
- Development of additional affordable housing, especially with non-profit organizations.
- Increase homeownership for lower income households through homebuyer assistance and new construction.
- The development of additional special needs housing.
- Continued modernization of public housing units and development of resident services.

2. Homeless

- Increase permanent supportive and transitional housing and services for homeless and special needs populations.
- Improve coordination and communication among homeless and supportive service providers.
- Work toward ending chronic homelessness.

3. Non-Housing Community Development Priorities

- Provide financial support for public services that prevent homelessness and meet emergency housing needs; expand housing choice for persons with disabilities.
- Provide financial assistance and technical support for public facility and infrastructure improvements.
- Foster local economic development and downtown revitalization.

J. Objectives and Outcomes

Lehigh County utilizes HUD's Performance Measurement Plan that is included as a portion of the Monitoring narrative and specified in the Five Year CP. In 2007, the funded activities will have the following results:

- The County's housing rehabilitation program will assist 20 homeowners with rehabilitation to meet *Affordability for the purpose of providing decent affordable housing*.
- Public service activities will address *Sustainability for the purpose of creating suitable living environments*.
- The Borough of Coopersburg will undertake sewer improvements designed to address *sustainability for the purpose of creating suitable living environments*.
- The Borough of Alburtis will undertake sidewalk improvements designed to address *sustainability for the purpose of creating suitable living environments*.
- The Boroughs of Coplay and Emmaus and Whitehall Township will undertake handicap modifications designed to address *accessibility for the purpose of creating suitable living environments*.
- Catasqua Borough will provide access to a new parking facility in a low-mod income neighborhood *for the purpose of creating a suitable living environment*.
- The Boroughs of Fountain Hill and Slatington will undertake storm drainage projects designed to address *access for the purpose of creating suitable living environments*.
- The County will provide design assistance for façade improvements in targeted downtown areas to address *sustainability for the purpose of creating suitable living environments*.
- The County will make economic development assistance available to private entrepreneurs seeking to expand businesses or start new business and employ lower income residents to *provide access to new jobs and create economic opportunity*.

K. Year 2007 Annual Plan

The Year 2007 Annual Plan for Lehigh County will include \$1,432,485 in FY 2007 CDBG funds. The 2007 Annual Plan provides \$118,008 in social services, an owner-occupied housing rehabilitation program with CDBG funds of \$200,000 plus \$200,000 from the Affordable Housing Trust Fund, \$702,780 in funding for 9 municipal projects for infrastructure improvement and \$25,200 for façade improvement design and \$100,000 for an Economic Development Revolving Loan Fund. Funds budgeted for general administration, \$286,497, include planning activities in Emmaus Borough and to fund a Housing Coordinator position to expand housing opportunities.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

Program Year 1 Annual Plan General Questions response:

The funding allocations for municipal projects for FY 2007 are targeted within lower income neighborhoods. Public services target lower income persons within larger geographic areas. See map on following page.

