
LEHIGH COUNTY, PENNSYLVANIA

DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT

17 South Seventh Street, Room 519, Allentown, PA 18101

FY 2014 Annual Action Plan

*In Accordance with the HUD Guidelines for the
Community Development Block Grant*

Frank Kane, Director
Department of Community and
Economic Development



BUILT ON EXPERIENCE
**URBAN
DESIGN
VENTURES**

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Executive Summary

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

1. Introduction

Lehigh County, as a Federal Entitlement, is required to complete an annual application for the use of the Community Development Block Grant (CDBG) funds to the U.S. Department of Housing and Urban Development (HUD). The Annual Action Plan is a guide to how the County will allocate its resources for specific activities that support the Goals and Objectives of Lehigh County's Five Year Consolidated Plan. This is Lehigh County's Third Annual Action Plan of the FY 2012-2016 Five Year Consolidated Plan. The Five Year Plan describes the housing and non-housing needs of County residents and presents a five year strategy to address those needs. The FY 2014 Annual Action Plan for Lehigh County includes the County's CDBG Program and outlines which activities the County will undertake during the program year beginning October 1, 2014 and ending September 30, 2015. Lehigh County's Department of Community and Economic Development is the lead entity and administrator for the CDBG funds.

The FY 2014 Annual Action Plan outlines the actions to be undertaken in Fiscal Year 2014 with the Federal resources to be received by Lehigh County. The FY 2014 Annual Action Plan excludes the cities of Allentown and Bethlehem since they both are Federal Entitlements that receive their own CDBG allocations from HUD. The CDBG Program and activities outlined in this FY 2014 Annual Action Plan will principally benefit low- and moderate-income persons and funding has been targeted to areas of the County where there is the highest percentage of low- and moderate-income residents. The Annual Action Plan does not incorporate the Public Housing Authority's Comprehensive Grant (Comp Grant) process into this consolidated planning and application process, but the public housing authority participated in the planning process for the development of this plan.

The Five Year Consolidated Plan relied upon efforts of many individuals, organizations and citizens, in the development of a comprehensive strategy to address the needs of the County. The goal of Lehigh County is to improve the quality of life for County residents by funding improvements to public facilities, infrastructure, public services, and by retaining and increasing the stock of affordable owner and rental housing units.

Available Funds:

The following financial resources are included in the FY 2014 Annual Action Plan which anticipates funding to be received to address the priority needs and specific objectives identified in Lehigh County's FY 2012-2016 Consolidated Plan and Strategy. Lehigh County anticipates it will receive the following Federal funds during the FY 2014 program year:

Entitlement Funds	Amount
FY 2014 CDBG Funds	\$ 1,152,713.00
CDBG Program Income	\$ 0.00
Totals:	\$ 1,152,713.00

Table 1 - Federal Resources

FY 2014 CDBG Program Budget:

Lehigh County proposes to undertake the following activities with the FY 2014 CDBG funds:

1. Public Facilities Improvements -

- Borough of Alburtis - Curb Cuts: \$40,000
- Borough of Coopersburg - Sanitary Sewer Rehabilitation: \$100,000
- Borough of Emmaus - Curb Cuts: \$40,000
- Borough of Fountain Hill - North Clewell Street Reconstruction and Curb Cuts: \$120,000
- Borough of Macungie - Curb Cuts: \$40,000
- Township of Salisbury - Waterline Replacement: \$150,000
- Borough of Slatington - East Washington Street Reconstruction and Curb Cuts: \$75,421
- Township of Whitehall - Iron Street Reconstruction: \$85,000

2. Housing -

- County-wide Housing Rehab - Housing Rehabilitation Financing: \$150,000

3. Public Services -

- Catholic Charities - Self-sufficiency & Intervention Program: \$29,700
- Communities in Schools of the Lehigh Valley - School-to-Career Program: \$21,650
- Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program: \$20,400
- Meals on Wheels of Lehigh County - Meal Preparation and Delivery: \$20,000

- North Penn Legal Services - LMI Legal Aide: \$10,000
- The Literacy Center - Adult Literacy Instruction: \$20,000

4. Administration -

- Administration: \$230,542

Total: \$1,152,713.00

Maps:

Included in this Annual Action Plan Exhibit section are the following maps which illustrate the demographic characteristics of Lehigh County at the time of the 2010 U.S. Census:

- Total Population by Census Tract Map
- Percentage of White Population by Census Tract Map
- Percentage of Minority Population by Census Tract Map
- Percentage of Hispanic Population by Census Tract Map
- Percentage of Population Ages 65 and Over by Census Tract Map
- Total Housing Units by Census Tract Map
- Percentage of Owner-Occupied Housing Units by Census Tract Map
- Percentage of Renter-Occupied Housing Units by Census Tract Map
- Low- and Moderate-Income by Block Group Map
- FY 2014 CDBG Activity Map

2. Summarize the objectives and outcomes identified in the Plan

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

The goal of Lehigh County is to improve the quality of life for County residents by funding improvements to public facilities, infrastructure, public services, and by retaining and increasing the supply of affordable housing units for both owner occupants and renters. During the FY 2014 CDBG Program Year, the County proposes to address the following priority need categories identified in its Five Year Consolidated Plan:

GOAL: HOUSING - H

H-1: Retain Existing Housing Stock - rehabilitate and stabilize the housing stock of both owner and renter occupied housing.

The County's objectives to meet this goal are:

Five year:

- Rehabilitate 50 owner-occupied housing units.
- Encourage the rehabilitation of 150 rental units that are affordable to lower income households.
- Provide 150 homeowners facing foreclosure with access to foreclosure mitigation counseling services.

Annual:

- Rehabilitate 5 owner-occupied housing units.

H-2: Development of Affordable Housing - Provide financial and technical assistance for the development of new housing and the rehabilitation of vacant housing. Such housing will provide opportunities for very low-income and low-income renters and low-income to moderate income homebuyers.

The County's development objectives are:

Five year:

- Assist the development of 10 owner occupied housing units.
- Assist the development of 150 rental units that are affordable to lower income households.

Annual: Lehigh County did not fund any projects during this program year.

H-3: Homebuyer's Assistance - Provide down payment and closing cost assistance for low- and moderate-income homebuyers.

The County's objectives are:

Five year: Assist 20 lower income households achieve homeownership.

Annual: Assist lower-income households to achieve homeownership through the Affordable Housing Trust Funds.

GOAL: HOMELESS - HA

HA-1: Homelessness Prevention

The County's objectives are:

Five year:

- Provide rent and utility assistance to 50 households to prevent homelessness.
- Prevent homelessness through effective discharge planning from publicly-funded institutions.

Annual: Provide rent and utility assistance to 30 households to prevent homelessness.

HA-2: Services

The County's objectives are:

Five year:

- Expand the capacity of local housing and service providers in rural areas to serve homeless families and individuals.
- Develop new resources for supportive services to supplement mainstream services.

Annual: Lehigh County did not fund any projects during this program year.

HA-3: Shelter and Transitional Housing

The County's objectives are:

Five year:

- Continue to meet the regional needs for shelter and transitional housing.
- Shorten the length of time individuals and families are homeless by 20% over five years.
- Reduce the recurrence of homelessness among sheltered families and individuals over the next five years.

Annual: Lehigh County will prepare a State Emergency Solutions Grant Application.

HA-4: Permanent Housing

The County's objectives are:

Five year: Expand permanent supportive housing for homeless individuals and persons in families with disabilities by creating thirty-four (34) new permanent supportive housing units in the twelve (12) county Continuum of Care.

Annual: Lehigh County will support the Northeast Pennsylvania Continuum of Care Network with its FY 2014 CoC Application.

HA-5: Non-Homeless Special Needs

The County's objectives are:

Five year: Develop 15 units of housing for persons with special needs.

Annual: Lehigh County did not fund any projects during this program year.

GOAL: NON-HOUSING COMMUNITY DEVELOPMENT - CD

Community Development Block Grant (CDBG) funds are directed to local municipalities to address the quality of life in low-income areas through infrastructure and public facility improvements.

CD-1: Public Facilities and Infrastructure

The County's objectives are:

Five Year: Assist municipalities with projects of community significance

- Clearance and demolition (2 units)
- Sewer, water improvements (8 projects)
- Storm sewer improvements (5 projects)
- Sidewalk improvements, including handicap accessibility (10 projects)
- Street improvements (5 projects)
- Parks and recreation improvements (3 projects)

Annual:

- Sewer, water improvements (2 projects)
- Sidewalk improvements, including handicap accessibility (5 projects)
- Street improvements (3 projects)

CD-2: Economic Development

The County's objectives are:

Five Year: Assist businesses to establish and grow in Lehigh County

- Provide loans to two (2) businesses
- Promote façade improvements and downtown revitalization in borough and township business districts

Annual: Lehigh County did not fund any projects during this program year.

CD-3: Public Services

The County's objectives are:

Five Year: Assist human service organizations provide essential services to at-risk populations

- Homeless prevention services
- Housing referral and counseling for the disabled
- Literacy and English as a Second Language education
- Subsistence services
- Fair Housing outreach, education and advocacy

Annual: Assist human service organizations provide essential services to at-risk populations

- Homeless prevention services (30 persons)
- Housing referral and counseling for the disabled (30 persons)
- Literacy and English as a Second Language education (100 persons)
- Subsistence services (64 persons)
- Fair Housing outreach, education and advocacy (50 persons)
- Career Counseling (20 persons)

3. Evaluation of past performance

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

Lehigh County has a good performance record with HUD and regularly meets its established performance standards. Each year the County prepares a Consolidated Annual Performance Evaluation Report (CAPER). This report is submitted to HUD within ninety (90) days after the start of the next program year. Copies of the FY 2012 CAPER are available for review at the Lehigh County Department of Community and Economic Development Offices and available on the County website. The FY 2012 CAPER, which was the first CAPER for the FY 2012-2016 Five Year Consolidated Plan, was submitted to HUD by December 29, 2013. HUD approved the FY 2012 CAPER by a letter dated February 20, 2014. In the FY 2012 CAPER, Lehigh County expended 100% of its CDBG funds to benefit low- and moderate-income persons. The County expended 10.35% of its funds during the FY 2012 CAPER period on public services, which is below the statutory maximum of 15%. The County obligated 20% of its funds during this CAPER period on Planning and Administration, which meets the 20% regulatory cap. As of August 2, 2013, Lehigh County was under the required 1.5 maximum drawdown ratio at a ratio of 1.04.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Annual Action Plan is made up of multiple components, which includes: funding applications from municipalities/social service agencies and housing organizations; citizen participation; and the development of the Annual Action Plan.

Each item of the plan helps benefit the low- and moderate-income population in Lehigh County. Lehigh County has an approved Citizen Participation Plan, as required by HUD, which is on file with HUD and at the Lehigh County Department of Community Economic Development. The County abided by its Citizen Participation Plan in the preparation and development of the FY 2014 Annual Action Plan.

The first step of the planning process for the FY 2014 Annual Action Plan started with holding two (2) public hearings to obtain citizen input on the needs of Lehigh County. The first needs hearing was held on Tuesday, March 11, 2014 at 2:00 PM at the Lehigh County Public Hearing Room located at 17 South Seventh Street, Allentown, PA. The first needs hearing was posted on the County's website and emails were sent to local municipalities and non-profit agencies/organizations. The second needs hearing was held on Thursday, March 27, 2014 at 6:00 PM in the Lehigh County Public Hearing Room located at 17 South Seventh Street, Allentown, PA. The needs public hearing notice was published on Monday, February 24, 2014 in the "Morning Call", and the hearing notice was posted on the County's website and emails were sent to local municipalities and non-profit agencies/organizations. At these public hearings, citizens had the opportunity to give their input and their thoughts on the housing, community development, and economic development needs in Lehigh County and how the CDBG funds should best be spent to benefit low- and moderate-income persons.

On Friday, February 21, 2014 the Department of Community and Economic Development made the FY 2014 CDBG application available to local municipalities and non-profit agencies/organizations which were due back to the County by 4:00 PM on Tuesday, April 15, 2014. Information was also available on the Lehigh County Department of Community and Economic Development's website.

The Final Public Hearing Notice was published on Monday, July 14, 2014. At the Public Hearing, held on Friday, August 1, 2014 at 3:00 PM, the citizens were given the opportunity to comment on the "draft" version of the FY 2014 Annual Action Plan and which projects/activities would be funded with FY 2014 CDBG funds.

The FY 2014 Annual Action Plan was on public display beginning July 14, 2014 through August 13, 2014 at the following locations in the County and on the County's website (<http://www.lehighcounty.org/>):

- **Lehigh County Department of Community and Economic Development** - Lehigh County Government Center, 17 South 7th Street, Allentown, PA 18101
- **Catasauqua Public Library** - 302 Bridge Street, Catasauqua, PA 18032
- **Coplay Library** - 49 South 5th Street, Coplay, PA 18037
- **Emmaus Public Library** - 11 East Main Street, Emmaus, PA 18049
- **Lower Macungie Library** - 3400 Brookside Road, Macungie, PA 18062
- **Parkland Community Library** - 4422 Walbert Avenue, Allentown, PA 18104
- **Slatington Library** - 650 Main Street, Slatington, PA 18080
- **Southern Lehigh Public Library** - 3200 Preston Lane, Center Valley, PA 18034
- **Whitehall Township Public Library** - 3700 Mechanicsville Road, Whitehall, PA 18052

The following schedule was used in the preparation of the FY 2014 Action Plan:

- **Citizen, provider, and stakeholder consultation** - February 24, 2014 through August 13, 2014
- **Applications for CDBG funds were made available** - February 22, 2014
- **Posting and emails were sent for the Needs Public Hearing** - February 21, 2014
- **Published the Needs Public Hearing Notice** - February 24, 2014
- **First Needs Public Hearing** - March 11, 2014
- **Second Needs Public Hearing** - March 27, 2014
- **CDBG Funding Requests due to Lehigh County** - April 15, 2014
- **Published the Final Public Hearing Notice** - July 14, 2014
- **FY 2014 Annual Action Plan on display; begin 30 day public comment period** - July 14, 2014
- **Final Public Hearing** - August 1, 2014
- **End 30 day public comment period** - August 13, 2014
- **Submission of Annual Plan to HUD** - August 15, 2014
- **Program Year Begins** - October 1, 2014

5. Summary of public comments

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

Lehigh County received public comments at the two (2) public hearings on needs. Citizen Participation, including the newspaper notices, the sign-in sheets, and the summary of the minutes from the public hearings, are included in the Exhibits Section under Citizen Participation.

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

All of the previous comments were accepted and the requests for funding were incorporated into the FY 2014 CDBG Program.

7. Summary

The FY 2014 Annual Action Plan for Lehigh County includes the County's CDBG Program and outlines which activities the County will undertake during the program year beginning October 1, 2014 and ending September 30, 2015. This is the County's third year of the FY 2012-2016 Five-Year Consolidated Plan.

During the FY 2014 Program Year, Lehigh County, Pennsylvania anticipates the following Federal financial resources:

• FY 2014 CDBG Funds	\$ 1,152,713.00
• CDBG Program Income	\$ 0.00
Total:	\$ 1,152,713.00

During the FY 2014 CDBG Program Years, Lehigh County proposes to address the following priority need categories from its Five Year Consolidated Plan:

- **Housing Goal** – retain the existing housing stock, development of affordable housing, and homebuyer assistance.
- **Homeless Goal** – homelessness prevention, services, shelter and transitional housing, permanent housing, and non-homeless special needs.
- **Non-Housing Community Development Goal** – public facilities and infrastructure, economic development, and public services.

A “draft” of the FY 2014 Annual Action Plan was placed on display at the Lehigh County Government Center and the County’s website, which is at the location of the Department of Community and Economic Development offices located at 17 South Seventh Street, Allentown, PA, as well as eight (8) regional libraries for public review. The display period started on Monday, July 14, 2014 through Wednesday, August 13, 2014 for a 30 day display period. In addition, the County put the draft Plan on its website (<http://www.lehighcounty.org/>). A Final Public Hearing was held on Friday, August 1, 2014 to discuss the proposed activities and solicit citizen comments. Upon completion of the 30 day comment period, Lehigh County will submit the FY 2014 Annual Action Plan to the U.S. Department of Housing and Urban Development Philadelphia Office on or before Friday, August 15, 2014.

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	Lehigh County	
CDBG Administrator	Lehigh County	Community and Economic Development
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

Table 2 – Responsible Agencies

Narrative (optional)

The Lehigh County Department of Community and Economic Development is the administrating agency for the CDBG program. The Community and Economic Development Department has five (5) full-time staff members and a planning consulting firm to help assist with the oversight and compliance of the CDBG and housing programs. The Department of Community and Economic Development prepares the Five Year Consolidated Plan, Annual Action Plans, ERR’s, and the Consolidated Annual Evaluation Reports (CAPER), draws down funds for invoices, performs contract administration, and oversees the program on a day to day basis. Sub-recipients are monitored on an annual basis for compliance, or as needed.

Consolidated Plan Public Contact Information

Contact Person:

- Mr. Frank Kane, Director for the Lehigh County Department of Community and Economic Development

Address:

- Lehigh County Government Center, 17 South 7th Street, Allentown, PA 18101

Phone:

- (610) 782-3566

Fax:

- (610) 820-8257

Email:

- FrankKane@lehighcounty.org

Website:

- <http://www.lehighcounty.org/>

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**1. Introduction**

While preparing the FY 2014 Annual Action Plan, Lehigh County consulted with the Lehigh County Housing Authority, local municipalities, non-profit agencies/organizations, and members of the Northeast Regional Homeless Advisory Board (NE-RHAB), which includes twelve (12) counties in Eastern Pennsylvania, including Lehigh County.

