
LEHIGH COUNTY, PENNSYLVANIA

DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT

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

FY 2019-2023 Five Year Consolidated Plan & FY 2019 Annual Action Plan - Substantial Amendment # 3

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

**Amended:
August 2, 2022**

Frank Kane, Director
Department of Community and
Economic Development



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DRAFT #3

**CARES Act Substantial Amendment # 3:**

The third amendment was submitted to HUD on August 2, 2022 to amend the following CDBG-CV projects: Technology Adaptations Program - decrease the original budget amount of \$315,085 by \$252,699.30 for a new budget amount of \$62,385.70; Food Security Program - increase the original budget amount of \$250,000 by \$450,000 for a new budget amount of \$700,000; Financial and Legal Counseling Program - decrease the original budget amount of \$250,000 by \$250,000 for a new budget amount of \$0; Housing Stabilization Program - decrease original budget amount of \$750,000 by \$77,300.70 for a new budget amount of \$672,699.30; COVID Support Program - create a new program start-up with a budget of \$120,000; and Lehigh Career & Technical Institute - increase the original budget amount of \$30,000 by \$30,000 for a new budget amount of \$60,000.

CARES Act Substantial Amendment # 2:

Second amendment on July 30, 2021 to add CDBG-CV3 allocation to the FY 2019 Annual Action Plan.

CARES Act Substantial Amendment # 1:

Amended on September 21, 2020 to add CDBG CARES Act funds to the FY 2019 Annual Action Plan.

Executive Summary

ES-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduction

Lehigh County, Pennsylvania is an entitlement community under the U.S. Department of Housing & Urban Development's (HUD) Community Development Block Grant (CDBG) Program. In compliance with the HUD regulations, Lehigh County has prepared this FY 2019-2023 Five

Year Consolidated Plan for the period of October 1, 2019 through September 30, 2020. This consolidated plan is a strategic plan for the implementation of the County's Federal Programs for housing, community, and economic development within Lehigh County.

The Five Year Consolidated Plan establishes the County's goals for the next five (5) year period and outlines the specific initiatives the County will undertake to address its needs and objectives by promoting: the rehabilitation and construction of decent, safe, and sanitary housing; creating a suitable living environment; removing slums and blighting conditions; promoting fair housing; improving public services; expanding economic opportunities; and principally benefitting low- and moderate-income persons.

This Five Year Consolidated Plan is a collaborative effort of Lehigh County, the community at large, social service agencies, housing providers, advocates, planning agencies, community development and economic development groups. The planning process was accomplished through a series of public meetings, stakeholder interviews, resident surveys, statistical data, and review of the County's Comprehensive Plan and other community plans.

Maps:

Included in this Plan in the appendix section are the following maps which illustrate the demographic characteristics of the Lehigh County:

- Percent White Population by Block Group
- Percent Minority Population by Block Group
- Percent Population Age 65+ by Block Group
- Residents Age 65+ by Block Group
- Housing Units by Block Group
- Population Density by Block Group
- Percent Owner-Occupied Housing Units by Block Group
- Percent Renter-Occupied Housing Units by Block Group
- Percent Vacant Housing Units by Block Group
- Low/Moderate Income Percentage by Block Group
- Low/Moderate Income Percentage by Block Group with Minority Population Overlay
- Low/Moderate Income Block Groups and CDBG Project Locations

2. **Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview**

The "Vision" of this Five Year Consolidated Plan is to serve as a consolidated planning document, an application, and a strategic plan for Lehigh County. As part of the Five Year Consolidated Plan, the community must develop goals and objectives. The following strategies with subsequent goals and priorities have been identified for Lehigh County for the period of FY 2019 through FY 2023 for the Community Development Block Grant (CDBG) Program:

HOUSING STRATEGY - HSS

Goal:

Improve, preserve, and expand the supply of affordable housing for low- and moderate-income persons and families in Lehigh County.

Objectives:

- **HSS-1 Home Ownership** - Promote and assist in developing homeownership opportunities for low- and moderate-income persons & families.
- **HSS-2 Mixed Income Housing** - Promote and assist in the development of mixed income housing, both rental housing and housing for homebuyers.
- **HSS-3 Housing Rehabilitation** - Promote and assist in the preservation of existing owner and renter occupied housing stock in the County.
- **HSS-4 Housing Construction** - Promote and assist in the development of affordable housing, both rental and sales housing.
- **HSS-5 Revitalization** - Promote and assist in the stabilization of residential neighborhoods by removing slums and blight, assembling sites for new housing, rehabilitation of existing housing, and code enforcement.
- **HSS-6 Fair Housing** - Affirmatively further fair housing by promoting fair housing choice throughout Lehigh County.
- **HSS-7 Housing Support** - Promote and assist in housing counseling and support services to low- and moderate-income persons and families.