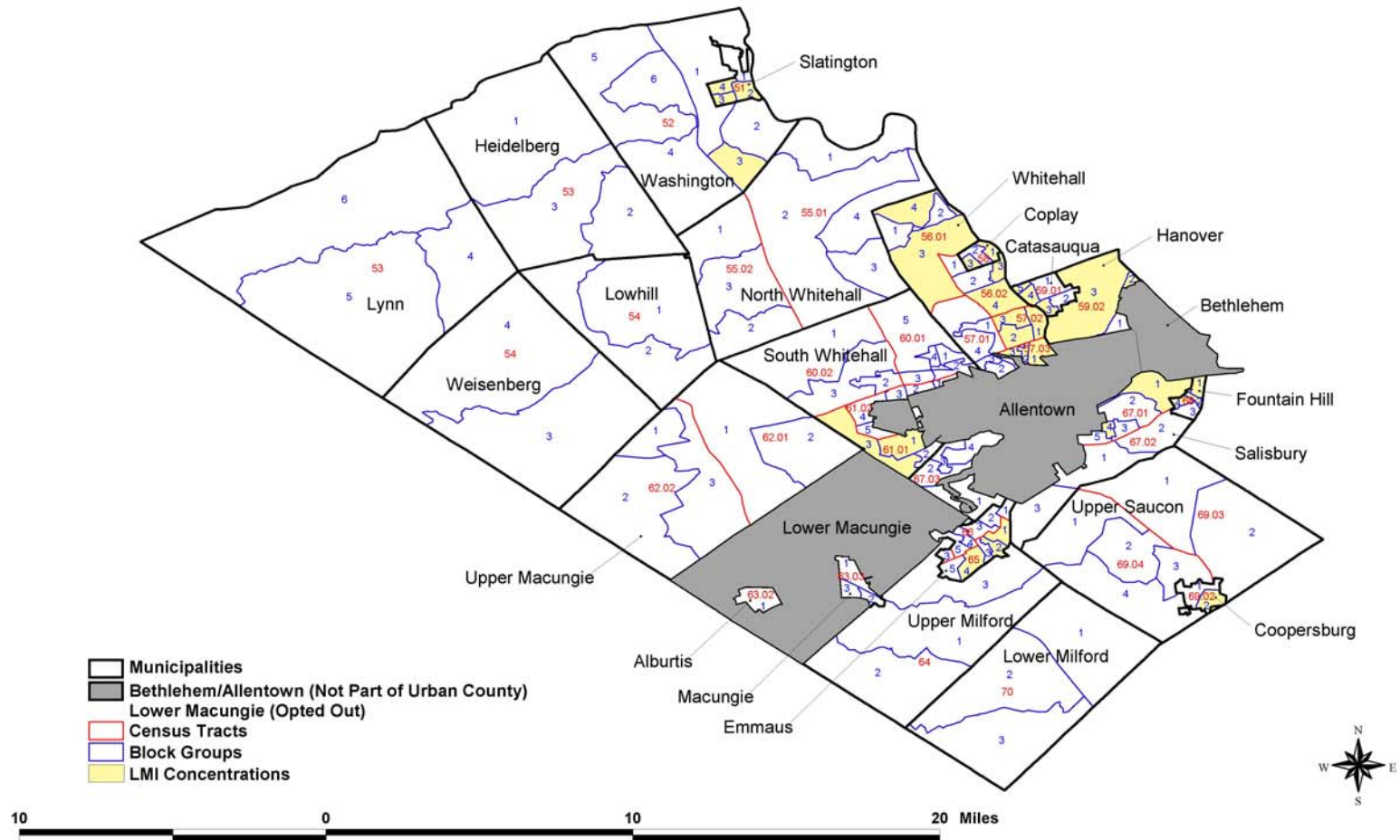
The system for establishing the priority for the selection of these projects is predicated upon the following criteria:

- 1) Meeting the statutory requirements of the CDBG program;
- 2) Meeting the needs of very-low, low- and moderate-income residents;
- 3) Focus on low- and moderate-income areas or neighborhoods;
- 4) Coordination and leveraging of resources;
- 5) Response to expressed needs;
- 6) Sustainability and/or long-term impact; and
- 7) The ability to measure or demonstrate progress and success

All projects meet the HUD criteria for selection and will benefit low and moderate income households in those census tracts or block groups that are defined as low/mod areas. In selecting projects, attention is paid to concentrations of racial or ethnic groups and disproportionate needs standards.

We do not anticipate any obstacles in the performance of these activities. Affordable housing was identified as the largest underserved need in Lehigh County in the Five Year Strategic Plan. Lehigh County was not made a HUD entitlement community under the HOME program. Therefore, resources are limited. By funding a Housing Coordinator position, we expect to be better able to identify emerging opportunities to address housing issues and to coordinate resources.

Lehigh County



Managing the Process

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

Program Year 1 Annual Plan Managing the Process response:

The Department of Community and Economic Development of Lehigh County is the designated Lead Agency for the preparation, submission, implementation, and monitoring of this Annual Plan, which covers the period October 1, 2007 to September 30, 2008. The Department of Housing and Community Development has had the responsibility of administering both the Community Development Block Grant (CDBG) Program under the Pennsylvania Small Communities Program. The staff has expertise in the requirements and regulations of the CDBG program, with the overall goal of improving the quality of life of our lower income residents. Daily implementation, budget allocation, reporting and monitoring are the responsibility of the Community Development staff.

The County recognizes that the preparation of the Annual Plan requires discussion and consultation with all participating municipalities and many diverse groups, organizations, and agencies. During preparation of the Five Year Plan this year, the work of several study groups was utilized as the basis of determining housing needs and needs of special populations. There was consultation with local officials, the Lehigh County Housing Authority, County departments, human services providers, domestic violence and Continuum of Care representatives.

The local municipalities and various County departments were also consulted for input on community development needs. Applications were distributed to all municipalities for submission of projects seeking CDBG funding. As the County had been preparing for a submission under the Pennsylvania Small Communities Program, municipalities had two opportunities to consider projects for FY 2007. When Lehigh County learned of its entitlement status in the Fall 2006, the small communities process was already underway. A second solicitation to communities and organizations was done in the winter, 2007 and included additional census areas made eligible by the exception level criteria employed under the HUD entitlement program.