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

Lehigh County works with the following agencies to enhance coordination:

- **Lehigh County Department of Community and Economic Development** - oversees the CDBG program.
- **Lehigh County Housing Authority** - oversees the Section 8 Housing Choice Voucher Program, improvements to public housing communities, and the development of scattered site affordable housing.
- **Social Services Agencies** - the County provides funds to address the needs of low- and moderate-income persons.
- **Housing Providers** - the County provides funds to rehabilitate and develop affordable housing for low- and moderate-income families and individuals.
- **Northeast Regional Homeless Advisory Board (NE-RHAB)** - oversees the Continuum of Care Network for Northeast Pennsylvania for the following counties: Lehigh, Northampton, Schuylkill, Carbon, Monroe, Pike, Wayne, Susquehanna, Wyoming, Sullivan, Bradford, and Tioga.

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

Not Applicable, Lehigh County does not receive an ESG entitlement grant.

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

The Northeast Regional Homeless Advisory Board (NE-RHAB) Continuum of Care Network for Northeast Pennsylvania is an ESG member of the Pennsylvania CoC. The NE-RHAB members receive State ESG funds through the Pennsylvania Department of Community and Economic Development (PA DCED).

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

See attached chart.

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1.	Agency/Group/Organization	Lehigh County Housing Authority
	Agency/Group/Organization Type	Housing PHA Other Government - County
	What section of the Plan was addressed by Consultation?	Public Housing Needs Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Lehigh County Housing Authority was contacted and presented the housing needs of very low income persons. The County reviewed its program and funded activities that met the goals and objectives as outlined in the County's Five Year Consolidated Plan to address these housing needs.
2.	Agency/Group/Organization	North Penn Legal Services
	Agency/Group/Organization Type	Housing Services-Education Services-Employment Service-Fair Housing Regional Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	North Penn Legal Services was contacted and submitted a request for continued funding. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Five Year Consolidated Plan.
3.	Agency/Group/Organization	Lehigh County Children and Youth Services
	Agency/Group/Organization Type	Services-Children Child Welfare Agency Other Government - County

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Lehigh County Children and Youth Services was contacted. The County did not receive a funding application or any comments from this agency.
4.	Agency/Group/Organization	Lehigh County Office of Aging and Adult Services
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities Other government – County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Lehigh County Office of Aging and Adult Services was contacted. The County did not receive a funding application or any comments from this agency.
5.	Agency/Group/Organization	Lehigh County Mental Health
	Agency/Group/Organization Type	Services-Education
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Lehigh County Mental Health was contacted. The County did not receive a funding application or any comments from this agency.
6.	Agency/Group/Organization	AIDS Activities Office of the Lehigh Valley Hospital
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Health Agency Regional organization
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p> <p>AIDS Activities Office of Lehigh Valley Hospital was contacted. The County did not receive a funding application or any comments from this agency.</p>
<p>7. Agency/Group/Organization</p>	<p>Northeast Regional Housing Advisory Board</p>
<p>Agency/Group/Organization Type</p>	<p>Housing Services-homeless Service-Fair Housing Regional organization</p>
<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy</p>
<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Northeast Regional Housing Advisory Board was contacted. The County did not receive an application or any comments from this agency.</p>
<p>8. Agency/Group/Organization</p>	<p>Lehigh Valley Planning Commission</p>
<p>Agency/Group/Organization Type</p>	<p>Regional Organization Planning Organization</p>
<p>What section of the Plan was addressed by Consultation?</p>	<p>Market Analysis</p>
<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Lehigh Valley Planning Commission was contacted. The County did not receive a funding application or any comments from this agency.</p>

Table 3 – Agencies, groups, organizations who participated

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

All known agency types were consulted and contacted during the planning process.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Northeast Regional Homeless Advisory Board (NE-RHAB)	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.

Table 4 – Other local / regional / federal planning efforts

Narrative (optional)

Not applicable.

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AP-12 Participation – 91.105, 91.200(c)**1. Summary of citizen participation process/Efforts made to broaden citizen participation****Summarize citizen participation process and how it impacted goal-setting**

The FY 2014 Annual Action Plan has many components which include citizen participation. These components include the following: applications for funding from CDBG agencies from municipalities/social service and housing organizations, meetings and phone calls with municipalities/social services, and housing agencies/organizations on how to complete the CDBG Applications. In addition there were two needs hearing held, two (2) readings of the CDBG budget, and a final public hearing to gather public comments on the “draft plan” on public display. All these comments are included in the Annual Action Plan in the Citizen Participation Section of the Plan. Through the citizen participation process, the County uses citizen input to develop how the plan will best serve the low- and moderate-income population needs and to reach its goals of the Five Year Consolidated Plan.

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Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1.	Public Meeting	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Agencies	See public hearing comments in the summaries.	See public hearing summaries.	None	http://www.lehighcounty.org

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2.	Newspaper Ad	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Agencies	None	None	None	Not Applicable
3.	Internet Outreach	Non-targeted/ broad community	None	None	None	http://www.lehighcounty.org

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4.	Email Blast	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Agencies	Submitted applications for funding and provided comments at the public hearings.	Addressed needs through funding.	None	Not Applicable

Table 5 – Citizen Participation Outreach

Expected Resources

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

Introduction

Lehigh County is will receive \$1,152,713 from CDBG funds for the FY 2014 program year. The program year goes from October 1, 2014 through September 30, 2015. These funds will be used to address the following priority needs: Housing, Non-Housing Community Development such as retaining the existing housing stock, development of affordable housing, homelessness prevention, services, public facilities and infrastructure, economic development, and public services. The accomplishments of these projects/activities will be reported in the FY 2014 Consolidated Annual Performance and Evaluation Report (CAPER).

Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public - Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,152,713	0	0	1,152,713	0	16 projects/activities were funded based on the CDBG allocations.

Table 6 - Expected Resources – Priority Table

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

Lehigh County is eligible to receive funds during this program year from the following Federal, State, County, and Private Organizations:

- **Lehigh County Affordable Housing Trust Funds (AHTF)** - The Pennsylvania Optional County Affordable Housing Trust Funds Act of 1992 (the Act), allows counties to raise revenues for affordable housing efforts by increasing the fees charged by the Recorder of Deeds Office for recording deeds and mortgages. The County raised the fee from \$13 to \$26 per document. Affordable Housing Trust Funds revenue is used to fund affordable housing initiatives and up to 15 percent may be used for the administrative costs to implement the initiatives. Eligible activities include using the revenues as the local matching funds to secure Federal and State Funds, construction or rehabilitation financing, housing related services, match for other State or Federal funds, and supporting first-time homebuyer second mortgage programs. In FY 2014, Lehigh County will allocate approximately \$350,000 from the AHTF.
- **Lehigh County Community Revitalization and Development Program** - This program provides grants for community revitalization projects in designated municipalities in Lehigh County.
- **Continuum of Care Grant** - The Lehigh County is part of the Northeast Regional Housing Advisory Board (NE-RHAB). This is a twelve (12) county region that applies for Continuum of Care funds each year. In FY 2013, the NE-RHAB received funding for thirty-three (33) renewals totaling \$4,875,397 for support services, permanent supportive housing, and transitional housing projects throughout the region. HUD will contract with these agencies during the FY 2014 program year.
- Lehigh County will be applying for Emergency Solutions Grant (ESG) funds from the Pennsylvania Department of Community and Economic Development (PA DCED). If awarded ESG Funds, they will be used to support emergency shelter programs and to provide resources to prevent homelessness and rapidly re-housing of those that become homeless throughout the County including Allentown.
- **The Lehigh County Housing Authority** - Expects to receive funds from the Public Housing Capital Fund Program, Public Housing Operating funds, and Section 8 Housing Choice Voucher assistance.
- Other federal funds that may be used in support of housing, community development, and economic development during FY 2014 include loans through HUD's Section 108 Loan Program, Brownfields Economic Development Initiative (BEDI) grants, HUD Supportive Housing Programs.

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

Not Applicable.

Discussion

Lehigh County is a member of the Northeast Pennsylvania Continuum of Care Network, PA-509 Continuum of Care, administered by the Northeast Regional Homeless Advisory Board (NE-RHAB). The PA-509 Continuum of Care falls under the Pennsylvania (PA-509 Continuum of Care) and covers twelve (12) counties in the region. The following agencies in Lehigh County received FY 2013 CoC funds:

- **Catholic Charities of Diocese of Allentown, Inc.** - received \$79,253 for permanent supportive housing.
- **Community Action Committee of the Lehigh Valley - Ferry Street Apartments** - received \$64,325 for supportive services.
- **Lehigh County Conference of Churches - Outreach and Case Management for the Disabled, Chronically Homeless** - received \$164,686 for support services.
- **Lehigh County Conference of Churches - Pathways TBRA for Families, Youth, and Veterans** - received \$273,801 for permanent supportive housing.
- **Lehigh County Conference of Churches - Tenant Based Rental Assistance for the Disabled, Chronically Homeless** - received \$209,106 for permanent supportive housing.
- **Lehigh County Housing Authority - Shelter Plus Care** - received \$167,613 for permanent supportive housing.
- **Lehigh County Housing Authority - Shelter Plus Care** - received \$183,178 for permanent supportive housing.
- **Salvation Army of the Lehigh Valley - Allentown Hospital Housing Permanent Housing Program** - received \$150,574 for permanent supportive housing.
- **The Program for Women and Families, Inc. - Transitional Residence Continuum of Care Initiative** - received \$101,423 for support services.
- **Valley Housing Development Corporation - SHP for Persons with Mental Illness # 2** - received \$188,052 for permanent supportive housing.
- **Valley Housing Development Corporation - SHP for Persons with Mental Illness # 3** - received \$121,205 for permanent supportive housing.

housing.

- **Valley Housing Development Corporation - SHO for Persons with Mental Illness # 4** - received \$106,430 for permanent supportive housing.
- **Valley Youth House Committee, Inc. - Supportive Housing for Families** - received \$228,496 for transitional housing.
- **Valley Youth House Committee, Inc. - Supportive Housing for Families** - received \$465,624 for transitional housing.

In Lehigh County, as a member of the CoC, there is a network of provider agencies that address the shelter and transitional housing needs of persons who are homeless. The shelter and transitional housing in Lehigh County include:

- Community Action Committee of the Lehigh Valley - Sixth Street Shelter (Emergency Shelter)
- Community Action Committee of Lehigh Valley - Turner Street Apartments (Transitional Housing)
- Salvation Army Emergency Shelter (Emergency Shelter)
- Salvation Army Transitional Shelter (Transitional Housing)
- Allentown Rescue Mission (Emergency Shelter)
- Allentown Rescue Mission Christian Living and Values Transitional Program (Transitional Housing)
- Turning Point of the Lehigh Valley (Domestic Violence) (Transitional Housing)
- The Program for Women and Families, Inc. (Transitional Housing)
- Valley Youth House (Emergency Shelter)
- Valley Youth House - Maternity Group Home (Transitional Housing)
- Valley Youth House - Supportive Housing for Families (Transitional Housing)
- Valley Youth House - Supportive Housing for Youth (Transitional Housing)

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1.	H-1 Retain Existing Housing Stock	2012	2016	Affordable Housing	N/A	Housing - H	CDBG: \$150,000	Homeowner Housing Rehabilitated: 5 Household Housing Units
2.	H-2 Development of Affordable Housing	2012	2016	Affordable Housing	N/A	Housing - H	CDBG: \$0	
3.	H-3 Homebuyer's Assistance	2012	2016	Affordable Housing	N/A	Housing - H	CDBG: \$0	
4.	HA-1 Homeless Prevention	2012	2016	Homeless	N/A	Homeless - HA	CDBG: \$29,700	Public service activities for Low/Moderate Income Housing Benefit: 30 Households Assisted
5.	HA-2 Services	2012	2016	Homeless	N/A	Homeless - HA	CDBG: \$0	
6.	HA-3 Shelter and Transitional Housing	2012	2016	Homeless	N/A	Homeless - HA	CDBG: \$0	
7.	HA-4 Permanent Housing	2012	2016	Affordable Housing Homeless	N/A	Homeless - HA	CDBG: \$0	
8.	HA-5 Non-Homeless Special Needs	2012	2016	Affordable Housing Non-Homeless Special Needs	N/A	Homeless - HA	CDBG: \$0	

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9.	CD-1 Public Facilities and Infrastructure	2012	2016	Non-Housing Community Development	N/A	Non-Housing Community Development - CD	CDBG: \$650,421	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 8,502 Persons Assisted Other: 3 Other
10.	CD-2 Economic Development	2012	2016	Non-Housing Community Development	N/A	Non-Housing Community Development - CD	CDBG: \$0	
11.	CD-3 Public Services	2012	2016	Non-Housing Community Development	N/A	Non-Housing Community Development - CD	CDBG: \$121,750	Public service activities other than Low/Moderate Income Housing Benefit: 234 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 60 Households Assisted

Table 7 – Goals Summary

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Goal Descriptions

1.	Goal Name	H-1 Retain Existing Housing Stock
	Goal Description	<p>Rehabilitate and stabilize the housing stock of both owner and renter occupied housing.</p> <p>The County’s objectives to meet this goal are:</p> <p>Five year:</p> <ul style="list-style-type: none"> • Rehabilitate 50 owner-occupied housing units. • Encourage the rehabilitation of 150 rental units that are affordable to lower income households. • Provide 150 homeowners facing foreclosure with access to foreclosure mitigation counseling services. <p>Annual:</p> <ul style="list-style-type: none"> • Rehabilitate 5 owner-occupied housing units.
2.	Goal Name	H-2 Development of Affordable Housing
	Goal Description	<p>Provide financial and technical assistance for the development of new housing and the rehabilitation of vacant housing. Such housing will provide opportunities for very low-income and low-income renters and low-income to moderate income homebuyers.</p> <p>The County’s development objectives are:</p> <p>Five year:</p> <ul style="list-style-type: none"> • Assist the development of 10 owner occupied housing units. • Assist the development of 150 rental units that are affordable to lower income households. <p>Annual: Lehigh County did not fund any projects during this program year.</p>

3.	Goal Name	H-3 Homebuyer's Assistance
	Goal Description	<p>Provide down payment and closing cost assistance for low- and moderate-income homebuyers.</p> <p>The County's objectives are:</p> <p>Five year: Assist 20 lower income households achieve homeownership.</p> <p>Annual: Assist lower income households to achieve homeownership through the Affordable Housing Trust Funds.</p>
4.	Goal Name	HA-1 Homeless Prevention
	Goal Description	<p>The County's objectives are:</p> <p>Five year:</p> <ul style="list-style-type: none"> • Provide rent and utility assistance to 50 households to prevent homelessness. • Prevent homelessness through effective discharge planning from publicly-funded institutions. <p>Annual:</p> <ul style="list-style-type: none"> • Provide rent and utility assistance to 30 households to prevent homelessness.
5.	Goal Name	HA-2 Services
	Goal Description	<p>The County's objectives are:</p> <p>Five year:</p> <ul style="list-style-type: none"> • Expand the capacity of local housing and service providers in rural areas to serve homeless families and individuals. • Develop new resources for supportive services to supplement mainstream services. <p>Annual: Lehigh County did not fund any projects during this program year.</p>

6.	Goal Name	HA-3 Shelter and Transitional Housing
	Goal Description	<p>The County’s objectives are:</p> <p>Five year:</p> <ul style="list-style-type: none"> • Continue to meet the regional needs for shelter and transitional housing. • Shorten the length of time individuals and families are homeless by 20% over five years. • Reduce the recurrence of homelessness among sheltered families and individuals over the next five years. <p>Annual: Lehigh County will prepare a State Emergency Solutions Grant Application.</p>
7.	Goal Name	HA-4 Permanent Housing
	Goal Description	<p>The County’s objectives are:</p> <p>Five year: Expand permanent supportive housing for homeless individuals and persons in families with disabilities by creating thirty-four (34) new permanent supportive housing units in the twelve (12) county Continuum of Care.</p> <p>Annual: Lehigh County will support the Northeast Pennsylvania Continuum of Care Network with its FY 2014 CoC Application.</p>
8.	Goal Name	HA-5 Non-Homeless Special Needs
	Goal Description	<p>The County’s objectives are:</p> <p>Five year: Develop 15 units of housing for persons with special needs.</p> <p>Annual: Lehigh County did not fund any projects during this program year.</p>

9.	Goal Name	CD-1 Public Facilities and Infrastructure
	Goal Description	<p>The County’s objectives are:</p> <p>Five Year: Assist municipalities with projects of community significance</p> <ul style="list-style-type: none"> • Clearance and demolition (2 units) • Sewer, water improvements (8 projects) • Storm sewer improvements (5 projects) • Sidewalk improvements, including handicap accessibility (10 projects) • Street improvements (5 projects) • Parks and recreation improvements (3 projects) <p>Annual:</p> <ul style="list-style-type: none"> • Sewer, water improvements (2 projects) • Sidewalk improvements, including handicap accessibility (5 projects) • Street improvements (3 projects)
10.	Goal Name	CD-2 Economic Development
	Goal Description	<p>The County’s objectives are:</p> <p>Five Year: Assist businesses to establish and grow in Lehigh County</p> <ul style="list-style-type: none"> • Provide loans to two (2) businesses • Promote façade improvements and downtown revitalization in borough and township business districts <p>Annual: Lehigh County did not fund any projects during this program year.</p>

11.	Goal Name	CD-3 Public Services
	Goal Description	<p>The County’s objectives are:</p> <p>Five Year: Assist human service organizations provide essential services to at-risk populations</p> <ul style="list-style-type: none"> • Homeless prevention services • Housing referral and counseling for the disabled • Literacy and English as a Second Language education • Subsistence services • Fair Housing outreach, education and advocacy <p>Annual: Assist human service organizations provide essential services to at-risk populations</p> <ul style="list-style-type: none"> • Homeless prevention services (30 persons) • Housing referral and counseling for the disabled (30 persons) • Literacy and English as a Second Language education (100 persons) • Subsistence services (64 persons) • Fair Housing outreach, education and advocacy (50 persons) • Career Counseling (20 persons)

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):

Lehigh County proposes to assist the following:

- **Extremely Low-Income** - 0 families
- **Low-Income** - 1 families
- **Moderate-Income** - 4 families

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AP-35 Projects – 91.220(d)**Introduction**

Listed below are the FY 2014 CDBG activities for Lehigh County.