HOMELESS STRATEGY - HOM

Goal:

Improve the living conditions and services for homeless persons and families in Lehigh County.

Objectives:

- **HOM-1 Housing** - Promote and assist in developing housing opportunities for homeless persons, families, and those who are at-risk of becoming homeless.
- **HOM-2 Operations/Support** - Promote and assist in program support services for the homeless.
- **HOM-3 Homeless Prevention** - Promote and assist in anti-eviction and prevention of unfair housing practices, which may contribute to homelessness.

SPECIAL NEEDS STRATEGY - SNS

Goal:

Improve, preserve, and expand facilities for persons with special needs and the disabled in Lehigh County.

Objectives:

- **SNS-1 Housing** - Promote and assist to increase the supply of affordable, decent, safe, sound, and accessible housing for the elderly, persons with disabilities, and persons with other special needs through rehabilitation of existing housing and new construction of accessible housing.
- **SNS-2 Social Services** - Promote and assist to support social service programs and facilities for the elderly, persons with disabilities, and persons with other special needs.
- **SNS-3 Accessibility** - Promote and assist in making accessibility improvements to owner-occupied housing through rehabilitation and improve renter-occupied housing by making reasonable accommodations for the physically disabled.

COMMUNITY DEVELOPMENT STRATEGY - CDS

Goal:

Improve, preserve, and create new public and community facilities, infrastructure, and public services to ensure the quality of life for all residents of Lehigh County.

Objectives:

- **CDS-1 Community Facilities** - Assist in improving parks, recreational centers, trails, libraries, and other public and community facilities throughout the County.
- **CDS-2 Infrastructure** - Assist in improving the public infrastructure through rehabilitation, reconstruction, and new construction.
- **CDS-3 Public Services** - Assist in improving and increasing public safety, municipal services, and public service and human service programs throughout Lehigh County.

- **CDS-4 Accessibility** - Assist in improving the physical and visual accessibility of community facilities, infrastructure, and public buildings throughout the County.
- **CDS-5 Public Safety** - Assist in improving the public safety facilities, equipment, and ability for first responders for emergency situations throughout the County.
- **CDS-6 Clearance** - Assist in removing and eliminating slums and blighting conditions through demolition of vacant, abandoned, unsafe and dilapidated structures throughout the County.
- **CDS-7 Public Transit** - Promote development of additional bus routes and improved public transportation for low- and moderate-income persons.

ECONOMIC DEVELOPMENT STRATEGY - EDS

Goal:

Increase and promote job creation, job retention, self-sufficiency, education, job training, technical assistance, and economic empowerment of low- and moderate-income residents of Lehigh County.

Objectives:

- **EDS-1 Employment** - Support and encourage new job creation, job retention, employment, and job training services.
- **EDS-2 Financial Assistance** - Support business and commercial growth through expansion and new development with technical and financial assistance programs.
- **EDS-3 Revitalization** - Support and promote plans for new development and redevelopment to revitalize distressed areas of Lehigh County.
- **EDS-4 Financial Incentives** - Support and encourage new economic development through local, state and Federal tax incentives and programs.

ADMINISTRATION, PLANNING, AND MANAGEMENT STRATEGY - APM

Goal:

Provide sound and professional planning, administration, oversight and management of Federal, state, and local funded programs.

Objectives:

- **APM-1 Coordination** - Continue to provide sound and professional planning, program management and oversight for the successful administration of Federal, state, and local funded programs.

- **APM-2 Planning** - Continue to develop and plan for special studies, environmental clearance, fair housing, and compliance with all Federal, state, and local laws and regulations.

3. Evaluation of past performance

Lehigh County has a good performance record with HUD. The County regularly meets the performance standards established by HUD. Each year the County prepares its Consolidated Annual Performance and Evaluation Report (CAPER). This report is submitted within ninety (90) days after the start of the new program year. Copies of the CAPER are available for review at Lehigh County's Department of Community and Economic Development.

The FY 2017 CAPER, which was the second to last CAPER for the County's previous Five-Year Consolidated Plan, was approved by HUD in a letter dated April 8, 2019. In the FY 2017 CAPER, the Lehigh County expended 97.95% of its CDBG funds to benefit low- and moderate-income persons. The County expended 12% of its funds during the FY 2017 CAPER period on public services, which is below the statutory maximum of 15%. The County is in compliance with the HUD 1.5 maximum drawdown ratio. The County's ratio was 1.05 as of August 2, 2018.