The Lehigh County public housing authority provided input to the planning process. Representatives provided information regarding public housing stock and conditions, needs, program results and resources. Both the Strategic Plan and this Annual Plan have incorporated information from the Agency Plan. A copy of the Capital Fund Program tables that outlines the use of funds by the Lehigh County Housing Authority is provided in the appendix to this document.

Also, as described below, the County has sought citizen participation and made all materials readily available to the public for review and comment.

Citizen Participation

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

Program Year 1 Action Plan Citizen Participation response:

The Five Year Strategic Plan and the 2007 Annual Plan resulted from a process of consultation and citizen participation. Local municipalities, citizens, not-for-profit organizations, and interested parties were afforded a variety of opportunities to participate in the process including:

- 1) Prepare applications for funding;
- 2) Participate in public meetings about needs;
- 3) Review the draft plan, and provide written comment about the plan; and
- 4) Participate in the public meetings to offer comments about the plan.

The County complied with the citizen participation requirements of the regulations by doing the following:

- Preparing, adopting and following a Citizen Participation Plan;
- Publishing informational notices about the plan prior to public hearings on the plan;
- Holding two or more public meetings in accessible places at convenient times after providing reasonable notice;
- Publishing a summary of the Strategic Plan and the Annual Plan, describing its contents and purpose and a listing of locations where the entire plan could be examined;
- Making the Strategic Plan and the Annual Plan available for public examination and comment for a period of thirty (30) days before submission to HUD;
- Providing citizens, public agencies, and other interested parties reasonable access to records regarding any uses of any assistance for affordable and supportive housing that the County may have received during the preceding five years; and
- Considering the views and comments of citizens, and preparing a summary of those views for consideration with the Annual Plan submission.

The County actively sought public input in the course of developing this Annual Plan. As the lead agency for the Strategic Planning Process, the Department of Community and Economic Development made every effort to solicit public participation during the development of the Plan. During the planning process, two public hearings were held. To notify the public of the hearings, a public notice was published in the non-legal section of the *Morning Call*. Municipal officials in each community were notified of the meetings by mailings. The notices for the hearings were published at least one week prior to the scheduled hearing. There were no identifiable outlets for providing the information in other languages, nor significant non-English speaking population in Lehigh County outside the City.

A hearing was held on May 8, 2007 at the Lehigh County Government Center, Allentown. A hearing on the draft Annual Plan was held on July 10, 2007 at the same location.

This 2007 Annual Plan was available for public review and comment for thirty days from June 22, 2007 to July 24, 2007. A summary of the Annual Plan was published in the *Morning Call* on June 11, 2007 and posted on the County website.

All meetings were held in facilities that are ADA compliant, providing full access to all members of the public. As part of printed public notices, citizens are notified that comments will also be received by mail or telephone. The appropriate office hours and phone numbers are printed. All requests or comments received by mail are answered within 15 days of their receipt.

At the public hearings, information was disseminated on the CDBG program, anticipated levels of funding, and overall program requirements. The public was given the opportunity to suggest priority needs for housing and community development.

During the 30 day comment period, the County presented the 2007 Annual Plan to the Board of Commissioners for review and comments. The County Executive, as the chief elected official of the County, authorized the Annual Plan for submission to HUD.

The Annual Plan, both draft and final versions, were made available to the public. Citizens, public agencies, County departments and other interested parties had the opportunity to receive information, review and submit comments on any proposed submission. All documents were available during normal working hours in the County Community Development Office, various County libraries, in the Department offices and on the web.

Comments received from the public regarding the Annual Plan were recorded and made part of the public hearing records. In general, comments received may be summarized as follows:

- Public Hearing held on May 8, 2007 — discussion about the priorities and focus of effort of the County.
- Public Hearing held on July 10, 2007 — (TBD)
- Thirty (30) day comment period June 22, 2007 to July 24, 2007.

As previously stated, the proposed Annual Plan submission was published with the Five Year Strategic Plan in summary form so affected citizens had sufficient opportunity to review the documents and provide any comments. This notice was published on June 22, 2007. The comments received will be reviewed and considered in preparing the final Annual Plan submission. A summary of such comments will be included in the Plan.

Any comments not accepted and the reasons why these comments were not accepted will be inserted here.

Institutional Structure

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

Program Year 1 Action Plan Institutional Structure response:

Lehigh County will implement the Annual Plan through the efforts of the Department of Community and Economic Development. Cooperation and support from local municipal governments, and private, non profit, and for-profit organizations will be needed.

As a new entitlement, Lehigh County will need time to become involved in the full range of issues surrounding the implementation of the Strategic Plan. During FY 2007, a Housing Coordinator position will be created. With this position, possibly a bi-county effort with Northampton County, the County expects to be better able to identify emerging opportunities to address housing needs and to coordinate resources.