#	Project Name
1.	Borough of Alburdis – Curb Cuts
2.	Borough of Coopersburg – Sanitary Sewer Rehabilitation
3.	Borough of Emmaus – Curb Cuts
4.	Borough of Fountain Hill – North Clewell Street Reconstruction and Curb Cuts
5.	Borough of Macungie – Curb Cuts
6.	Township of Salisbury –Waterline Replacement
7.	Borough of Slatington – East Washington Street Reconstruction and Curb Cuts
8.	Township of Whitehall – Iron Street Reconstruction
9.	County-wide Housing Rehab – Housing Rehabilitation Financing
10.	Catholic Charities – Self-sufficiency & Intervention Program
11.	Communities in Schools of the Lehigh Valley – School-to-Career Program
12.	Lehigh Valley Center for Independent Living – People Living in Accessible Community Environments (PLACE) Program
13.	Meals on Wheels of Lehigh County – Meal Preparation and Delivery
14.	North Penn Legal Services – LMI Legal Aide
15.	The Literacy Center – Adult Literacy Instruction
16.	Administration

Table 8 – Project Information

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

Rationale for funding activities were based on the eligibility of the activity, if it met a national objective, who are the beneficiaries of the activity, and evidence of the need in the community or by the agency/organization. Additional consideration was given based on the community's or the agency's/organization's past history of expenditure of the CDBG funds, the ability to leverage other funds for the activity, past performance outcomes, and whether the FY 2014 request was related to projects that if not funded, would result in a special assessment against low-income homeowners. Finally, a priority was given to activities based on the community or agency/organization's ability to complete the project in a timely manner.

Lehigh County allocated its FY 2014 CDBG funds to provide assistance with activities that met the underserved needs of the communities participating in the program. The projects that meet the HUD criteria for benefit to low- and moderate-income households are located in those census tracts or block groups that are defined as low/mod areas. In selecting projects, consideration was given to the communities with concentrations of racial or ethnic groups and disproportionate needs standards.

Lehigh County has established the following criteria when establishing priorities for CDBG projects:

- Meeting the statutory requirements of the CDBG program
- Meeting the needs of very-low and low- and moderate-income residents
- Focusing on low- and moderate-income areas or communities
- Coordinating and leveraging of resources
- Response to expressed needs
- Projects that would otherwise cause a special assessment to be levied against low- and moderate-income households
- Ability to complete the project in a timely manner

Lehigh County does not anticipate any obstacles in the performance of the FY 2014 CDBG activities. Affordable housing was identified as the largest underserved need in Lehigh County in the Five Year Consolidated Plan. Lehigh County is not a HUD entitlement community under the HOME program. Therefore, resources for housing activities are limited. The primary obstacle to meeting the underserved needs are the limited resources available to address the identified priorities in the County. Lehigh County will continue to partner with other agencies when feasible, to leverage resources and maximize outcomes in housing, community and economic development.

Projects

AP-38 Projects Summary

Project Summary Information

1.	Project Name	Borough of Alburdis – Curb Cuts
	Target Area	N/A
	Goals Supported	CD-1 Public Facilities and Infrastructure
	Needs Addressed	Non-Housing Community Development – CD
	Funding	CDBG: \$40,000
	Description	Curb cuts on Third Street @ \$5,000 per cut.
	Target Date	9/30/15
	Estimate the number and type of families that will benefit from the proposed activities	1 Public Facility
	Location Description	Third Street in the Borough of Alburdis.
	Planned Activities	N/A
2.	Project Name	Borough of Coopersburg – Sanitary Sewer Rehabilitation
	Target Area	N/A
	Goals Supported	CD-1 Public Facilities and Infrastructure
	Needs Addressed	Non-Housing Community Development – CD
	Funding	CDBG: \$100,000
	Description	Repair 15 manholes and 3,168 feet of main line pipe.
	Target Date	9/30/15
	Estimate the number and type of families that will benefit from the proposed activities	903 low- and moderate-income persons

	Location Description	C.T. 69.02, B.G. 2
	Planned Activities	N/A
3.	Project Name	Borough of Emmaus – Curb Cuts
	Target Area	N/A
	Goals Supported	CD-1 Public Facilities and Infrastructure
	Needs Addressed	Non-Housing Community Development – CD
	Funding	CDBG: \$40,000
	Description	Curb cuts on North 4 th and North 3 rd Street at \$4,102 per cut.
	Target Date	9/30/15
	Estimate the number and type of families that will benefit from the proposed activities	1 Public Facility
	Location Description	North 4 th and North 3 rd Street in Borough of Emmaus.
	Planned Activities	N/A
4.	Project Name	Borough of Fountain Hill – North Clewell Street Reconstruction and Curb Cuts
	Target Area	N/A
	Goals Supported	CD-1 Public Facilities and Infrastructure
	Needs Addressed	Non-Housing Community Development – CD
	Funding	CDBG: \$120,000
	Description	Reconstruction of North Clewell Street between Jeter and Delaware Streets, including 150 lineal feet of new curbs and 10 ramps.
	Target Date	9/30/15
	Estimate the number and type of families that will benefit from the proposed activities	2,266 low- and moderate-income persons
	Location Description	North Clewell Street between Jeter and Delaware Streets in the Borough of Fountain Hill.

	Planned Activities	N/A
5.	Project Name	Borough of Macungie – Curb Cuts
	Target Area	N/A
	Goals Supported	CD-1 Public Facilities and Infrastructure
	Needs Addressed	Non-Housing Community Development – CD
	Funding	CDBG: \$40,000
	Description	Curb cuts on Main Street between Chestnut and the railroad crossing.
	Target Date	9/30/15
	Estimate the number and type of families that will benefit from the proposed activities	1 Public Facility
	Location Description	Main Street between Chestnut and the railroad crossing in the Borough of Macungie.
	Planned Activities	N/A
6.	Project Name	Township of Salisbury – Waterline Replacement
	Target Area	N/A
	Goals Supported	CD-1 Public Facilities and Infrastructure
	Needs Addressed	Non-Housing Community Development – CD
	Funding	CDBG: \$150,000
	Description	Replacement of the 8” waterline along South Potomac Street from East Susquehanna Street to East Montgomery Street.
	Target Date	9/30/15
	Estimate the number and type of families that will benefit from the proposed activities	39 low- and moderate-income persons
	Location Description	South Potomac Street from East Susquehanna Street to East Montgomery Street in the Township of Salisbury.

	Planned Activities	N/A
7.	Project Name	Borough of Slatington – East Washington Street Reconstruction and Curb Cuts
	Target Area	N/A
	Goals Supported	CD-1 Public Facilities and Infrastructure
	Needs Addressed	Non-Housing Community Development – CD
	Funding	CDBG: \$75,421
	Description	Street reconstruction and curb cuts along East Washington from First Street to Fairview Street.
	Target Date	9/30/15
	Estimate the number and type of families that will benefit from the proposed activities	1,613 low- and moderate-income persons
	Location Description	East Washington from First Street to Fairview Street in the Borough of Slatington.
	Planned Activities	N/A
8.	Project Name	Township of Whitehall – Iron Street Reconstruction
	Target Area	N/A
	Goals Supported	CD-1 Public Facilities and Infrastructure
	Needs Addressed	Non-Housing Community Development – CD
	Funding	CDBG: \$85,000
	Description	Reconstruction of Iron Street from North 3 rd Street to dead end.
	Target Date	9/30/15
	Estimate the number and type of families that will benefit from the proposed activities	3,682 low- and moderate-income persons
	Location Description	Iron Street from North 3 rd Street to dead end in the Township of Whitehall.
	Planned Activities	N/A

9.	Project Name	County-wide Housing Rehab – Housing Rehabilitation Financing
	Target Area	N/A
	Goals Supported	H-1 Retain Existing Housing Stock
	Needs Addressed	Housing – H
	Funding	CDBG: \$150,000
	Description	Funding rehabilitation owner-occupied LMI properties. Program delivery is also included.
	Target Date	9/30/15
	Estimate the number and type of families that will benefit from the proposed activities	5 low- and moderate-income households
	Location Description	County-wide
	Planned Activities	N/A
10.	Project Name	Catholic Charities - Self-sufficiency & Intervention Program
	Target Area	N/A
	Goals Supported	HA-1 Homeless Prevention CD-3 Public Services
	Needs Addressed	Homeless – HA Non-Housing Community Development – CD
	Funding	CDBG: \$29,700
	Description	Rent and utility assistance along with case management for approximately 30 households.
	Target Date	9/30/15
	Estimate the number and type of families that will benefit from the proposed activities	30 low- and moderate-income households
	Location Description	County-wide

	Planned Activities	N/A
11.	Project Name	Communities in Schools of the Lehigh Valley - School-to-Career Program
	Target Area	N/A
	Goals Supported	CD-3 Public Services
	Needs Addressed	Non-Housing Community Development - CD
	Funding	CDBG: \$21,650
	Description	Provide 20 low-income students with career awareness, skill development and case management to prepare them for work post high school.
	Target Date	9/30/15
	Estimate the number and type of families that will benefit from the proposed activities	20 low- and moderate-income persons
	Location Description	County-wide
	Planned Activities	N/A
12.	Project Name	Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program
	Target Area	N/A
	Goals Supported	CD-3 Public Services
	Needs Addressed	Non-Housing Community Development – CD
	Funding	CDBG: \$20,400
	Description	Housing counseling to 30 clients who are homeless or near homeless, along with short-term rental assistance. Fair Housing Landlord education focused on disabilities.
	Target Date	9/30/15
	Estimate the number and type of families that will benefit from the proposed activities	30 low-income households

	Location Description	County-wide
	Planned Activities	N/A
13.	Project Name	Meals on Wheels of Lehigh County - Meal Preparation and Delivery
	Target Area	N/A
	Goals Supported	CD-3 Public Services
	Needs Addressed	Non-Housing Community Development – CD
	Funding	CDBG: \$20,000
	Description	Meals to homebound seniors and adults with disabilities, all with income below \$38,550.
	Target Date	9/30/15
	Estimate the number and type of families that will benefit from the proposed activities	64 low- and moderate-income persons
	Location Description	County-wide
	Planned Activities	N/A
14.	Project Name	North Penn Legal Services - LMI Legal Aide
	Target Area	N/A
	Goals Supported	CD-3 Public Services
	Needs Addressed	Non-Housing Community Development – CD
	Funding	CDBG: \$10,000
	Description	Advice, referrals, advocacy and some direct representation of LMI people being evicted, denied housing or who are forced to live in uninhabitable conditions.
	Target Date	9/30/15
	Estimate the number and type of families that will benefit from the proposed activities	50 low- and moderate-income persons
	Location Description	County-wide

	Planned Activities	N/A
15.	Project Name	The Literacy Center - Adult Literacy Instruction
	Target Area	N/A
	Goals Supported	CD-3 Public Services
	Needs Addressed	Non-Housing Community Development – CD
	Funding	CDBG: \$20,000
	Description	Adult Basic Education, GED instruction and ESL classes for 100 residents.
	Target Date	9/30/15
	Estimate the number and type of families that will benefit from the proposed activities	100 low- and moderate-income persons
	Location Description	County-wide
	Planned Activities	N/A
16.	Project Name	Administration
	Target Area	N/A
	Goals Supported	N/A
	Needs Addressed	N/A
	Funding	CDBG: \$230,542
	Description	Oversight, management, and administration of the CDBG Program.
	Target Date	9/30/15
	Estimate the number and type of families that will benefit from the proposed activities	57,850 low- and moderate-income persons
	Location Description	County-wide
	Planned Activities	N/A

AP-50 Geographic Distribution – 91.220(f)

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

The following information provides a profile of the population, age, and racial/ethnic composition of Lehigh County. This information was obtained from the U.S. Census Bureau American Factfinder website, <http://factfinder.census.gov>. The 2008-2012 American Community Survey 5-Year Estimates were used to analyze the social, economic, housing, and general demographic characteristics of Lehigh County. The 5-year estimates are the most recent data available for the County. The 2010 U.S. Census data is included where possible.

Lehigh County's overall population:

- Between 1980 and 2010, the population increased by approximately 28.3%, rising from 272,349 to 349,497.
- Since 2000, the population has increased 11.9%, which is expected to continue.

Lehigh County's age of population:

- Median age in Lehigh County is 39.3 years old.
- Youth under age 18 account for 20.6% of the population.
- Adults between the ages of 35 and 60 account for 35.2% of the population.

Racial/ethnic composition of Lehigh County from the 2010 U.S. Census:

- 79.1% are White
- 18.8% are Hispanic
- 6.1% are Black or African American

The median income for a family of four (4) in the **Allentown-Bethlehem-Easton, PA HUD Metro FMR Area** is \$68,800 for 2014. At the time of the 2008-2012 American Community Survey, median household income in Lehigh County was \$54,645 which was higher than the Commonwealth of Pennsylvania (\$52,267).

In Lehigh County, the overall percentage of low- and moderate-income (LMI) persons was 30.49% in 2010, while the First Quartile Low/Mod rate established by HUD is 42.41%. A total of 13 census tract and block groups across the County had a majority (i.e., more than 50.0%) of persons with incomes at or below 80% of the Median Family Income (MFI). A total of 33 block groups across the County had a Low/Mod rate equal to or greater than the First Quartile Low/Mod rate of 42.41%.

According to the U.S. Labor Department, the preliminary unemployment rate for Lehigh County in April 2014 was 5.4% compared to a preliminary rate of 5.7% for the Commonwealth of Pennsylvania; these rates are down from their respective April 2013 rates of 7.6% and 7.2%. The seasonally adjusted national unemployment rate is 6.3%, also down from the 2013 rate, 7.5%.

Lehigh County will provide CDBG funds to activities principally benefitting low/mod income persons in the participating jurisdiction of the Urban County. Such assistance is not directed to any specific geographic area, but based on income benefit.

Areas of primary concern are those where race and income concentrations overlap. Low-income census tracts with concentration of Hispanic residents occur in: Whitehall Township, Catasauqua Borough and Hanover Township.

Geographic Distribution

Target Area	Percentage of Funds
N/A	NA

Table 9 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Rationale for funding activities were based on the eligibility of the activity, the activity must meet a national objective, and evidence must be presented of the need in the community or by the agency’s/organization. Additional consideration was given based on the community’s or the agency/organization’s past history of expenditure of the CDBG funds, the ability to leverage other funds for this activity, and whether the FY 2014 request was related to projects that if not funded, would result in a special assessment against low-income homeowners. Finally, a high priority was given to activities based on the community’s or agency’s/organization’s ability to complete the project in a timely manner. Lehigh County will provide CDBG funds to activities principally benefitting low/mod income persons in the participating jurisdictions of the Urban County. Such assistance is not directed to any specific geographic area, but based on income benefit.

Lehigh County has established the following criteria when establishing priorities for CDBG projects:

- Meeting the statutory requirements of the CDBG program
- Meeting the needs of very-low and low- and moderate-income residents
- Focusing on low- and moderate-income areas or communities
- Coordinating and leveraging of resources
- Response to expressed needs
- Projects that would otherwise cause a special assessment to be levied against low- and moderate-income households
- Ability to complete the project in a timely manner

Lehigh County does not anticipate any obstacles in the performance of the FY 2014 CDBG activities. Affordable housing was identified as the largest underserved need in Lehigh County in the Five Year Consolidated Plan. Lehigh County is not a HUD entitlement jurisdiction under the HOME program. Therefore, resources for housing activities are limited. The primary obstacle to meeting the underserved needs is the limited resources available to address the identified priorities in the County. Lehigh County

will continue to partner with other agencies when feasible to leverage resources and maximize outcomes in housing and community development needs.

Discussion

The geographic locations and the public benefit for the FY 2014 CDBG Activities/Projects are as follows:

- **Borough of Alburtis - Curb Cuts** - C.T. 63.02, B.G. 1; Low/Mod Clientele (LMC)
- **Borough of Coopersburg - Sanitary Sewer Rehabilitation** - C.T. 69.02, B.G. 2; Low/Mod Area (LMA)
- **Borough of Emmaus - Curb Cuts** - Borough-wide; Low/Mod Clientele (LMC)
- **Borough of Fountain Hill - North Clewell Street Reconstruction and Curb Cuts** - C.T. 68, B.G. 1 and 2; Low/Mod Area (LMA)
- **Borough of Macungie - Curb Cuts** - Main Street from Chestnut Street to railroad crossing; Low/Mod Clientele (LMC)
- **Township of Salisbury - Waterline Replacement** - C.T. 67.01, B.G. 4; Low/Mod Area (LMA)
- **Borough of Slatington - East Washington Street Reconstruction and Curb Cuts** - C.T. 51, B.G. 2; Low/Mod Area (LMA)
- **Township of Whitehall - Iron Street Reconstruction** - C.T. 56.02, B.G. 3; Low/Mod Area (LMA)
- **County-wide Housing Rehab** - County-wide; Low/Mod Housing (LMH)
- **Catholic Charities - Self-sufficiency & Intervention Program** - County-wide; Low/Mod Clientele (LMC)
- **Communities in Schools - School-to-Career Program at Whitehall-Coplay High School** - Whitehall-Coplay High School; Low/Mod Clientele (LMC)
- **Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program** - County-wide; Low/Mod Clientele (LMC)
- **Meals on Wheels of Lehigh County - Meal Preparation and Delivery** - County-wide; Low/Mod Clientele (LMC)
- **North Penn Legal Services - LMI Legal Aide** - County-wide, Low/Mod Clientele (LMC)
- **The Literacy Center - Adult Literacy Instruction** - County-wide, Low/Mod Clientele (LMC)
- **Administration** - County-wide

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Lehigh County will utilize its CDBG funds to rehabilitate and support the construction of new affordable housing units. The one year goals for affordable housing in Lehigh County for FY 2014 are as follows:

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	35
Special-Needs	0
Total:	35

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	30
The Production of New Units	0
Rehab of Existing Units	5
Acquisition of Existing Units	0
Total:	35

Table 11 - One Year Goals for Affordable Housing by Support Type

Discussion

During the FY 2014 CDBG program year, Lehigh County will not fund any projects that support the production of new units, or acquisition of existing units. In addition, the County does not have any projects that are dedicated to homeless and special-needs households. All the projects are open to all income eligible residents of the County.