4. Summary of citizen participation process and consultation process

Lehigh County has followed its Citizen Participation Plan in the planning and preparation of the Five Year Consolidated Plan. The County held two public hearings on the needs of the community and its residents on Tuesday, February 5, 2019 at 11:00 AM and 5:30 PM. This provided the residents, agencies and organizations with the opportunity to discuss the County's CDBG program and to provide suggestions for future CDBG Program priorities and activities.

The County emailed all the agencies and organizations that were contacted as part of the planning process to inform them that the plans were on public display and gave them information about the second public hearing.

A copy of the "Draft Five Year Consolidated Plan and the FY 2019 Annual Action Plan" was placed on public display for review by the general public, agencies and organizations in the community. A newspaper notice announcing that these documents were placed on public display was published in a newspaper of general circulation in the area. The "Draft Five Year Consolidated Plan and the FY 2019 Annual Action Plan" were on public display at the following locations:

- 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 Lehigh County website: <http://www.lehighcounty.org/Departments/Community-Economic-Development>

A citizen survey was prepared and sent out to residents. Also, a link was placed on the County's website. The results of the survey were used to help determine the goals and outcomes. A more detailed analysis and description of the citizen participation process is contained in Section PR-15 Citizen Participation.

CARES Act Substantial Amendment # 3:

Lehigh County ran a newspaper notice on Wednesday, July 27, 2022 of the FY 2019 Annual Action Plan - Substantial Amendment # 3. The County accepted public comments until Monday, August 1, 2022. The County held a Public Hearing on the Substantial Amendment on Friday, July 29, 2022 at 11:30 AM. The public hearing was held in Room 519 of the Lehigh County Government Center, 17 South 7th Street, Allentown, PA 18101. The purpose of the Public Hearing was to present the Substantial Amendment to the residents for the CDBG-CV funds.

5. Summary of public comments

Lehigh County held one Needs Public Hearing on Tuesday, February 5, 2019 at 11:00 AM and another Needs Public Hearing on the same day at 5:30 PM. Comments received at those public hearings are included in the attachments at the end of the Five Year Plan.

The FY 2019-2023 Five Year Consolidated Plan and FY 2019 Annual Action Plan were placed on public display and a Second Public Hearing is scheduled for Wednesday, July 17, 2019. Comments that were received at the Second Public Hearing are included in the attachments at the end of the Five Year Plan.

CARES Act Substantial Amendment # 3:

Comments received at the Public Hearing and during the display period are included in the Citizen Participation section at the end of this plan.

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

All comments and suggestions, that were received to date, have been accepted and incorporated into the planning document.

CARES Act Substantial Amendment # 3:

Lehigh County accepted all comments.

7. Summary

During the FY 2019 Program Year, Lehigh County will receive the following Federal funds:

- CDBG: \$1,216,119.00

Lehigh County proposes to undertake the following activities with the FY 2019 CDBG funds:

- Catholic Charities – Self-Sufficiency & Intervention Program - \$29,700.00
- Communities in Schools of the Lehigh Valley – Career Supports at LCTI - \$25,000.00
- County of Lehigh – County-wide Housing Rehabilitation Program (CWHR) - \$200,000.00
- Emmaus Borough – Curb Cuts - \$34,700.00
- Fountain Hill Borough – Street Reconstruction - \$284,050.00
- Lehigh Carbon Community College Foundation – ESL for Communication Success - \$6,000.00
- Lehigh Career & Technical Institute – Scholarships for Low-Income Residents - \$19,500.00
- Lehigh Valley Center for Independent Living – People Living in Accessible Community Environments (PLACE) - \$15,062.00
- Macungie Borough – Curb Cuts - \$11,600.00
- Meals on Wheels – Meal Prep and Delivery - \$20,000.00
- North Penn Legal Services – LMI Legal Aid Help - \$10,000.00
- Salisbury Township – Sanitary Sewer Rehabilitation - \$90,799.00
- Slatington Borough – Memorial Park - \$98,085.00
- The Literacy Center – ESL & ABE Courses - \$15,000.00
- Whitehall Township – Curb Cuts - \$113,400.00
- Administration - \$243,223.00

CARES Act Substantial Amendment # 3:

Lehigh County is amending its FY 2019 Annual Action Plan to access the CARES Act funds. The County will receive two (2) allocations of the Community Development Block Grant - Coronavirus (CDBG-CV) funds. The first allocation received by the County was \$757,860 and in the third round of funding, the County received an allocation of \$1,267,910 for a total allocation of \$2,025,770 CDBG-CV funds. Lehigh County amended its FY 2019 Annual Action Plan for the CARES Act funds.