Additional staff will also be brought into the Department of Community and Economic Development. Such staff will be needed to administer the range of activities that have been included in this plan.

The County will issue an RFP to non-provide and for-profit housing providers to develop a delivery mechanism for a County-wide housing rehabilitation program. At present, the County does not have a program in place. The complexities of the housing rehabilitation program must be understood by whomever is vested with this responsibility.

The County will reach out to the local homeless shelter and transitional housing providers. Although Lehigh County is part of the Northeast Regional Housing Advisory Board, a more local approach to ending chronic homelessness is needed. The First Lady of Allentown has initiated a planning process that will require regional support.

Monitoring

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

Program Year 1 Action Plan Monitoring response:

Performance monitoring is an important component in the long-term success of the County's community development program. The County, through the Department of Community and Economic Development, will be responsible for developing standards and procedures for ensuring that the recipients of housing funds meet the purposes of the appropriate legislation and regulations, and that funds are disbursed in a timely fashion.

The Department of Housing and Community Development oversees the County's housing and community development programs, and will be responsible for all performance measurement activities. The monitoring requirements and procedures under the Strategic Plan and this Annual Plan will build upon existing monitoring systems and experience in administering federal and state programs and funds.

The Department's standards and procedures for monitoring are designed to ensure that:

- 1) Objectives of the National Affordable Housing Act are met;
- 2) Program activities are progressing in compliance with the specifications and schedule for each program; and
- 3) Recipients are in compliance with other applicable laws, implementing regulations, and with the requirements to affirmatively further fair housing and minimize displacement of low-income households.

Activities of subrecipient non-profit agencies will be closely monitored and will include review and approval of budgets, compliance with executed Grant Agreements, review and approval of vouchers, review of fiscal reports on a monthly basis, and a review of audits on an annual basis.

Monitoring will occur through on-site monitoring visits. These visits will occur as necessary, but will be conducted at least once a year. There are monitoring responsibilities that go beyond the time of completion of various activities. For Community Development public facilities and housing projects, site visits will be conducted at least every other year to assure benefit to low-income residents.

All sub-recipients must identify the personnel working on the project, keep accurate records and filing systems to document program benefits and compliance, maintain an appropriate financial management system, submit to an audit, and submit a final report as a closeout procedure.

Performance Measurement Plan

In accordance with HUD's Community Planning and Development Notice 03-09, the County, as part of this FY 2007 Program year submission, must develop a Performance Measurement System designed to measure both the productivity and impact of the Community Development Block Grant Program. In accordance with the HUD Training Manual and Guidebook Community Planning and Development Outcome Performance Measurement Framework, Lehigh County has developed the following:

For each activity the County is required to indicate the Objective and Outcome as per the new guidelines, these being:

Objectives:

- Creating Suitable Living Environments
- Providing Decent Affordable Housing
- Creating Economic Opportunities

Outcomes:

- Availability/ Accessibility
- Affordability
- Sustainability

The combination of these created an Outcome Statement for each activity. The Outcome Statement is also indicated on the individual Project Activity forms under Proposed Outcome. Additionally, the County has indicated the Specific Outcome Indicators that are required to be reported to HUD for each activity.

- The County's housing rehabilitation program will assist 20 homeowners with rehabilitation to meet *Affordability for the purpose of providing decent affordable housing*.
- Public service activities will address *Sustainability for the purpose of creating suitable living environments*.
- The Borough of Coopersburg will undertake sewer improvements designed to address *sustainability for the purpose of creating suitable living environments*.
- The Borough of Alburis will undertake sidewalk improvements designed to address *sustainability for the purpose of creating suitable living environments*.
- The Boroughs of Coplay and Emmaus and Whitehall Township will undertake handicap modifications designed to address *accessibility for the purpose of creating suitable living environments*.
- Catasqua Borough will provide access to a new parking facility in a low-mod income neighborhood *for the purpose of creating a suitable living environment*.
- The Boroughs of Fountain Hill and Slatington will undertake storm drainage projects designed to address *access for the purpose of creating suitable living environments*.
- The County will provide design assistance for façade improvements in targeted downtown areas to address *sustainability for the purpose of creating suitable living environments*.
- The County will make economic development assistance available to private entrepreneurs seeking to expand businesses or start new business and employ lower income residents to provide *access to new jobs and create economic opportunity*.

Lead-based Paint

- | |
|---|
| <ol style="list-style-type: none">1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families. |
|---|

Program Year 1 Action Plan Lead-based Paint response:

Lead-based paint poses a particular hazard to children under the age of six, and is the focus of efforts by HUD to raise awareness of the problem and mitigate or eliminate the hazard. Lead-based paint was banned in 1975, but housing constructed prior to that time typically contains lead-based paint to some degree.