Lehigh County will assist Catholic Charities – Self-sufficiency & Intervention Program. This program will assist thirty (30) households with emergency subsistence payment which include rent and utilities for up to three (3) months.

Lehigh County will continue to fund the County-wide Housing Rehabilitation Program (CWHRP) for owner occupied housing, which is anticipated to help five (5) owner occupied households.

The Lehigh County Affordable Housing Trust fund will provide approximately \$350,000 toward housing activities in 2014. Eligible activities include using the revenues as the local matching funds to secure HOME funds from the State, construction or rehabilitation financing, housing related services, match for other State or Federal funds, and supporting first-time homebuyer second mortgage programs.

DRAFT

AP-60 Public Housing – 91.220(h)

Introduction

The Lehigh County Housing Authority (LCHA) aims to address the needs of the extremely low-income, very low-income, and lower-income residents of Lehigh County. The mission of the Lehigh County Housing Authority is to provide affordable housing in the most efficient and effective manner to qualified individuals in accordance with the rules and regulations prescribed by the U.S. Department of Housing and Urban Development, the Commonwealth of Pennsylvania, the County of Lehigh and/or any other entity providing funding for affordable housing programs. This is done through LCHA assisting individuals and families through its public housing communities and Section 8 Housing Choice Vouchers. The Housing Authority promotes homeownership through its Family Self-Sufficiency Program.

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

Each year, the Lehigh County Housing Authority (LCHA) receives an allocation of funds from HUD under the Capital Fund Program to undertake physical improvements. In addition, the LCHA receives operating subsidies to offset the operating deficits associated with public housing units and to carry out maintenance. The Lehigh County Housing Authority estimates that it will receive \$288,614 under a HUD Capital Fund grant for FY 2014. The FY 2014 allocation will be used for the following activities:

• Operations	\$ 28,861.00
• Administration	\$ 28,861.00
• Fees and Costs	\$ 25,000.00
• Dwelling Structures	\$ 195,000.00
• Contingency	\$ 10,892.00
Total:	\$288,614.00

The Lehigh County Housing Authority (LCHA) maintains 289 units of public housing and has a 100% occupancy rate. The public housing authority unit waiting list for 2-bedrooms and 3-bedrooms is closed and has been closed since 2011. The waiting list for 225 senior units remains open. LCHA has 1,230 Section 8 Housing Choice Vouchers, with approximately 300 individual households on the waiting list, as of June 2014. The Section 8 Housing Choice waiting list has been closed since 2010.

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

Lehigh County supports the Housing Authority's efforts to work with tenants of public housing and Section 8 Housing Choice Vouchers to achieve self-sufficiency. There are no joint projects planned for the 2014 program year.

Family Self-Sufficiency (FSS) programs are provided to Section 8 Housing Choice Voucher holders and public housing tenants. FSS program residents work with a case manager to develop goals that will, over

a five (5) year period, lead to self-sufficiency. These goals may include education, specialized training, job readiness, job placement activities, and career advancement objectives. The goals for each participating family member are set out in Individual's Training and Service Plan. There are 50 families participating, and all are Section 8 voucher holders. In addition, there is the Family Savings Account program which is available to residents who participate in FSS. This program enables families to save funds to help with larger purchases, such as education or homeownership.

The Lehigh County Housing Authority has residents living in its public housing communities as representatives to review the Annual Action Plan. The LCHA senior citizen developments in both Emmaus and Slatington have active resident advisory boards that focus on social programs in these communities.

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

The Lehigh County Housing Authority is not designated as "troubled" by HUD and is performing satisfactorily according to HUD guidelines and standards.

Discussion

Not applicable.

DRAFT

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

Introduction

Lehigh County is part of the Northeast Pennsylvania Regional Continuum of Care administered by the Northeast Regional Housing Advisory Board (NE-RHAB). The region is made up of twelve (12) counties which include: Lehigh, Northampton, Schuylkill, Carbon, Monroe, Pike, Wayne, Susquehanna, Wyoming, Sullivan, Bradford, and Tioga Counties. In FY 2013, the NE-RHAB received funding for thirty-three (33) renewals totaling \$4,875,397 for support services, permanent supportive housing, and transitional housing projects throughout the region. HUD will again contract with these agencies during the FY 2014 program year.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

During this program year Lehigh County will be applying on the behalf of shelter and service providers to the PA DCED for Emergency Solutions Grant (ESG) funds.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Northeast Pennsylvania Regional Continuum of Care completes a regular “Point In Time Survey” each January to determine the number of homeless individuals and families in the Northeast Pennsylvania Region. Based on the “Point In Time Survey,” conducted during January 2014 the following numbers of homeless persons were reported:

- **Unsheltered** - 128 individuals, 9 families with children, and 0 children only
- **Transitional Housing** - 100 individuals, 288 families with children, and 0 children only
- **Emergency Shelter** - 218 individuals, 164 families with children, and 2 children only

The shelter and transitional housing in Lehigh County include:

- Community Action Committee of the Lehigh Valley - Sixth Street Shelter (Emergency Shelter)
- Community Action Committee of Lehigh Valley - Turner Street Apartments (Transitional Housing)
- Salvation Army Emergency Shelter (Emergency Shelter)
- Salvation Army Transitional Shelter (Transitional Housing)
- Allentown Rescue Mission (Emergency Shelter)
- Allentown Rescue Mission Christian Living and Values Transitional Program (Transitional Housing)
- Turning Point of the Lehigh Valley (Domestic Violence) (Transitional Housing)
- The Program for Women and Families, Inc. (Transitional Housing)
- Valley Youth House (Emergency Shelter)
- Valley Youth House - Maternity Group Home (Transitional Housing)

- Valley Youth House - Supportive Housing for Families (Transitional Housing)
- Valley Youth House - Supportive Housing for Youth (Transitional Housing)

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

Finding availability and affordable units are a major challenge most households face in their efforts to move from a shelter or transitional housing, to permanent housing. Housing supply is limited and is often priced higher than most housing which, the household can afford. Affordable units may not be safe or meet the minimum housing code standards. The Lehigh County continues to encourage the development of affordable housing. The NE-RHAB encourages the shelters and the transitional housing providers to access the listing of affordable units on Pennsylvania Housing Finance Agency's (PHFA) housing locator website. The NE-RHAB is going to start to track the length of time households remain homeless and work to reduce that amount of time. The RHAB hopes to partner with housing authorities in the region to give preference to homeless families. They also plan to address employment and training opportunities to increase the income of homeless individuals and households before they leave the shelters or transitional housing.

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

The NE-RHAB is participating with other state CoCs through the PA Homeless Steering Committee to develop partnerships with state agencies that operate programs that discharge individuals to homelessness. Progress has been made with several agencies. Discharge planning by youth serving agencies includes steps to prepare youth for discharge from foster care and penal institutions. Mental health discharge is coordinated with the County Office of Mental Health. The departments of Corrections and Public Welfare are working to implement a new protocol to ensure that those leaving penal institutions are enrolled in Medical Assistance through the Pennsylvania COMPASS. This process will tie into food stamps and cash assistance. Providing housing and supportive services to those discharged from health care facilities is more difficult due to the special needs and short time frame involved. The PA Homeless Steering Committee is working with the Department of Health's Division of Acute and Ambulatory Care to research and establish protocols.

Coordination of services and local advocacy ensures that families that are already enrolled in one system of care are properly referred to other agencies providing appropriate services. The implementation of the 2-1-1 system will help expand the degree of coordination.

Lehigh County is using FY 2013 CDBG funds to fund Catholic Charities - Self-Sufficiency & Intervention Program in the amount of \$29,700 to assist thirty (30) households. This program provides counseling, short-term rent, and utility payments that prevent homelessness. Lehigh County, through its various human services programs, provides support to all the categories of non-homeless special needs populations.

The Lehigh County Department of Human Services provides a wide range of programs for its elderly, substance abusers, people with mental health and intellectual disabilities, children and youth and veterans. The County during this program year will not be using FY 2014 CDBG funds on these needs, but the County is addressing these needs to the extent possible, using County and State grant funds.

Discussion

Not Applicable.

DRAFT

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

Introduction

In August 2009, Lehigh County prepared and submitted to HUD an Analysis of Impediments to Fair Housing Choice. The Analysis of Impediment identified the following impediments and strategies:

Impediment # 1: Increase and Enhance Fair Housing Education and Outreach

1. Facilitate fair housing training for real estate sales persons, municipal officials and planners, landlords, low-income housing developers, housing authority staff, and local mortgage lenders.
2. Make presentations annually to local churches, soup kitchens, seniors, housing authority residents and/or nonprofit organizations on fair housing issues.
3. Develop a webpage on the County website dedicated exclusively to fair housing issues. Add the fair housing logo to all federal program materials.
4. Development of an up-to-date, centralized housing database for Lehigh County on a Lehigh County Community Development Office website.
5. Continue to make referrals to the Pennsylvania Human Relations Commission and U.S. Department of HUD in instances of discrimination.
6. Disseminate current information on Fair Housing Rights in the form of posters and pamphlets throughout Lehigh County. In addition, utilize public service announcements on cable television. Notify local municipalities of Zoning issues that may impact housing choice. Post HUD's Spanish-language fair housing video on the county's website.
7. Appoint a Fair Housing Officer for Lehigh County.

Impediment # 2 Continue Support of Affordable Housing Programs

1. Continue the commitment to affordable housing activities (rehabilitation, land banking). These activities provide a valuable opportunity to improve housing choice for members of the protected classes who are most often low- and moderate-income households.
2. Ensure that housing units rehabilitated or constructed with Federal funds comply with ADA requirements and encourage visitable units beyond the minimum requirements.
3. Expand accessibility requirements to universal design for all housing projects financed with Federal funds.
4. Support the initiatives of housing providers who work to provide affordable housing for low-income and disabled households.
5. Encourage development of affordable rental housing realizing that not all households should be owners and that decent rental housing stabilizes neighborhoods and creates new homeownership opportunities by moving renters away from single-family homes.
6. Adopt a fair housing resolution to publicly advocate for fair housing choice.

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

return on residential investment

North Penn Legal Services (NPLS) is a sub-recipient of FY 2014 CDBG fund from Lehigh County. NPLS is funded as a public service activity and provides legal aid related to affordable housing, serving low- and moderate-income residents living in Lehigh County outside of Allentown and Bethlehem. NPLS staff provides assistance to residents who face eviction, are denied housing, or are forced to live in uninhabitable conditions. This activity is conducted through workshops held at local social service agencies and in mobile home parks. Information on foreclosures, consumer issues, and fair housing is also provided to the residents of Lehigh County.

In addition, NPLS monitors housing practices and counsels victims of discrimination. NPLS policies and activities promote the awareness of fair housing requirements. They provide consultation to developers and municipalities to ensure that rental and for-sale units are marketed in accordance with the affirmative marketing rules of the U.S. Department of Housing and Urban Development. NPLS ensures that all housing programs and services provided by Lehigh County, its municipalities, and NPLS itself, are administered in a way that promotes fair housing on the basis of race, national origin, religion, gender, disability, and familial status. NPLS fundamental mission to increase access to affordable housing for all persons.

The Community Action Committee of Lehigh Valley (CACLV) implements the Community Action Financial Service Program, which is going to be funded by the Affordable Housing Trust Funds. The program provides homebuyer education, counseling, foreclosure prevention and recovery counseling to LMI persons living within the targeted area of Lehigh County. These areas include Whitehall, Coopersburg, Orefield, Emmaus, Fountain Hill, Coplay, and Slatington. Program outreach is conducted in all of these areas. In addition to the housing counseling services provided to income-eligible persons, one (1) home ownership seminar will be conducted with the targeted areas.

Lehigh Valley Center for Independent Living (CIL) receives CDBG funds to carry out public service activities. The FY 2014 CDBG funds will be used to provide housing location assistance to persons with disabilities. Services included case management, housing search, placement, and specialized support services.

Discussion

The Lehigh Valley Economic Development Corporation (LVEDC) received an award of \$2.3 million from the Sustainable Communities Regional Planning Grant from HUD. Eleven (11) agencies came together to apply for this grant through the U.S. Department of Housing and Urban Development (HUD). The Planning Grant was made possible through the Federal Office of Sustainable Communities, which is a collaboration among the Department of Housing and Urban Development (HUD), U.S. Department of Transportation, and the U.S. Environmental Protection Agency (EPA). These agencies formed the Lehigh Valley Sustainability Consortium (LVSC). The members of the LVSC are:

1. Lehigh County Department of Community and Economic Development
2. Northampton County Department of Community and Economic Development
3. Lehigh Valley Planning Commission
4. Lehigh and Northampton Transportation Authority
5. Community Action Committee of the Lehigh Valley
6. The Wildlands Conservancy
7. Lehigh Valley Economic Development Corporation
8. Renew Lehigh Valley
9. City of Allentown
10. City of Bethlehem
11. City of Easton

Lehigh Valley Sustainability Consortium (LVSC) hired an independent consulting firm to complete the Regional Analysis of Impediments to Fair Housing Choice. The independent consulting firm began the process in December 2012. From December 2012 through June 2013, the first Phase - Community Input Activities: Data Collection & Interviews was completed. The second Phase - Data Analysis and drafting the AI was from February 2013 through June 2013. The final Phase - Presentation and Approval of the Regional AI was supposed to be completed by September 2013. The Draft Regional AI has not been approved by all of the member jurisdictions. It should be revised and submitted to HUD in the Fall of 2014.

DRAFT

AP-85 Other Actions – 91.220(k)

Introduction

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

Actions planned to address obstacles to meeting underserved needs

Despite efforts made by Lehigh County and social service providers in the County, a number of significant obstacles to meeting underserved needs remain. Funding becomes the greatest obstacle for Lehigh County to meet its underserved needs. Insufficient funding lessens the ability to fund many worthwhile public service programs, activities, agencies, and the needs of local municipalities. Lehigh County will use its CDBG funds to provide assistance to activities that meet the underserved needs of the communities participating in the program. The most difficult obstacle to meeting the needs for affordable housing is a considerable lack of public and private finances to fully address the priorities identified in the Five-Year Strategic Plan. Building the organizational infrastructure to undertake projects and programs that rehabilitate and expand the housing supply is also challenging. In the Lehigh Valley Housing Needs Assessment, the following findings were identified:

- There are opportunities available for more collaborative initiatives between for-profit developers and non-profit organizations in the Lehigh Valley. By partnering with an experienced for-profit developer, a smaller non-profit 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 multifamily zoning designations, as well as eliminate unnecessary and excessive development standards for multi-family housing.
- Active and productive non-profit 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 Affordable Housing Trust Fund resources) would enable non-profits to seek out additional development opportunities and fully investigate the financial feasibility of potential projects early on.

The Lehigh Valley Planning Commission has developed various model zoning and land use controls to encourage affordable housing. The task remains to incorporate these into the local municipal ordinances.

Lehigh County has an Affordable Housing Trust Fund. The fund provides support for affordable housing

projects in the County.

Actions planned to foster and maintain affordable housing

Lehigh County, under its FY 2014 CDBG Program, proposes to foster and maintain affordable housing through the following Five Year goals and strategies:

GOAL: HOUSING - H

H-1: Retain Existing Housing Stock - rehabilitate and stabilize the housing stock of both owner and renter occupied housing.

Lehigh County funded the following projects:

- **County-wide Housing Rehab** - funding for rehabilitation of owner-occupied low- and moderate-income properties. Five (5) households will be assisted.

H-2: Development of Affordable Housing - Provide financial and technical assistance for the development of new housing and the rehabilitation of vacant housing. Such housing will provide opportunities for very low-income and low-income renters and low-income to moderate income homebuyers.

Lehigh County did not fund any projects during this program year.

H-3: Homebuyer's Assistance - Provide down payment and closing cost assistance for low- and moderate-income homebuyers.

Lehigh County did not fund any projects during this program year.

Actions planned to reduce lead-based paint hazards

Lead-based paint poses a particular hazard to children under the age of six, and is the focus of efforts by the U.S. Department of Housing and Urban Development (HUD) to raise awareness of the problem and mitigate or eliminate the hazard. Lead-based paint was banned in 1978, but housing constructed prior to that time typically contains lead-based paint to some degree. Lead hazards are addressed during housing rehabilitation efforts. All homes that receive rehabilitation assistance are tested for the presence of lead-based paint. When evidence of the paint is found, the paint surfaces are removed or the material is encapsulated to prevent exposure.

The new EPA guidelines for renovation, paint and repair, effective April 22, 2010, require that all contractors notify owners of properties constructed prior to 1978 of the potential for lead-based paint hazard and to perform work in a lead safe manner. Contractors must be trained and registered with EPA to do work in older homes that disturbs painted surfaces. Local building code officers will be made

aware of these requirements. Contractors must provide appropriate notice to owners of properties that will be rehabilitated about the dangers of lead-based paint.