The Substantial Amendment # 3 consist of the following amendments:

- **Technology Adaptations Program** - decrease the original budget amount of \$315,085 by \$252,699.30 for a new budget amount of \$62,385.70.
- **Food Security Program** - increase the original budget amount of \$250,000 by \$450,000 for a new budget amount of \$700,000.
- **Financial and Legal Counseling Program** - decrease the original budget amount of \$250,000 by \$250,000 for a new budget amount of \$0. This project will then be canceled.

- ***Housing Stabilization Program*** - decrease original budget amount of \$750,000 by \$77,300.70 for a new budget amount of \$672,699.30.
- ***COVID Support Program*** - create a new program start-up with a budget of \$120,000.
- ***Lehigh Career & Technical Institute*** - increase the original budget amount of \$30,000 by \$30,000 for a new budget amount of \$60,000.

Lehigh County ran a newspaper notice on Wednesday, July 27, 2022 of the FY 2019 Annual Action Plan - Substantial Amendment # 3. The County accepted public comments until Monday, August 1, 2022. The County held a Public Hearing on the Substantial Amendment on Friday, July 29, 2022 at 11:30 AM. The public hearing was held in Room 519 of the Lehigh County Government Center, 17 South 7th Street, Allentown, PA 18101.

The FY 2019 Action Plan – Substantial Amendment # 3 was re-submitted in IDIS to HUD on or before August 5, 2022 once the public comments period ended.

DRAFT #3

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities 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	Department of Community and Economic Development
CDBG	Lehigh County	Department of Community and Economic Development

Table 1 – Responsible Agencies

Narrative

The administering lead agency is Lehigh County's Department of Community and Economic Development. The Community and Economic Development Department (DCED) has four (4) full-time staff members, and one (1) part-time staff, along with a planning consulting firm to assist with the oversight and compliance for 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 Performance and Evaluation Reports (CAPER), processes pay requests, and performs contracting and oversight of the programs on a day to day basis. In addition, the planning consulting firm is available to assist the County on an as needed basis.

Consolidated Plan Public Contact Information

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PR-10 Consultation - 91.100, 91.200(b), 91.215(l)**1. Introduction**

Lehigh County held a series of meetings and interviews with non-profits, the Lehigh County Housing Authority, local housing providers, social service agencies, community and economic development organizations, the local Continuum of Care members, County department representatives, and representatives of the municipalities within Lehigh County. An online survey was created for stakeholders and residents to complete, which identified needs, gaps in the system, and programmatic goals for the next five years. Input from the meetings and surveys were used in the development of specific strategies and priorities for the Five Year Plan.

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

Lehigh County works with the following agencies to enhance coordination:

- **The Lehigh County Housing Authority** – Improvements to public housing communities.
- **Social Services Agencies** – funds to improve services to low and moderate income persons.
- **Housing Providers** – funds to rehabilitate and develop affordable housing and provide housing options for low- and moderate-income households.
- **Community and Economic Development Agencies** – funds to improve services to low and moderate income persons.
- **Municipalities** – funds for infrastructure improvements, public facilities, and demolition.

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

The CoC addresses the needs of homeless persons and persons at risk of homelessness through the Connect To Home: Coordinated Entry System of Eastern PA (CES). CES is accessible through a call center operated by PA 2-1-1 and there are seventeen (17) CES access sites across the CoCs five (5) regions that provide in-person screenings and referrals. CES has access to translation services and assessment tools in English and Spanish. Community outreach to vulnerable populations is also conducted by CES. Persons referred to intake points are assessed with the VI-SPDAT assessment system. Based on a person's VI-SPDAT score, the person referred to CES will then be enrolled in either a Rapid Rehousing or Permanent Supportive Housing program. Risk factors for homelessness include institutional discharge without a home plan, foster care youth, the loss of employment, or families with young children.

The Point in Time Counts for the sheltered and unsheltered homeless population are completed on a designated date twice a year in the months of January and July. The collected data is forwarded to the firm of Diana T. Myers and Associates, Inc. The results of the counts are available in the state PAHMIS

system for approved users. The public can access the information through the HUD website and the Housing Alliance of Pennsylvania website.