Lead hazards will be addressed during housing rehabilitation efforts. All homes that receive rehabilitation assistance will be tested for the presence of lead-based paint. When evidence of the paint is found, surfaces are removed or the material is encapsulated to prevent exposure.

Lehigh County receives Childhood Lead Prevention Partnership funds from the state. As the CLPPP, the County has public health officials who do medical case management for all children who have elevated blood lead levels. Educational programs are directed at families with young children, particularly those from impoverished families.

HOUSING

Specific Housing Objectives

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

Program Year 1 Action Plan Specific Objectives response:

In response to the preceding analysis of needs, conditions and the housing market, the County has adopted the following Affordable Housing Strategies.

Housing Priorities and Activities

- **Priority: Preservation of the existing owner occupied affordable housing stock in residential neighborhoods.**

Goal: Assist 100 lower income households through FY 2011 through housing rehabilitation programs — assist 20 households in Year 1

Resources:

CDBG

HOME

Affordable Housing Trust Fund

Pennsylvania Housing Finance Agency - Repair and Renovate (R & R) Program

Proposed Activities: Owner Occupied Housing Rehabilitation Program

Description and Proposed Accomplishments - Owner-Occupied Rehabilitation: The County will initiate an owner-occupied Housing Rehabilitation Program, which provides financial assistance to low- and moderate-income homeowners. The financial assistance is provided for the repair or rehabilitation of substandard housing to meet local building code and Section 8 Housing Quality Standards, and to ensure safe and sanitary living conditions. \$200,000 will be made available in FY 2007 for this program and \$200,000 will be from Affordable Housing Trust Fund. The County anticipates that the rehabilitation of up to 20 units occupied by low- and moderate-income households of all sizes will be completed during the program year.

The County will also continue to work with local banks to leverage special financing packages for housing rehabilitation assistance, which will be targeted for moderate- income households who have greater ability to repay private loans. PHFA is providing loans through the R & R program to credit-worthy income eligible families.

Geographic Distribution: All funds will be distributed Countywide outside of the cities of Allentown and Bethlehem and Lower Macungie Township.

- **Priority: Preservation of Affordable Rental Housing**

Goal: Assist 200 rental units that are affordable to lower income households — no LCHA units in Year 1

Resources:

HOME
Capital Fund Program (Public Housing Units)
Affordable Housing Trust Fund
Financial institutions
Non-profit Organizations

Proposed Activities: none

Description and Proposed Accomplishments: Rehabilitation and modernization assistance is received by LCHA for public housing that it owns and operates. Should HOME funds become available to the County, financial assistance would be made available to housing owned by non-profit organizations that provide publicly assisted housing that is affordable to lower income households. Assistance could be used for major systems repairs, replacement of fixtures and infrastructure, weatherization improvements, and assistance with adaptive modifications and accessibility improvements.

Rents for units assisted by Lehigh County (including utilities or utility allowances) will be limited to HUD's published Fair Market Rent.

- Rehabilitation and modernization assistance for assisted rental housing will assist up to 100 households over the next five years. Assisted households include elderly households, small households, large households, and all other households. Assisted households will be primarily extremely low income.
- **Priority: Increase homeownership for lower income households through homebuyer assistance and new construction.**

Goal: Assist 100 lower income households to achieve homeownership — no units in Year 1

Resources:

HOME
Affordable Housing Trust Fund
Financial institutions
Non-profit Organizations

Description and Proposed Accomplishments: Should the County become a HOME Entitlement Community, funds will be used for a homebuyer program to provide down payment assistance. Funds can be used to write-down the cost of homes to prices that are affordable to lower income households. Such a program will be pursued with active involvement from local banks and mortgage companies that can provide permanent mortgage financing for low- and moderate-

income homebuyers. The County anticipates assisting 15 to 20 low- and moderate-income households annually, either current renters or owners, of all family sizes.

Geographic Distribution: The homebuyer assistance will be available County-wide.

- **Priority: Development of affordable housing**

Goal: Assist development of 200 rental units that are affordable to lower income households – no goal for Year 1

Goal: Assist in the development of 50 owner occupied housing units.

Resources:

HOME
CDBG
DCED HRA
PHFA PennHOMES
LIHTC
Federal Home Loan Bank
Affordable Housing Trust Fund
Financial institutions
Non-profit Organizations

Description and Proposed Accomplishments:

- Provide subsidies to for-profit or non-profit developers to construct rental housing units for households at or below 50 percent of MFI. The housing development program would be funded County-wide.
- Provide write-downs or construct infrastructure to allow the construction of 50 units of owner-occupied housing for low to moderate income buyers.

To address unmet or overburdened needs, the County encourages rental projects that include the following.