Actions planned to reduce the number of poverty-level families

Approximately 12.9% of Lehigh County's residents live in poverty, which is less than the Commonwealth of Pennsylvania where 13.1% of residents live in poverty. Female-headed households with children are particularly affected by poverty at 40.4%. This information is taken from the U.S. Census "2008-2012 ACS Five-Year Estimates." The County's goal is to reduce the extent of poverty by actions the County can control and through work with other agencies/organizations.

Poverty is related to education, job training, and employment. Lehigh County remains committed to addressing the needs of its residents who live at or below the poverty level. The presence of poverty and the related social and economic problems can be a destabilizing element in communities.

In Lehigh County, the 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, benefit entitlement assistance, home weatherization to reduce utility costs, furniture and household goods, alcohol and mental health counseling, a Family Savings Account Program, foreclosure mitigation counseling, child care, transportation to work for up to six (6) months and assistance in purchasing a dependable vehicle, and other varied programs that empower low-income households by assisting them to develop the skills needed for independent living.

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 and to promote job creation, Lehigh County administers various programs and supports agencies for economic development:

- 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.

Actions planned to develop institutional structure

The primary responsibility for the administration of the Annual Action Plan is assigned to the Lehigh County Department of Community and Economic Development. This agency coordinates activities among local municipal governments, public and private organizations, in their efforts to implement different elements and to realize the prioritized goals of the Annual Action Plan.

In order to address the County's housing and community development needs, the County has established an extensive public-private partnerships aimed at revitalization in the County. In 2014, the partnership includes the following agencies:

- North Penn Legal Services
- Catholic Charities, Diocese of Allentown
- Carbon Lehigh Intermediate Unit 21
- CIS Career Services At Whitehall High School
- Lehigh County Conference of Churches
- Lehigh Carbon Community College
- Meals on Wheels of Lehigh County, Inc.
- Lehigh Valley Center for Independent Living (LVCIL)
- New Bethany Ministries
- Northeast Regional Housing Advisory Board (NE-RHAB)
- Lehigh Valley Community Land Trust (LVCLT).

Lehigh County consults with business and civic leaders during its planning process for the preparation of its Annual Action Plan and Five Year Consolidated Plan. This includes, but is not limited to, the following:

- The Greater Lehigh Valley Chamber of Commerce
- Community Action Committee of Lehigh Valley
- Local elected officials.

The Department of Community and Economic Development has been working closely with CACLV and the Lehigh Valley Community Land Trust (LVCLT). The LVCLT plays a major role in the implementation of the NSP I program.

The County hired a third-party vendor, Community Grants and Planning & Housing, LLC (CGP&H) to implement its County-wide housing rehabilitation program. CGP&H is working with the County to ensure that the housing rehabilitation program provides assistance to lower income homeowners.

Lehigh County is part of the Northeast Regional Housing Advisory Board (NE-RHAB). To promote a more local approach, the City of Allentown has initiated a planning process that will require regional support. Lehigh County has been supportive of this initiative.

The Lehigh Valley Planning Commission will also be the entity responsible for performing project oversight required under Executive Order 12372. HUD has acknowledged that the Commonwealth of

Pennsylvania no longer has a standing committee for this required function and has asked jurisdictions instead to utilize committees under Section 204 of the Demonstration Cities and Metropolitan Development Act of 1966. This function will be carried out by the Lehigh Valley Planning Commission.

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

The primary responsibility for the administration of the Annual Action Plan is assigned to Lehigh County Department of Community and Economic Development. This agency will coordinate activities among local municipalities, public and private organizations, in their efforts to implement different elements and to realize the prioritized goals of the Annual Action Plan. The County is committed to continuing its participation and coordination with public, housing, and social service organizations. The County solicits applications for CDBG funds. In addition, the County sends out applications to a list of agencies, organizations, housing providers, and local municipalities that have previously submitted an application or which have expressed an interest in submitting an application. The applications are reviewed by the Department of Community and Economic Development staff and they discuss any questions with the applicant.

Lehigh County will continue efforts to enhance coordination between agencies by creating partnerships such as in the implementation of the Section 3 and MBE-WBE outreach initiatives. The Section 3 outreach effort will partner with the CareerLINK, the Lehigh County Housing Authority and CACLV to identify Section 3 individuals and businesses and to provide feedback on available job opportunities. Such partnerships help to develop a better understanding of community needs.

The Affordable Housing Task Force is a regional group that includes Lehigh County. This group is developing the tools for and interest of the local municipalities for inclusionary zoning, cottage housing development, density bonuses, and transit oriented development.

The Lehigh Valley was awarded a Sustainable Communities Regional Planning Grant from HUD. Through this effort, the Five-Year Strategic Plan and the larger regional plan is being prepared. As described in *Prosper Lehigh Valley*, a blog on economic development in the Lehigh Valley, eleven agencies came together to apply for this grant through the U.S. Department of Housing and Urban Development (HUD). This grant was one of a few programs that are made possible through the Federal Office of Sustainable Communities, a historic collaboration among HUD, U.S. Department of Transportation, and the U.S. Environmental Protection Agency. Locally, the eleven (11) partners applied through the Lehigh Valley Economic Development Corporation as the Lehigh Valley Sustainability Consortium (LVSC).

The members of the LVSC are:

1. Lehigh County Department of Community and Economic Development
2. Northampton County Department of Community and Economic Development
3. Lehigh Valley Planning Commission
4. Lehigh and Northampton Transportation Authority

5. Community Action Committee of the Lehigh Valley
6. The Wildlands Conservancy
7. Lehigh Valley Economic Development Corporation
8. Renew Lehigh Valley
9. City of Allentown
10. City of Bethlehem
11. City of Easton

Discussion

Monitoring

Performance monitoring is an important component in the long-term success of the County's Community Development Block Grant Program. The County, through the Department of Community and Economic Development (DCED), has developed standards and procedures for ensuring that the recipients of CDBG funds meet the regulations and that funds are disbursed in a timely fashion. The County has promulgated sub-recipient monitoring procedures and developed checklists to ensure that each activity is completed in a manner consistent with the requirements of the Community Development Block Grant Program. Municipal sub-recipients are desk audited through submission of quarterly and annual reports.

The DCED staff regularly monitors the progress of every activity to ensure timeliness. Municipal projects and sub-recipients are held to a performance schedule through contract obligations. When these milestones are not met, the DCED staff works closely with the municipality to get the project back on track or reallocate the funds.

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

- Objectives of the National Affordable Housing Act are met,
- Program activities are progressing in compliance with the specifications and schedule for each program, and
- 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 sub-recipient 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 quarterly basis, and a review of audits on an annual basis. Monitoring will also occur through on-site monitoring visits. These visits will occur as necessary, but will be conducted at least once a year.

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 and submit an audit.

There are monitoring responsibilities that go beyond the time of completion of various activities. The overall performance of the program relative to the Five-Year Strategic Plan goals is monitored at least bi-annually through the selection of the annual activities and again during the preparation of the Comprehensive Annual Performance and Evaluation Report (CAPER). If it appears that proposed goals are not being addressed, the County will re-evaluate the goals, project performance and determine the course of action needed to bring the program into compliance.

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Program Specific Requirements

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

Introduction

Lehigh County receives an annual allocation of CDBG funds. The County does not expect to generate program income from any CDBG funded activities in FY 2014. The County-wide Housing Rehabilitation program has a five (5) year forgivable loan period. However, should the owner of the residence sell, move, or the residence is no longer its principal residence, the owner would have to repay a prorated portion of the loan to the County. Repayment is based on the time the homeowner resided in the residence during the lien period. Since the County receives a CDBG Federal allocation, the questions below have been completed, as applicable.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$0.00
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	\$0.00
3. The amount of surplus funds from urban renewal settlements	\$0.00
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	\$0.00
5. The amount of income from float-funded activities	\$0.00
Total Program Income:	\$0.00

Other CDBG Requirements

1. The amount of urgent need activities	\$0.00
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100%

Discussion

Not applicable.

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SF 424 FORM

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SF 424

The SF 424 is part of the CPMP Annual Action Plan. SF 424 form fields are included in this document. Grantee information is linked from the 1CPMP.xls document of the CPMP tool.

SF 424

Complete the fillable fields (blue cells) in the table below. The other items are pre-filled with values from the Grantee Information Worksheet.

Date Submitted August 15, 2014	Applicant Identifier	Type of Submission	
Date Received by state	State Identifier	Application	Pre-application
Date Received by HUD	Federal Identifier	<input type="checkbox"/> Construction	<input type="checkbox"/> Construction
		<input type="checkbox"/> Non Construction	<input type="checkbox"/> Non Construction
Applicant Information			
Lehigh County		UOG Code	
Government Center		DUNS #: 07-361-8605	
17 South Seventh Street		Organizational Unit	
Allentown	Pennsylvania	Dept: Community & Economic Development	
18101	Country U.S.A.	Division	
Employer Identification Number (EIN):		Lehigh County	
23-1663078		Program Year Start Date (10/01)	
Applicant Type:		Specify Other Type if necessary:	
Local Government: County		Specify Other Type	
Program Funding		U.S. Department of Housing and Urban Development	
Catalogue of Federal Domestic Assistance Numbers; Descriptive Title of Applicant Project(s); Areas Affected by Project(s) (cities, Counties, localities etc.); Estimated Funding			
Community Development Block Grant		14.218 Entitlement Grant	
CDBG Project Titles: FY 2014 Community Development Block Grant Program for Lehigh County		Description of Areas Affected by CDBG Project(s)	
\$1,152,713.00 (CDBG Allocation)	\$Additional HUD Grant(s) Leveraged	Describe	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged	
\$Anticipated Program Income		Other (Describe)	
Total Funds Leveraged for CDBG-based Project(s)			
Home Investment Partnerships Program		14.239 HOME	
HOME Project Titles		Description of Areas Affected by HOME Project(s)	
\$HOME Grant Amount	\$Additional HUD Grant(s) Leveraged	Describe	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged	

\$Anticipated Program Income		Other (Describe)	
Total Funds Leveraged for HOME-based Project(s)			
Housing Opportunities for People with AIDS		14.241 HOPWA	
HOPWA Project Titles		Description of Areas Affected by HOPWA Project(s)	
\$HOPWA Grant Amount	\$Additional HUD Grant(s) Leveraged	Describe	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged	
\$Anticipated Program Income		Other (Describe)	
Total Funds Leveraged for HOPWA-based Project(s)			
Emergency Solutions Grants Program		14.231 ESG	
ESG Project Titles		Description of Areas Affected by ESG Project(s)	
\$ESG Grant Amount	\$Additional HUD Grant(s) Leveraged	Describe	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged	
\$Anticipated Program Income		Other (Describe)	
Total Funds Leveraged for ESG-based Project(s)			
Congressional Districts of:		Is application subject to review by state Executive Order 12372 Process?	
Applicant Districts: 15 th & 6 th	Project Districts: 15 th		
Is the applicant delinquent on any federal debt? If "Yes" please include an additional document explaining the situation.		<input checked="" type="checkbox"/> Yes	This application was made available to the state EO 12372 process for review on August 15, 2014 to the Local Planning Commission.
		<input type="checkbox"/> No	Program is not covered by EO 12372
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A	Program has not been selected by the state for review

Person to be contacted regarding this application		
Laurie	A.	Moyer
Grant & Housing Manager	Phone: 610-871-1964	Fax: 610-820-8257
lauriemoyer@lehighcounty.org	www.lehighcounty.org	Ms. Paulette Gilfoil
Signature of Authorized Representative		Date Signed: August 14, 2014

CERTIFICATIONS

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CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about –
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will -
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted:
 - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official

08/14/14

Date

County Executive
Title

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. **Overall Benefit.** The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s), (2015, 2016, and 2017), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

Compliance with Laws -- It will comply with applicable laws.

Signature/Authorized Official

08/14/14

Date

County Executive
Title

**OPTIONAL CERTIFICATION
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Signature/Authorized Official

Date

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

Government Center

17 South Seventh Street

Allentown, PA 18101

Check ___ if there are workplaces on file that are not identified here.

The certification with regard to the drug-free workplace is required by 24 CFR part 24, subpart F.

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

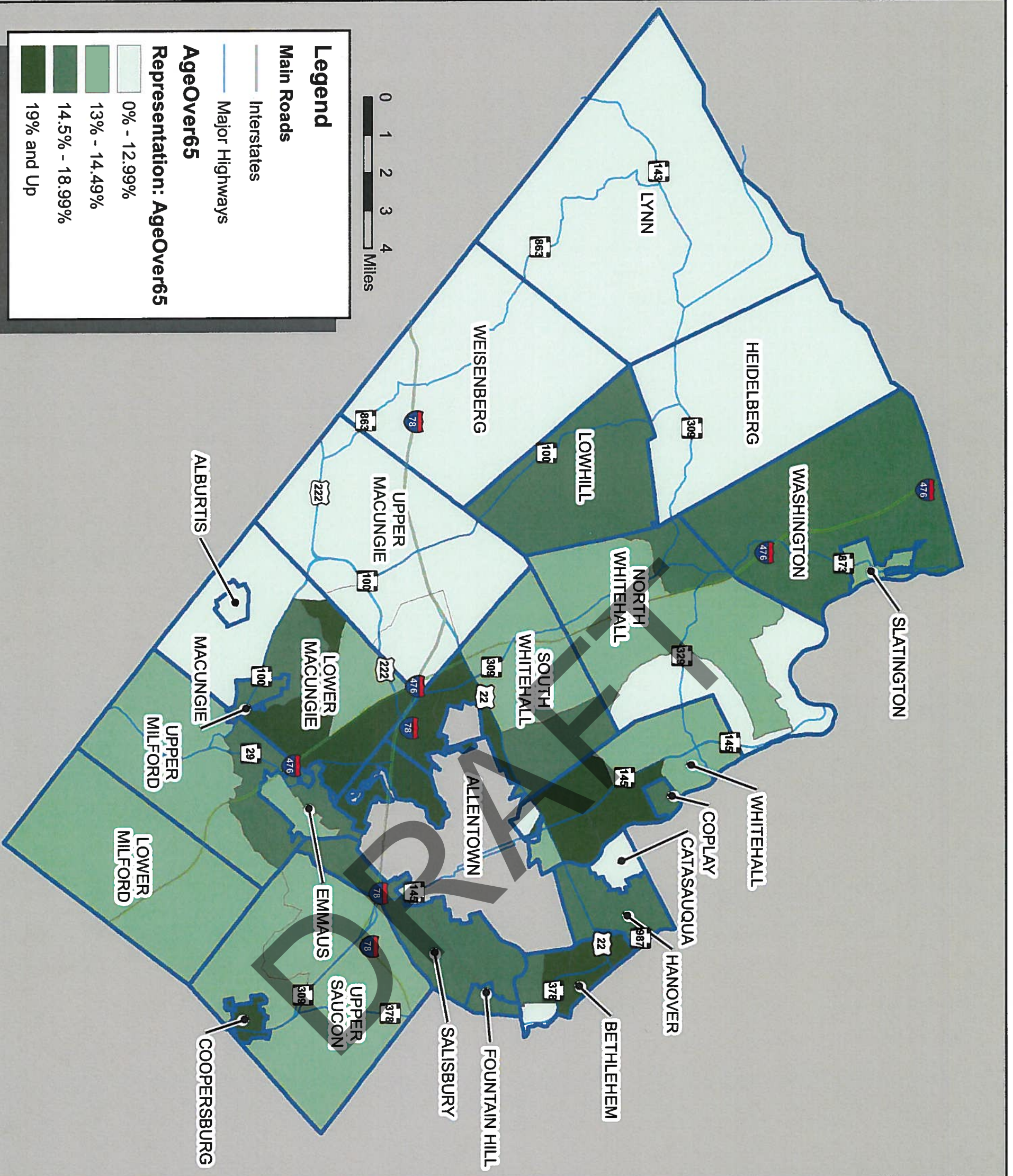
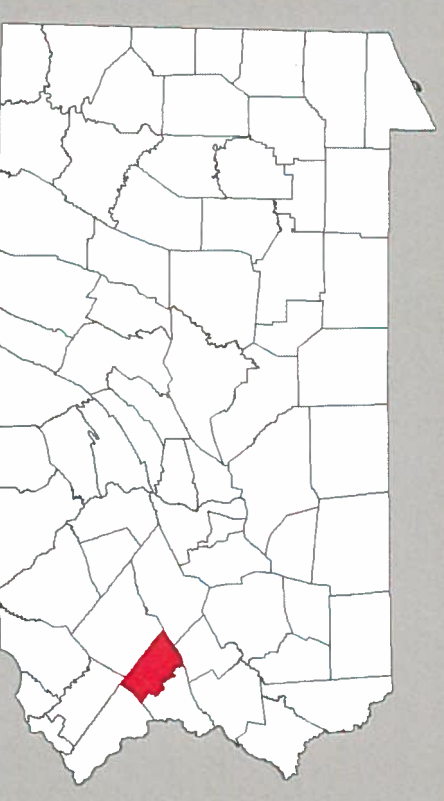
"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