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

ESG – ESG funds for member counties and cities in the Eastern PA CoC are administered through the Pennsylvania Department of Community and Economic Development (DCED) and through the City of Allentown. The CoC is consulted by DCED regarding past program performance and involvement of ESG applicants. The CoC provides input on the allocation of ESG funding to subrecipients, through a “Performance Interview Planning Checklist” that was developed as a standardized tool for CoC input on applicant capacity and participation in the CoC. A representative of the City of Allentown’s ESG program attends meetings of the Lehigh Valley Regional Homeless Advisory Board (RHAB) to coordinate the provision of services.

Develop Performance Standards and Evaluate Outcomes – 100% of CoC-funded projects operate using a Housing First approach, per CoC policy. The CoC provides multiple training opportunities to ensure that staff understand trauma-informed care, harm reduction, and the Housing First approach. The Eastern PA CoC has finalized a new monitoring plan that will implement goals through the CoCs Data Committee. Board members of the CoC will evaluate each applicant’s performance and participation in the CoC through a standardized checklist with scores and rankings. The Eastern PA CoC performs quarterly evaluations for ESG and CoC funded projects. Performance data generated through HMIS is also used in evaluations. Performance standards incorporate the Coordinated Entry process and the HMIS data of individuals to determine if CoC strategies are implemented effectively.

HMIS – Throughout different times of the year, the CoC and the HMIS lead work together to assess data quality throughout the CoC. This includes working on the Annual Homeless Assessment Report (AHAR) submission, the PIT count, project review/ranking, and working with the individual programs while completing their Annual Performance Reports (APRs). The Commonwealth of Pennsylvania’s Department of Community and Economic Development is the lead for HMIS data for the Eastern PA CoC. HMIS Data is combined with data from the Coordinated Entry queue to properly assess both projects and service provisions. ETO, the software system utilized by those that provide shelter to domestic service providers, is also utilized in conjunction with HMIS for the homeless population.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

1	Agency/Group/Organization	Lehigh County
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Child Welfare Agency Other government - County Civic Leaders Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lehigh County Department of Community & Economic Development submitted a funding request for the County-wide Housing Rehabilitation Program, and for Blighted Property Renovation. The County-wide Housing Rehabilitation Program and the Blighted Property Renovation projects were funded in FY 2019.
2	Agency/Group/Organization	Coplay Borough
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.

3	Agency/Group/Organization	Slatington Borough
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.

4	Agency/Group/Organization	Coopersburg Borough
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.

5	Agency/Group/Organization	Alburtis Borough
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.

6	Agency/Group/Organization	Salisbury Township
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.

7	Agency/Group/Organization	Macungie Borough
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
8	Agency/Group/Organization	Lehigh County Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
9	Agency/Group/Organization	Workforce Board Lehigh Valley
	Agency/Group/Organization Type	Services-Employment Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
10	Agency/Group/Organization	Lehigh Valley Economic Development Corporation
	Agency/Group/Organization Type	Regional organization Business Leaders Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
11	Agency/Group/Organization	Neighborhood Housing Services of the Lehigh Valley, Inc.
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
12	Agency/Group/Organization	LVHN Comprehensive Health Services
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Health Agency Business Leaders Major Employer
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
13	Agency/Group/Organization	Lehigh Valley Planning Commission
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Regional organization Planning organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
14	Agency/Group/Organization	Lehigh County Emergency Management Department

	Agency/Group/Organization Type	Other government - Local Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
	15 Agency/Group/Organization	VIA of the Lehigh Valley
15	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Services-Health Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.

16	Agency/Group/Organization	North Penn Legal Services
	Agency/Group/Organization Type	Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
17	Agency/Group/Organization	The Literacy Center
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.

18	Agency/Group/Organization	Meals on Wheels of the Greater Lehigh Valley
	Agency/Group/Organization Type	Services-Elderly Persons Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
19	Agency/Group/Organization	Center for Vision Loss
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
20	Agency/Group/Organization	Community Action Development Corporation of Allentown
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Service-Fair Housing Regional organization Planning organization Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
21	Agency/Group/Organization	Lehigh Conference of Churches
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services - Victims

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
22	Agency/Group/Organization	Valley Youth House
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-homeless Service-Fair Housing Child Welfare Agency Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.

23	Agency/Group/Organization	Community First Fund
	Agency/Group/Organization Type	Housing Services - Housing Services-Employment Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
24	Agency/Group/Organization	Catholic Charities Diocese of Allentown
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services - Victims Publicly Funded Institution/System of Care

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
25	Agency/Group/Organization	The Salvation Army
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Victims of Domestic Violence Services-homeless Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.