- Those that provide project based rental assistance.
- Those serving the lowest income households.
- Setasides for disabled households.
- Units with supportive services for seniors 75 and over.

Rents for units assisted by Lehigh County (including utilities or utility allowances) will be limited to HUD's published Fair Market Rent.

- Lehigh County expects the Housing Development Program will create up to 240 units over the next five years.

In recognition of the need for affordable housing, Lehigh County will also consider certifications of consistency by other entities for Federal assistance as follows:

- Public Housing Capital funds to continue with maintaining and modernizing several of public housing units in agreement with the Public Housing Agency Plan.

- The Low-income Housing Preservation Program - created to maintain units in the assisted housing inventory after the initial contract period with HUD expires or is terminated by early completion of the terms of the mortgage.

Needs of Public Housing

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

Program Year 1 Action Plan Public Housing Strategy response:

Lehigh County Housing Authority maintains 289 units of public housing. Each year the Authority is provided with money from HUD under the Capital Fund Program to undertake physical improvements. In addition, the Authority receives operating subsidies help to offset the operating deficits associated with public housing units and to carry out maintenance. The activities planned by the LCHA in 2007 are shown in the CFP Tables in the appendix to this document.

The County supports the Housing Authority’s efforts to work with tenants of public housing and Section 8 to achieve self-sufficiency.

LCHA is not troubled.

Barriers to Affordable Housing

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

Program Year 1 Action Plan Barriers to Affordable Housing response:

The barriers to development of affordable housing were outlined in the Five Year Plan. During 2007, Lehigh County will begin to address the affordable housing needs of the County and these barriers through the creation of a Housing Coordinator position. Jointly funded with Northampton County, this position will serve the Lehigh Valley and work to expand the supply of affordable housing. In the role of ombudsman and housing advocate, the Housing Coordinator will work with local municipalities, non-profit and for-profit housing developers and funding agencies to coordinate resources.

HOME/American Dream Down payment Initiative (ADDI)

NOT APPLICABLE

HOMELESS

Specific Homeless Prevention Elements

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

Program Year 1 Action Plan Special Needs response:

1. Funds to be available:

Lehigh County is part of a larger regional network of homeless services providers organized through the Northeast Regional Housing Advisory Board (NE RHAB). This group is the applicant for funding through the HUD Continuum of Care grant program. In 2007, an application for funds was made.

Individual shelters may apply to the Commonwealth of Pennsylvania for Emergency Shelter Grant Program funds. The County will support applications for ESG funds to the state and issue a Certification of Consistency.

2. Funding Priority:

The priority for funding is permanent supportive housing for both individuals and families. HOME funds, should the County become a HOME entitlement, would be used to support new permanent supportive housing in Lehigh County. In 2007, the County is not a HOME entitlement. Therefore the lack of funds for housing activities will be an obstacle for achieving this goal.

3. Chronic Homelessness:

Addressing chronic homelessness is a subset of the homelessness needs in the County. Permanent supportive housing would be available to and target persons who have been or would likely be chronically homeless. Again, permanent supportive housing is the preferred response to this need.

4. Prevention:

The five-year goal is to make significant steps in eliminating the sources of homelessness by providing services and shelters for the homeless and by providing assistance to very low- and low-income households that are threatened by homelessness. The objective is to assist low-income households or individuals in danger of becoming homeless with emergency assistance and long-term skills to prevent homelessness.

Goal: Assist 250 lower income households through FY 2011 through emergency services — assist 50 households in Year 1

Resources:

CDBG
FEMA
Private charitable donations

Proposed Activities: Catholic Charities – Self-Sufficiency/Intervention Program

Description and Proposed Accomplishments: Address the causes of homelessness and provide emergency assistance to low income persons and families through case management. The goal for 2007 is to assist 50 households.

5. Discharge Planning:

County agencies are working closely with the NE RAB to finalize protocols for discharge planning. Discharging persons who have been institutionalized to McKinney funded facilities is recognized as an unacceptable discharge plan. Formalizing plans with Foster care and medical institutions must still be completed. The state has taken the initiative to ensure compliance with the McKinney protocols.