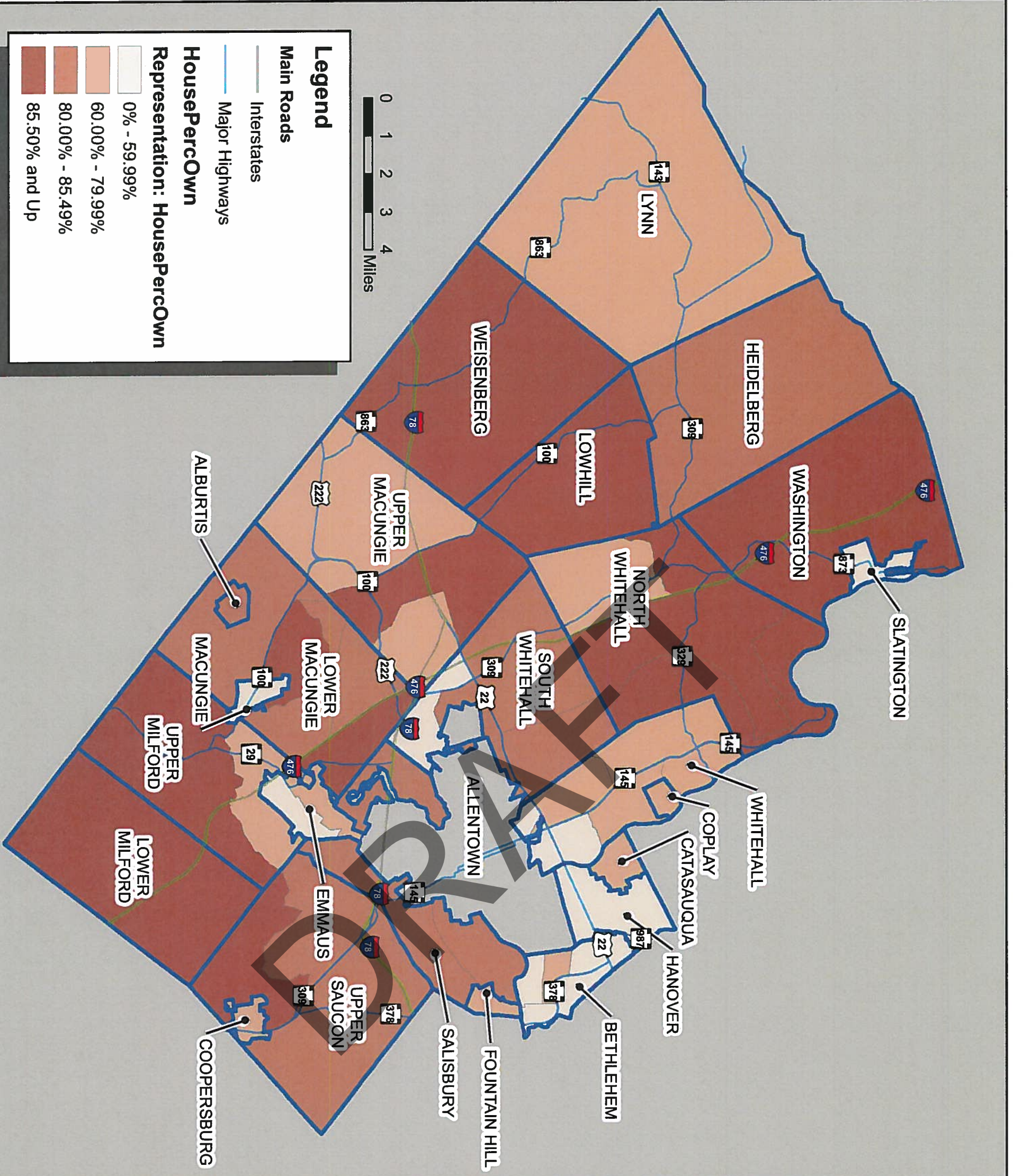
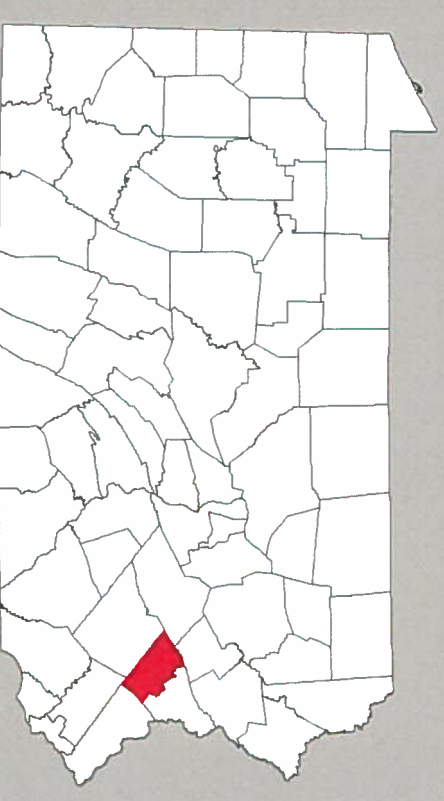
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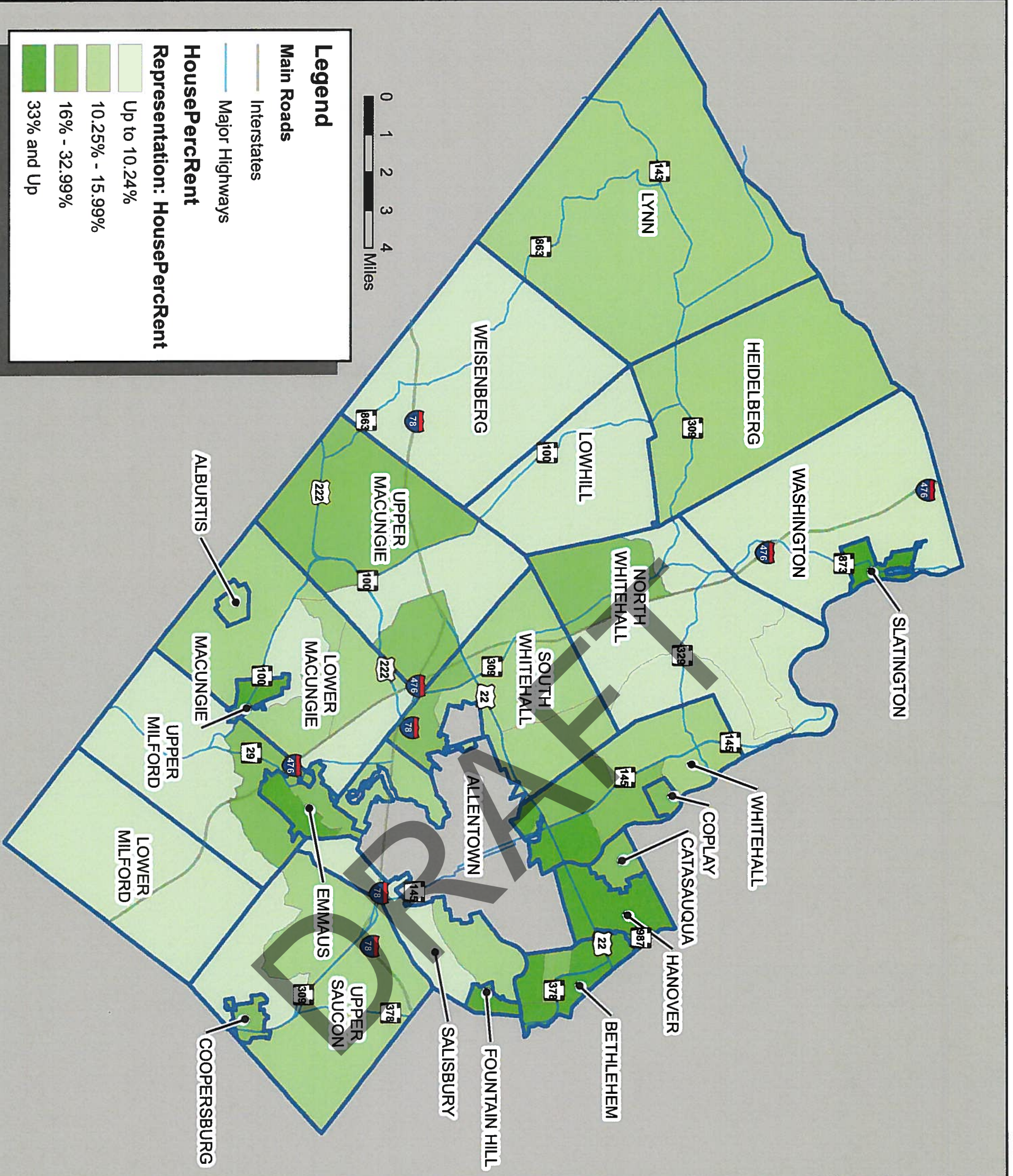
Age: % Over 65 Years by Census Tract 2010



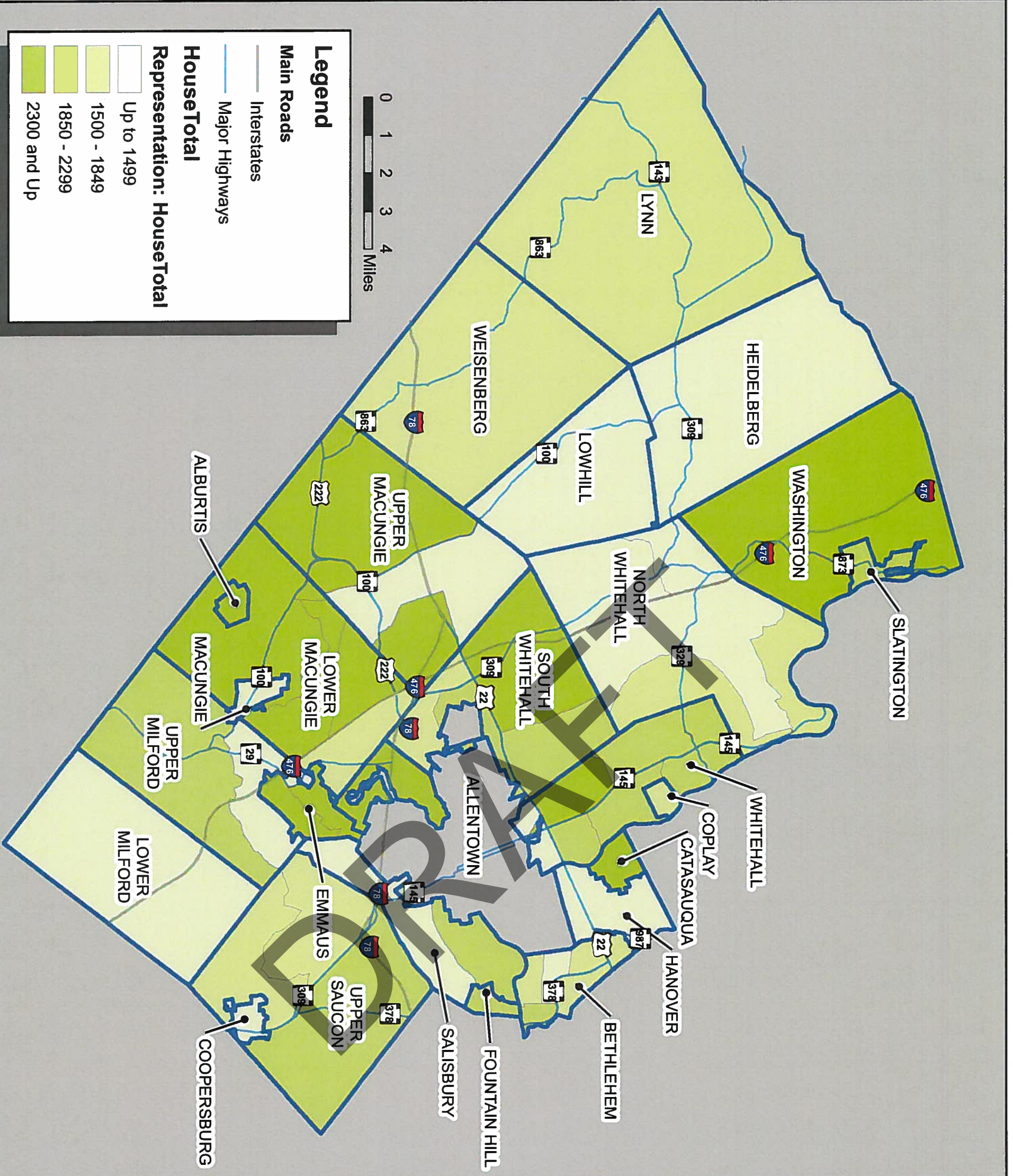
Housing: % Owner Occupied by Census Tract 2010



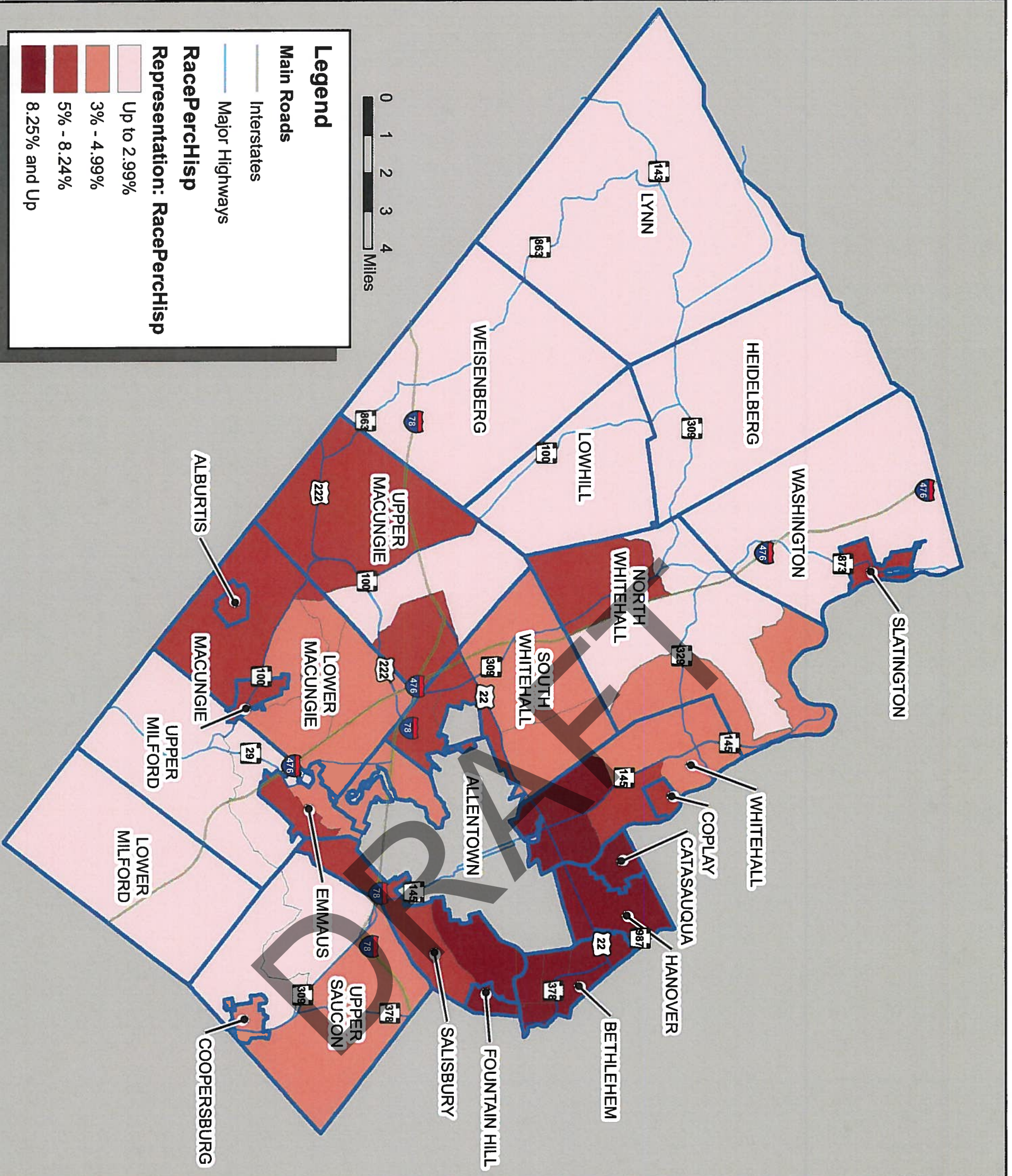
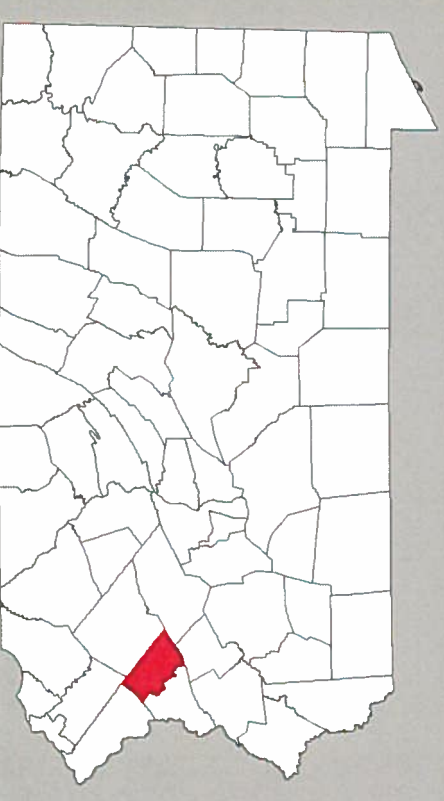
Housing: % Renter Occupied by Census Tract 2010



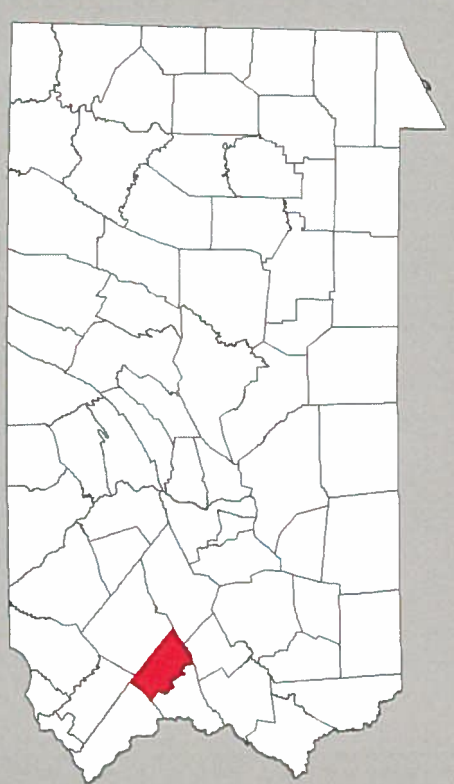
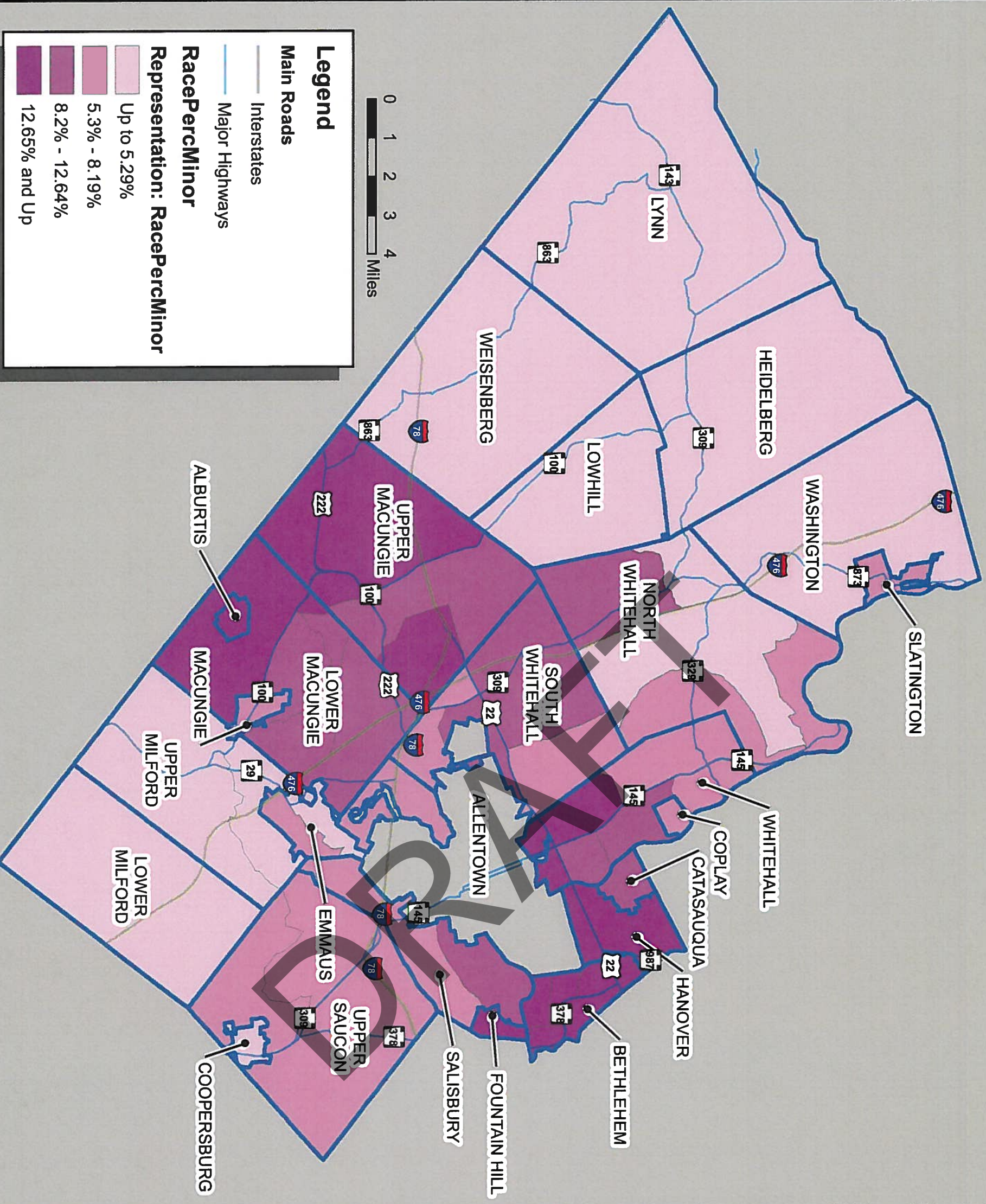
Housing: Total Units by Census Tract 2010



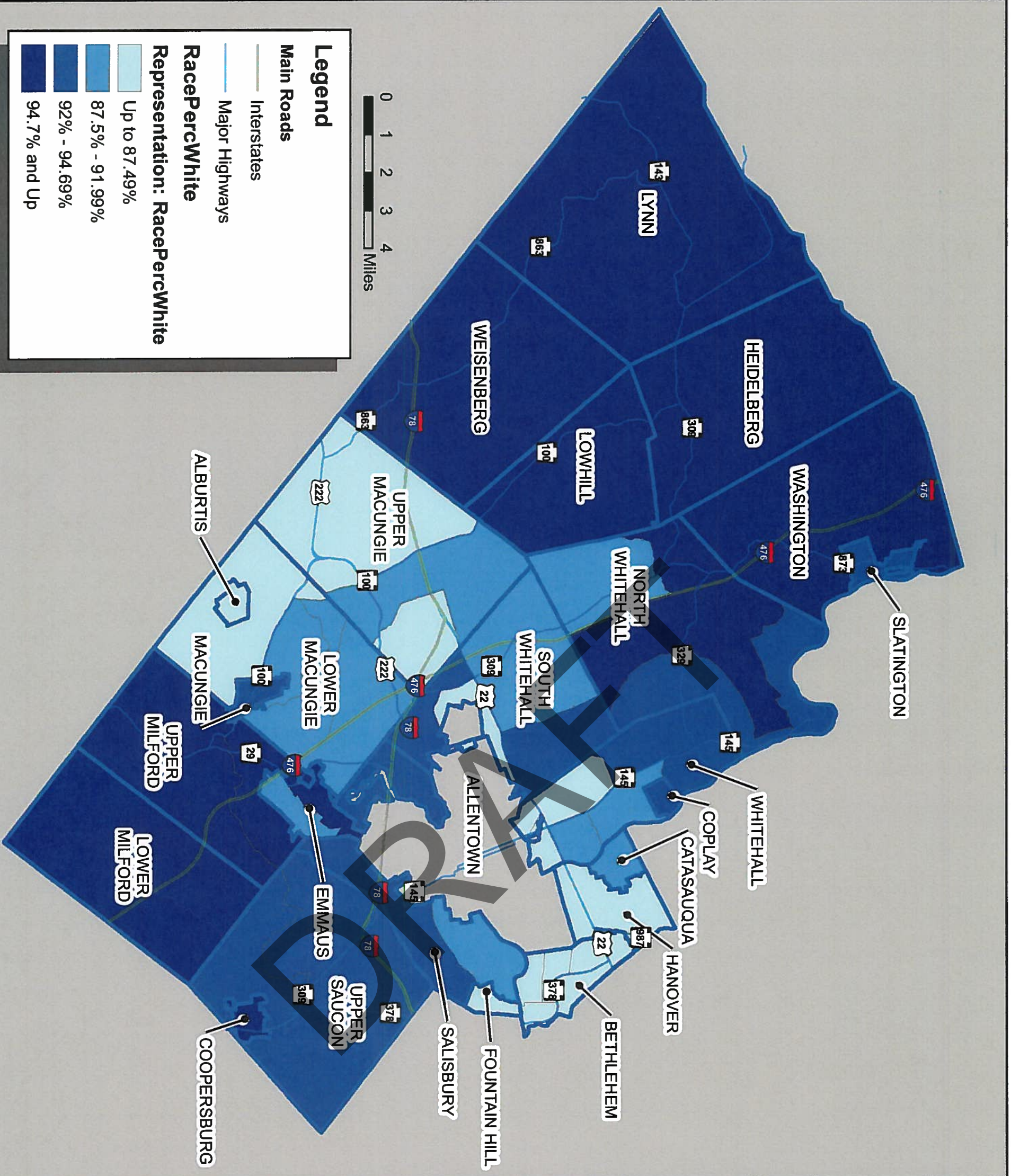
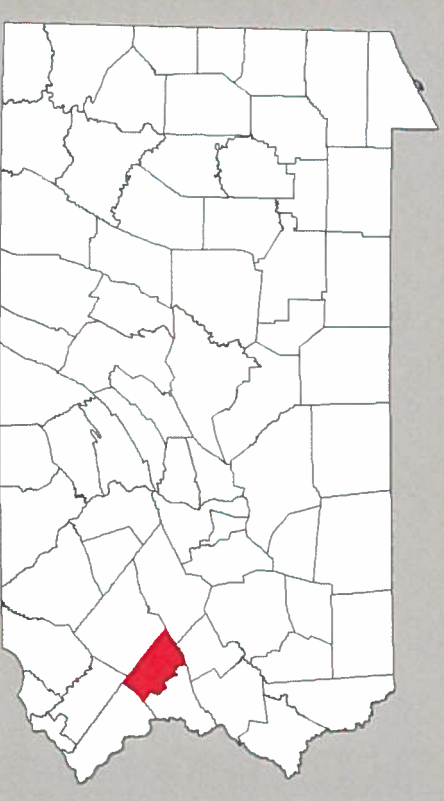
Race: % Hispanic by Census Tract 2010



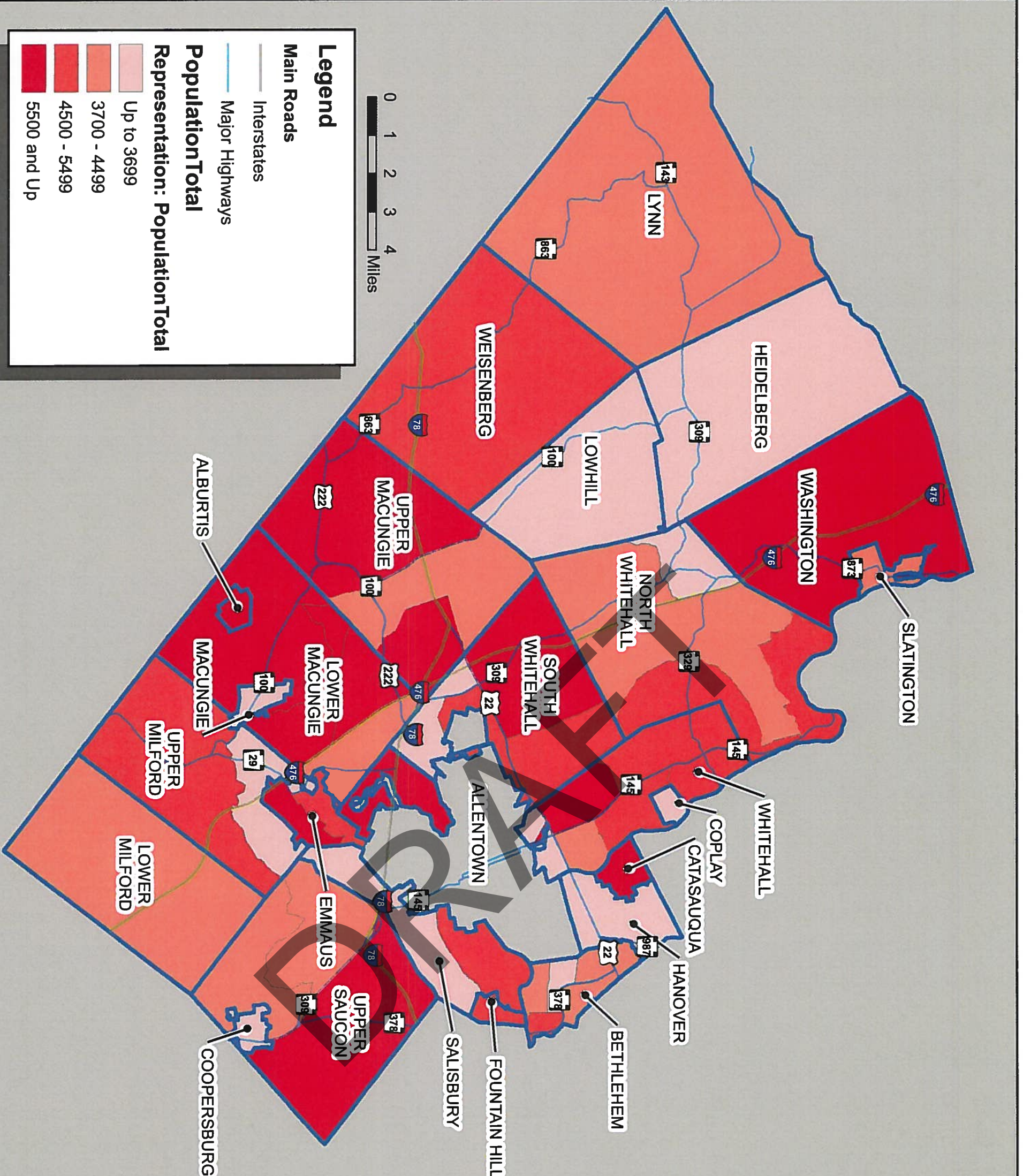
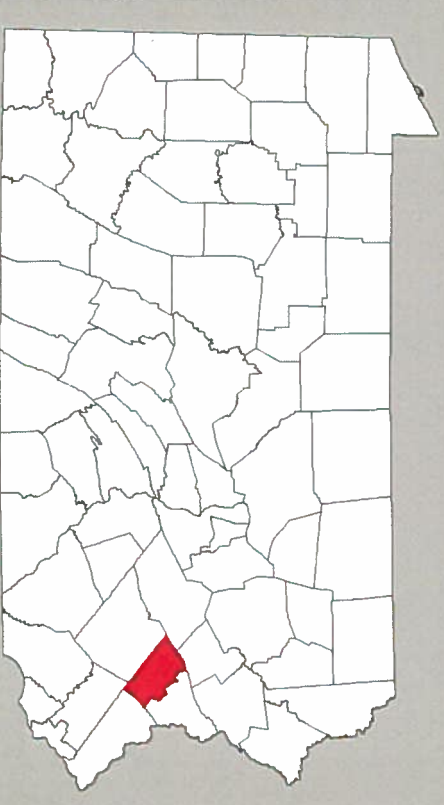
Race: % Minorities by Census Tract 2010



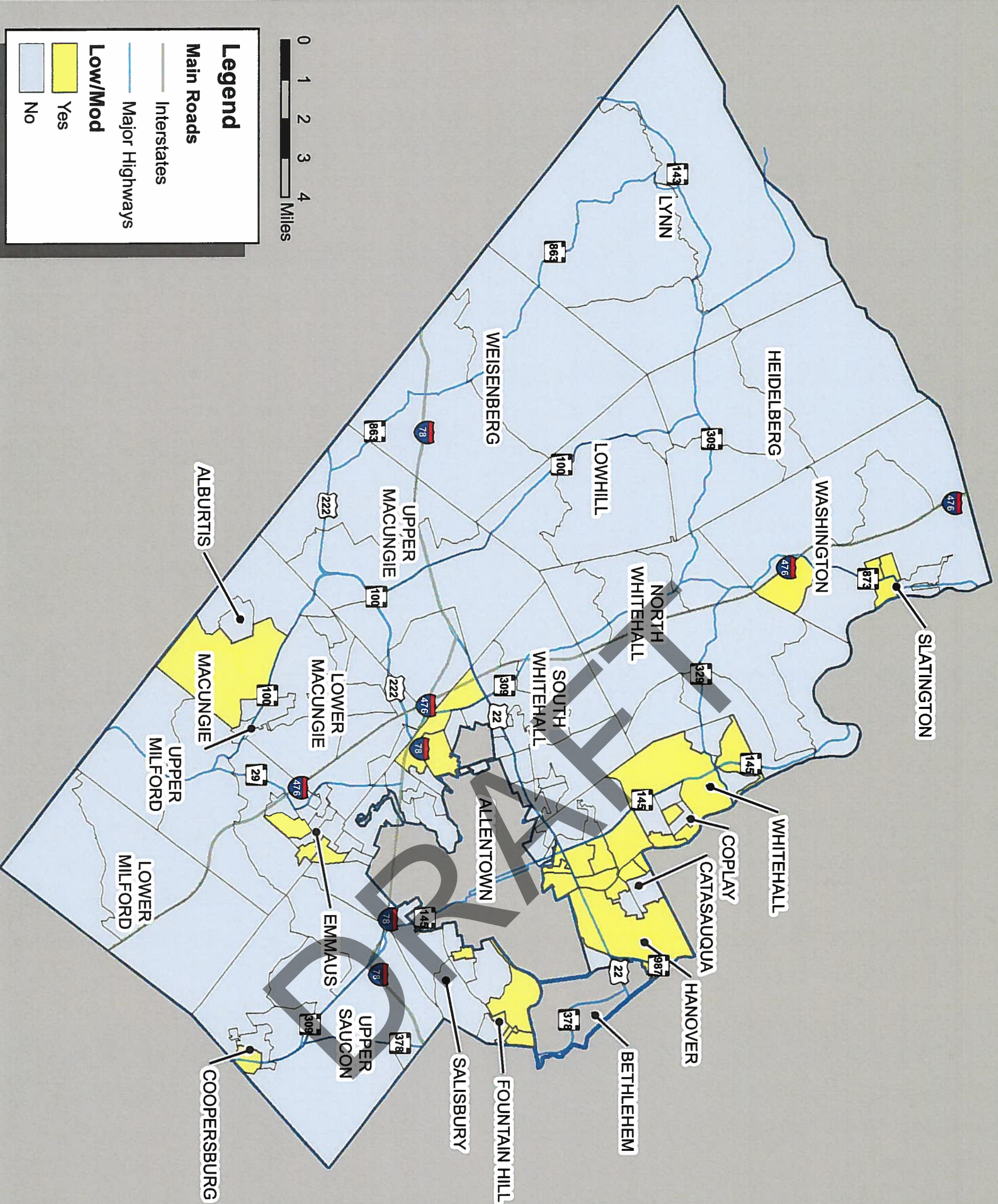
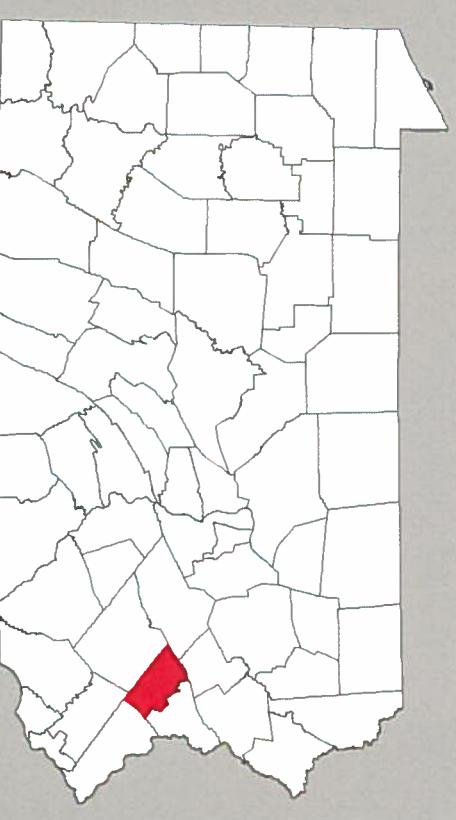
Race: % White by Census Tract 2010