Emergency Shelter Grants (ESG)

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

Program Year 1 Action Plan ESG response:

NOT APPLICABLE

COMMUNITY DEVELOPMENT

Non-Housing Community Development

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

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

1. Program Year 1 Annual Plan Community Development response:

Non-housing Community Development needs and priorities were identified in the course of preparing the Five Year Strategic Plan through the input of community leaders, citizen participation, and requests and ideas from a wide range of service providers and public agencies. The County has established the following objectives to integrate economic, physical, environmental, community and human development objectives in a comprehensive fashion. These objectives provide for significant change and improvement in our County in light of public input and visions of our future. These objectives are:

- To provide high quality public facilities and public improvements, such as streets, sidewalks and sewer, in low- and moderate-income neighborhoods
- To provide a wide range of quality services, including transportation, day care and youth and senior activities, to low- and moderate-income persons.
- To promote economic development activities as a means to provide job opportunities and economic growth.
- To conserve and renew older communities through improved downtown areas and historic preservation.
- To promote increased private investment and activity in community development activities

2. The specific activities to be undertaken in FY 2007 are detailed below:

Organization	Project	Description	Funding amount
ECONOMIC DEVELOPMENT			
BBRP	Façade Design Program	Funding to pay for design costs of eligible businesses. Estimated 5 projects per Boro @ \$700 per project.	\$14,000.00
County of Lehigh	County-Wide Façade Design Program	Funding to pay for design costs of eligible businesses. Estimated 4 projects per Boro @ \$700 per project.	\$11,200.00
County of Lehigh	Economic Development Fund	Loans to for-profit start up or expansion businesses to create jobs for lower income persons.	\$100,000.00
HOUSING			
County of Lehigh	County Wide Housing Rehab Program	Funding to pay for construction and delivery costs.	\$200,000.00
MUNICIPAL INFRASTRUCTURE PROJECTS			
Coplay Borough	Curb Cuts	Installation of curb ramps.	\$49,223.03
Emmaus Borough	Curb Cuts	Installation of curb ramps.	\$36,673.94
Whitehall Township	Curb Cuts	Installation of curb ramps.	\$49,223.03
Catasauqua Borough	3rd and Strawberry Lot	General parking.	\$66,000.00
Coopersburg Borough	Sewer Service Lateral Repair	Insert lining or replace sewer laterals.	\$61,250.00
Alburtis Borough	Sidewalks on Main Street	Construct sidewalks in residential area.	\$70,890.00
Fountain Hill Borough	Spiegel Street Storm Sewer Replacement	Replace storm sewer on Spiegel Street.	\$95,000.00
Slatington Borough	S. 7th Street Storm Sewer Improvements and street improvements	Construction of a storm sewer line and reconstruction of S. 7 th Street.	\$274,520.00

Organization	Project	Description	Funding amount
PUBLIC SERVICES			
Catholic Charities	Self-Sufficiency / Intervention Program		\$60,421.00
Lehigh County Senior Center	Whitehall, Coplay and Catasauqua Senior Program	Funding to pay for instructors, a mailing list, rent, and promotional mailings for new activities at Coplay Borough Hall.	\$12,587.00
LV Center for Independent Living	Comprehensive Housing Services for Citizens with Disabilities	Housing coordinator.	\$15,000.00
Turning Point of the Lehigh Valley	Domestic Violence Shelter Services	Shelter operations.	\$30,000.00
ADMINISTRATION AND PLANNING			
County of Lehigh	Housing Coordinator Planner	Ombudsman, planner and advocate for affordable housing development.	\$15,000.00
County of Lehigh	Administration	General Program administration, oversight and public information.	\$256,497.00
Emmaus Borough	Community Neighborhood Development Plan	Development of Neighborhood Plan for South Emmaus neighborhood.	\$15,000.00

The primary obstacle to meeting underserved needs is a lack of funds. There are many needs in all of the areas – public facilities, public services, infrastructure, and economic development – and municipal resources go only so far. The development of more and better jobs for low and moderate income persons would help reduce the scale or scope of needs as well.

Antipoverty Strategy

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

1. Program Year 1 Action Plan Antipoverty Strategy response:

Poverty is a function of income, which is related to education, job training and employment. Lehigh County remains committed to addressing the needs of its citizens who live at or below the poverty level. It is also recognized that the presence of poverty and the related social and economic problems are a destabilizing element in some communities.

In Lehigh County, Community Action Committee of the Lehigh Valley (CACLV) is the official anti-poverty agency. CACLV provides rent and utility assistance, case management and counseling services to assist with financial management and benefit entitlement assistance, home weatherization to reduce utility costs, furniture and household goods, alcohol and mental health counseling, a Family Savings Account Program, child care, transportation to work for up to six months and assistance in purchasing a

dependable vehicle, and other varied programs that empower low income households assisting them to develop skills for independent living. In support of employment opportunities, CACLV provides the following programs.

- The Rising Tide Loan Fund Program provides micro-loans of up to \$25,000 for start-up and expanding businesses. Start-up businesses may receive technical services through the “Start Your Business” training program.
- The Supported Work Program (SWP) is a six-month program designed to assist individuals moving from welfare to work. It focuses on those with less than a ninth-grade education and teaches the skills necessary in finding and keeping a job. The population served includes adults receiving Temporary Assistance to Needy Families (TANF) and persons who are eligible for Food Stamps only. This population requires assistance with job readiness skills, developing resumes, determining career goals, finding jobs, speaking and writing English, making child care arrangements, solving transportation problems and possibly including learning how to drive.