Total Population by Census Tract 2010



Low to Moderat-Income by Block Groups



**CITIZENS
PARTICIPATION**

Proof of Publication Notice in The Morning Call

Under Act No. 587, Approved May 16, 1929, and its amendments

STATE OF PENNSYLVANIA }
COUNTY OF LEHIGH } SS:

COPY OF NOTICE OR ADVERTISEMENT

Sharon A. Repsher, Manager of Billing and Collections of THE

MORNING CALL, LLC, of the County and State aforesaid, being duly sworn, deposes and says that THE MORNING CALL is a newspaper of general circulation as defined by the aforesaid Act, whose place of business is 101 North Sixth Street, City of Allentown, County and State aforesaid, and that the said newspaper was established in 1888 since which date THE MORNING CALL has been regularly issued in said County, and that the printed notice or advertisement attached hereto is exactly the same as was printed and published in regular editions and issues of the said THE MORNING CALL on the following dates, viz.:

..... and the 24th day of February 2014

Affiant further deposes that he is the designated agent duly authorized by THE MORNING CALL, LLC, a corporation, publisher of said THE MORNING CALL, a newspaper of general circulation, to verify the foregoing statement under oath, and the affiant is not interested in the subject matter of the aforesaid notice or advertisement, and that all allegations in the foregoing statements as to time, place and character of publication are true.

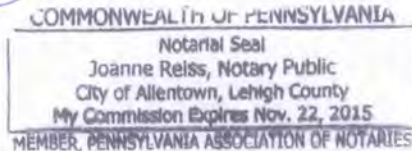
Sharon A. Repsher

Designated Agent, THE MORNING CALL, LLC

SWORN to and subscribed before me this 24th day of

February 2014

Notary Public



THE MORNING CALL, LLC, publisher of THE MORNING CALL, a newspaper of general circulation, aforesaid notice and publication costs and certifies that the same have been duly paid.

Record # 37711

LEHIGH COUNTY,
PENNSYLVANIA
COMMUNITY DEVELOPMENT
BLOCK GRANT (CDBG)

PUBLIC HEARING NOTICE AND
REQUESTS FOR PROPOSALS
FROM NON-PROFITS AND
MUNICIPAL AGENCIES

Notice is hereby given by Lehigh County, PA that it will hold public hearings, on Tuesday, March 11, 2014 at 2:00 pm and Thursday, March 27, 2014 at 6:00 pm, prevailing time, in the Public Hearing Room of the Lehigh County Government Center, 17 South 7th Street, Allentown, PA 18101. The Government Center is accessible to persons with physical disabilities. If special arrangements need to be made to accommodate citizens in order for them to participate in the public hearing, please call the Office of Community Development, at (610) 782-3565 (PA Relay Center TDD, 7-1-1) to make those arrangements.

The purpose of those public hearings is to discuss the County's Community Development Block Grant Program (CDBG), and the community development, housing, and economic development needs of Lehigh County. The County will afford non-profits and municipal jurisdictions and agencies the opportunity to request funds for projects and activities. This information will be utilized by the County in its preparation of the FY 2014 Annual Action Plan. Lehigh County anticipates that it will receive an estimated allocation of \$1,151,731 in CDBG Entitlement funds based on last year's Federal grant amounts and will be subject to the U.S. Department of Housing and Urban Development's allocation for the County's FY 2014 CDBG Program. In order to receive these funds, Lehigh County must prepare a One Year Annual Action Plan for the use of the CDBG funds. At least 70% of the CDBG funds must benefit low- and moderate-income persons. The County intends to afford citizens, local agencies, and interested parties with the opportunity to become involved in the planning process.

PUBLISHING COSTS

The following types of activities may be eligible for funding under the CDBG program: acquisition of property; disposition costs; improvements to public facilities, including the removal of architectural barriers; demolition and environmental clean-up; public service activities; interim assistance; relocation payments for persons displaced as a result of a CDBG activity; code enforcement; special economic development activities; special activities undertaken by a community based development organization; home ownership assistance for purchase of a house; planning; environmental; program administration; audit; and other miscellaneous activities.

If the County would undertake an activity that would result in the displacement of families or individuals, then the County would utilize its policy for minimizing such displacement. Furthermore, the County is responsible for replacing all low- and moderate-income housing units that may be displaced.

been regularly issued in said County, and that the printed advertisement attached hereto is exactly the same as was printed and published in regular editions and issues of the said THE MORNING CALL on the following dates, viz.:

..... and the 24th day of February 2014

Affiant further deposes that he is the designated agent duly authorized by THE MORNING CALL, LLC, a corporation, publisher of said THE MORNING CALL, a newspaper of general circulation, to verify the foregoing statement under oath, and the affiant is not interested in the subject matter of the aforesaid notice or advertisement, and that all allegations in the foregoing statements as to time, place and character of publication are true.

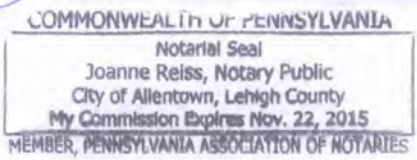
Sharon A. Repsher

Designated Agent, THE MORNING CALL, LLC

SWORN to and subscribed before me this 24th day of

February 2014

[Signature]
Notary Public



THE MORNING CALL, LLC, publisher of THE MORNING CALL, a newspaper of general circulation, hereby certifies that the aforesaid notice and publication costs and certifies that the same have been duly paid.

Record # 37711

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PUBLISH

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By

March 11, 2014 at 2:00 pm and Thursday, March 27, 2014 at 6:00 pm, prevailing time, in the Public Hearing Room of the Lehigh County Government Center, 17 South 7th Street, Allentown, PA 18101. The Government Center is accessible to persons with physical disabilities. If special arrangements need to be made to accommodate citizens in order for them to participate in the public hearing, please call the Office of Community Development, at (610) 782-3565 (PA Relay Center TDD, 7-1-1) to make those arrangements.

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The following types of activities may be eligible for funding under the CDBG program: acquisition of property; disposition costs; improvements to public facilities, including the removal of architectural barriers; demolition and environmental clean-up; public service activities; interim assistance; relocation payments for persons displaced as a result of a CDBG activity; code enforcement; special economic development activities; special activities undertaken by a community based development organization; home ownership assistance for purchase of a house; planning; environmental; program administration; audit; and other miscellaneous activities.

If the County would undertake an activity that would result in the displacement of families or individuals, then the County would utilize its policy for minimizing such displacement. Furthermore, the County is responsible for replacing all low- and moderate-income housing units that may be demolished or converted as a result of CDBG funds.

Persons, organizations, or municipalities that wish to request funding should obtain a copy of the request for funding applications which are due by April 15, 2014, to the County of Lehigh Office of Community Development, Government Center, Room 519, Allentown, PA.

All interested persons are encouraged to attend this public hearing and to present oral or written testimony concerning the needs of Lehigh County and the use of CDBG funds over the next fiscal year. Written comments may be addressed to Lehigh County, Government Center, Office of Community Development, 17 South 7th Street, Allentown, PA 18101 or by telephone (610) 782-3565.

PUBLISHING COSTS

..... of the

Attendance Sheet

PUBLIC HEARING #1

3/11/14, 2:00 pm, Public Hearing Room

<u>Name</u>	<u>Title</u>	<u>Organization</u>	<u>Phone</u>	<u>Email</u>
Laurie Moyer, Grants & Housing Manager		County of Lehigh	610.871.1964,	lauriemoyer@lehighcounty.org
Paulette Gilfoil, CDBG Program Coordinator		County of Lehigh	610.782.3566,	paulettgilfoil@lehighcounty.org
HOWARD LIPBERMAN	EXECUTIVE DIRECTOR	WHITALL IPA	484-358-3100	howard@bcfsol.com
Kristen Lenhart	Housing veterans services manager	LVCI L	(610) 770-9781 x129	kristenl@lvci.org
Kathleen	Grant writer	Valley Youth Hous.	610-820- 7222 2166	kkrahl@valleyyouthhousing.org
MARY ANN PROZKEKURAT	Exp. Dir	The Literacy Center	610-435-0680	mprozkekurat@theliteracycenter-nj.org
Robin Flores	Grant writer	"	"	"
Natasha Smith	student intern	The Literacy Center	Ext 112	nflores@theliteracycenter-nj.org
Frank Kene	Director of DEED	Lehigh County	610-790-7544	stnns09@mordecianj.edu frankk@lehighcounty.org

Public Hearing Minutes

3/11/14 – 2:00 to 3:00 p.m.

The meeting followed the agenda (attached), excluding items related to construction projects. Participants in the public hearing represented agencies interested in applying for public service and planning projects.

Specific projects were not discussed, instead brainstorming about potential projects occurred. Kristen Lenhart from LVCIL and Kathi Krablin from Valley Youth House asked questions regarding subsistence payments and security deposits. Laurie Moyer mentioned that Catholic Charities has run a successful subsistence program since 2007; such programs were looked upon favorably during past application reviews. Laurie also mentioned that applications requesting security deposits are not encouraged due to compliance with program income requirements.

Other topics discussed included the qualifications for public service applications – new service versus quantifiable increase. “New” service can include an entirely new program offered by a non-profit or a new branch of services offered elsewhere (e.g. previously one location but a new location is now being offered in a different municipality). Quantifiable increase at a current location can be proven by showing that there has been an increase in demand for services of at least 10% within the past 12 months (e.g. length of waiting list as compared to 12 months ago or 10% increase in phone calls, etc.).

Paulette Gilfoil discussed the Fair Housing certification. She also encouraged applicants to attend the upcoming Fair Housing Summit to learn more about Fair Housing issues in the Lehigh Valley.

Applicants were also reminded that strong applications will provide a follow up plan to pursue the documentation of post discharge / short term results of the services. Such plans would provide a comparison of the beneficiary’s situation at intake versus discharge and, at a minimum, again at 3 months and 6 months post discharge.

Applicants were encouraged to contact Paulette Gilfoil and Laurie Moyer before submitting the application to ask questions.

Attendance Sheet

PUBLIC HEARING #1, Session 2
3/27/14, 6:00 pm, Public Hearing Room

<u>Name</u>	<u>Title</u>	<u>Organization</u>	<u>Phone</u>	<u>Email</u>
Laurie Moyer, Grants & Housing Manager		County of Lehigh	610.871.1964,	lauriemoyer@lehighcounty.org
Paulette Gilfoil, CDBG Program Coordinator		County of Lehigh	610.782.3566,	paulettegilfoil@lehighcounty.org
Rose Ann Kisilewicz	Quality Assurance Coordinator	N.V. WORKFORCE Investment Board, Inc	610-841-1041	RKisilewicz@LWVBA.org

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Public Hearing Minutes

3/27/14 – 6:00 to 7:00 p.m.

The meeting followed the agenda (attached), excluding items related to construction projects. Participants in the public hearing represented Lehigh County and one agency – Lehigh Valley Workforce Investment Board - interested in applying for a public service project.

WIB representative discussed the project idea, and whether it would be an economic development project or a public service project. WIB would like to offer job training to a specific population or higher income population (currently only able to serve those with income less than 70% of the poverty level). WIB is primarily interested in funding to build up training accounts for LMI households. Discussion was lengthy on income documentation, match and qualifications for public service projects.

Applicant was also reminded that strong applications will provide a follow up plan to pursue the documentation of post discharge / short term results of the services. Such plans would provide a comparison of the beneficiary's situation at intake versus discharge and, at a minimum, again at 3 months and 6 months post discharge. WIB purportedly already performs follow up interviews, even at the 12 month post activity point.

Applicant was encouraged to contact Paulette Gilfoil and Laurie Moyer before submitting the application to ask questions.

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NOTICE OF PUBLIC HEARING

LEHIGH COUNTY'S FY 2014 ANNUAL ACTION PLAN

Notice is hereby given that Lehigh County, Pennsylvania will hold a public hearing on Friday, August 1, 2014 at 3:00 PM, prevailing time, in Room 524 of the Government Center, 17 South Seventh Street, Allentown, PA on the proposed Annual Action Plan for FY 2014. The Government Center and Room 524 are accessible to persons with physical disabilities. If special arrangements need to be made to accommodate citizens in order for them to participate in the public hearing, please call Ms. Laurie A. Moyer, Grants & Housing Manager, at (610) 871-1964 to make those arrangements.

The purpose of this public hearing is to present the FY 2014 Lehigh County Annual Action Plan which shows the proposed use of the CDBG funds. Lehigh County has been notified by the U.S. Department of Housing and Urban Development (HUD) that it is eligible to receive a Federal Community Development Block Grant in the amount of \$1,152,713. The FY 2014 Annual Action Plan is to be submitted to the U.S. Department of Housing and Urban Development (HUD) on or before August 15, 2014.

In order to obtain the views of citizens, public agencies and other interested parties, Lehigh County has placed the FY 2014 Annual Action Plan on display beginning July 14, 2014 at the following locations in Lehigh County, as well as the Lehigh County website <http://www.LehighCounty.org>:

- **Lehigh County Department of Community and Economic Development** - Lehigh County Government Center, 17 South 7th Street, Allentown, PA 18101
- **Catasauqua Public Library** - 302 Bridge Street, Catasauqua, PA 18032
- **Coplay Library** - 49 South 5th Street, Coplay, PA 18037
- **Emmaus Public Library** - 11 East Main Street, Emmaus, PA 18049
- **Lower Macungie Library** - 3400 Brookside Road, Macungie, PA 18062
- **Parkland Community Library** - 4422 Walbert Avenue, Allentown, PA 18104
- **Slatington Library** - 650 Main Street, Slatington, PA 18080
- **Southern Lehigh Public Library** - 3200 Preston Lane, Center Valley, PA 18034
- **Whitehall Township Public Library** - 3700 Mechanicsville Road, Whitehall, PA 18052

These documents will be available to the public during normal hours of operation for a period of thirty (30) days until August 13, 2014 after which time the FY 2014 Annual Action Plan will be submitted to HUD on or before August 15, 2014 for approval.

The proposed FY 2014 Annual Action Plan was prepared in accordance with the County's Five Year Consolidated Plan for FY 2012-2016 and after conducting public hearings on housing and community development needs in Lehigh County.

The County's FY 2014 CDBG Program Year begins October 1, 2014 and ends September 30, 2015.

The County proposes to use the FY 2014 HUD funds it receives as described below, subject to public comments received and the approval by the Board of Commissioners of the County of Lehigh:

Summary of FY 2014 Annual Action Plan

FY 2014 CDBG Allocation:		<u>\$ 1,152,713.00</u>
	Total:	\$ 1,152,713.00
Administration and Planning:		\$ 230,542.00
Public Services:		\$ 121,750.00
Public Facilities Improvements:		\$ 650,421.00
Housing:		<u>\$ 150,000.00</u>
	Total:	\$ 1,152,713.00

All interested citizens are encouraged to attend this public hearing and they will be given the opportunity to present oral or written testimony concerning the proposed use of CDBG funds under the FY 2014 Annual Action Plan. Written comments may be addressed to Ms. Laurie A. Moyer, Grants & Housing Manager, Government Center, 17 South Seventh Street, Allentown, PA 18101, or by email at lauriemoyer@lehighcounty.org or oral comments may be made by calling (610) 871-1964.

Laurie A Moyer
Grants & Housing Manager
Lehigh County

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Lehigh Valley Association of REALTORS® presents...



Lehigh Valley Fair Housing Summit

Practical Training for REALTORS®, Housing Professionals and Community Leaders

April 24, 2014

8:30 AM to 12:30 PM

Doors Open 8 AM for Breakfast & Networking | Holiday Inn Allentown Center City

\$25 per person | register online at lvar.org/FairHousingSummit

This half-day event will bring together Fair Housing experts to discuss real world scenarios about fair housing challenges in the Lehigh Valley and how REALTORS®, housing professionals, and community leaders can become more knowledgeable about compliance with fair housing laws.

Eligible for 3.5 Hours CE Credits for Realtors®

Hear from industry leaders on topics including:

- Address by Jane Vincent, HUD Regional Administrator for Region III
- State of Fair Housing in the Lehigh Valley and Beyond
- Fair Housing Expert Panel
- Fair Housing Enforcement and Testing
- Disability Discrimination in Property Management and Rentals
- Zoning: Obstacles to Fair Housing Compliance

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