Participants in the CACLV Supported Work Program receive intensive case management, employability skills training, job placement, and support once employment is secured. Topics covered in the employability classes include: completing job applications, identifying employment opportunities, identifying barriers to employment, overcoming employment barriers, basic computer keyboarding, practicing job interviews, and developing long-term career plans.

- The Fowler Community Technology Center offers a variety of computer classes to help Lehigh Valley residents bridge the digital divide. The heart of the Center’s work is giving students a broader experience of technology that goes beyond the conventional school classroom. Through the use of creativity and play, students will grow in their skills and begin to understand the practical application of skills they have mastered. Included in the current curriculum are Lego robotics, graphic design, digital video and photography.

Lehigh County will provide CDBG funds to public service agencies to assist households below the poverty level with services and program support. The County will work with service providers to pursue resources and innovative partnerships to support the development of affordable housing, homelessness prevention, and emergency food and shelter.

To assist with economic development in support of job creation, Lehigh County administers various initiatives and agencies in support of economic development.

- The Lehigh County Department of Community and Economic Development (DCED) works with the Lehigh Valley Chamber of Commerce through the Borough Business Revitalization Program (BBRP) to provide economic development services to the Lehigh Valley’s small towns. The BBRP mobilizes volunteers and partners in the public and private sectors to target investment and development into the Lehigh Valley’s smaller urban cores and central business districts.
- Lehigh County works in conjunction with Lehigh Valley Economic Development Corporation (LVEDC), community organizations, other economic development groups and the Workforce Investment Board to help enhance programs and create opportunities in the County.

- Lehigh County Economic Development Corporation (LVEDC) is able to provide manufacturing, industrial, and nonprofit organizations with low interest financing generated through tax exempt revenue bonds.
- Lehigh County CareerLink offers job search counseling, skills assessment programs, GED courses, information on training programs and workshops on many subjects, including resume writing and interview skills. Considered a one-stop location for all employment needs, CareerLink offers a multi-faceted approach to the job market. Specialized services for mature workers, youth, persons with disabilities, veterans, dislocated workers and cash assistance recipients are available at CareerLink.

Job creation and economic growth is increasing becoming linked through Workforce Housing awareness. Options for expanding housing opportunities in closer proximity to jobs and reducing the transportation burden or creating new jobs in areas closer to the housing centers in the County are being explored.

NON-HOMELESS SPECIAL NEEDS HOUSING

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

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

1. Program Year 1 Action Plan Specific Objectives response:

The Five-Year Strategic Plan highlights the needs of persons with mental illness and the County's actions to develop specific housing interventions. In addition, federal legislation requires that the needs of Women who are victims of domestic violence be addressed as well.

As described in that Needs Assessment, there exists the need to develop permanent supportive housing for populations with special needs. The need for supportive housing for the mentally disabled was stressed during the consultation participation process. Persons with mental illness are disproportionately represented among persons who are homeless.

2. Resources expected to address need:

The County has established as a priority objective to create new permanent supportive housing for persons who are mental ill. During 2007, the County will support the actions of the Department of Human Services, Mental Health Program to develop housing for persons with mental illness using the Health Choices Reinvestment funds.

The Lehigh County Mental Health Program supports the Local Housing Options Team (LHOT). The LHOT is working on the development of a Fairweather Lodge. The conceptual design of this program is to provide group living space for 6 to 8 individuals with employment through development of a communal business venture. The model fosters independence and self-sufficiency in a safe, supportive environment for persons with serious mental illness.

Victims of Domestic Violence

The Violence Against Women Act of 2005 amended the Cranston Gonzales National Affordable Housing Act and now requires jurisdictions receiving funds from HUD to consider the housing needs of persons who have been a victim of domestic violence, dating violence or stalking. There are few housing facilities serving victims of domestic violence in Lehigh County.

Turning Point is the only domestic violence agency that provides shelter exclusively for victims of domestic violence. Turning Point also offers limited transitional housing.

The need for housing for victims of domestic violence is currently high and growing in the region. The challenge in operating such housing is the need for housing subsidies, often at 100%, and funding for staff and support services. During 2007, Lehigh County will support the operation of the Turning Point emergency shelter.

Housing Opportunities for People with AIDS

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

Program Year 1 Action Plan HOPWA response:

NOT APPLICABLE

Specific HOPWA Objectives

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

Program Year 1 Specific HOPWA Objectives response:

NOT APPLICABLE

OTHER NARRATIVE

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