26	Agency/Group/Organization	Lehigh Valley Center for Independent Living
	Agency/Group/Organization Type	Housing Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
27	Agency/Group/Organization	Turning Point of the LV, Inc.
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services - Victims Child Welfare Agency Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
28	Agency/Group/Organization	The ARC: Lehigh & Northampton Counties
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Health Agency Child Welfare Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
29	Agency/Group/Organization	Casa Guadalupe Center
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Education Services-Employment Child Welfare Agency Civic Leaders

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
30	Agency/Group/Organization	BB&T
	Agency/Group/Organization Type	Business Leaders Private Sector Banking / Financing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
31	Agency/Group/Organization	Pennsylvania Eastern Continuum of Care Collaborative
	Agency/Group/Organization Type	Housing Services - Housing Publicly Funded Institution/System of Care Correctional Institutions

	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; homeless priorities; social service and economic development needs.
32	Agency/Group/Organization	USDA Rural Utilities
	Agency/Group/Organization Type	Broadband Service Provider
	What section of the Plan was addressed by Consultation?	Broadband Access Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Phone interview to discuss broadband access needs.

Table 2 – Agencies, groups, organizations who participated

The following agencies were consulted during the preparation of the Five Year Consolidated Plan:

- Lehigh County
- Coplay Borough
- Slatington Borough
- Coopersburg Borough
- Alburtis Borough
- Salisbury Township
- Macungie Borough
- Lehigh County Housing Authority
- Neighborhood Housing Services of the Lehigh Valley, Inc.
- Lehigh Valley Planning Commission
- VIA of the Lehigh Valley
- North Penn Legal Services
- The Literacy Center
- CACLV/Community Action Development Corporation of Allentown
- Lehigh Conference of Churches
- Valley Youth House
- Community First Fund
- Catholic Charities Diocese of Allentown
- The Salvation Army

- Lehigh Valley Center for Independent Living
- Turning Point of the LV, Inc.
- Casa Guadalupe Center
- BB&T

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

All 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?
CoC Consolidated Application	Lehigh Valley Regional Homeless Advisory Board	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
Annual and Five Year Capital Plans	Lehigh County Housing Authority	Lehigh County Housing Authority is the lead agency providing public housing assistance in Lehigh County. The goals of the County and the Housing Authority are complementary.
Lehigh County Emergency Management Plan	Lehigh County Emergency Management	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
2017 Childhood Lead Surveillance Annual Report	PA Department of Health	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
Pennsylvania Broadband Initiative	PA Department of Community and Economic Development	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
Livable Landscapes – Lehigh County Open Space Plan	Lehigh Valley Planning Commission	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
Analysis of Impediments to Fair Housing Choice	Lehigh County Department of Community and Economic Development	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

Lehigh County's Department of Community and Economic Development is the administrating agency for the CDBG program. Close coordination is maintained with other County departments such as the Public Works, Parks & Recreation, Administration, Emergency Management, Lehigh County Housing Authority, the Eastern PA Continuum of Care, and the Lehigh Valley Planning Commission, as well as local municipalities such as Coopersburg, Slatington, Macungie, Alburtis, and Coplay Boroughs and Salisbury Township. Coordination with various non-profit organizations, such as Lehigh Valley Conference of Churches, North Penn Legal Services, Valley Youth House, Catholic Charities, Turning Point of the LV, and Casa Guadalupe Center helped aid the planning process which developed priorities. The County works closely with the Lehigh County Commissioners and County staff to address projects and activities that extend between multiple municipalities within the County.

DCED has developed an evaluation checklist for ESG applicants to determine funding based on priorities. The CoC partners with the City of Allentown, the other ESG recipient in Lehigh County, to coordinate funding. The City of Allentown sends a representative to the meetings of the Lehigh Valley Regional Homeless Advisory Board (RHAB) where CoC funding is determined based on performance data and CoC priorities.

Narrative (optional):**AFH Specific:**

Lehigh County previously prepared an Analysis of Impediments to Fair Housing Choice in 2009. On July 16, 2015, the U.S. Department of Housing and Urban Development (HUD) published its final rule on Affirmatively Furthering Fair Housing. This rule attempted to establish a standardized process for fair housing planning and so the County began the process of preparing an Assessment of Fair Housing (AFH) in the summer of 2017. However, HUD announced on Friday, May 18, 2018 that it would be suspending the implementation of the AFFH Rule, withdrawing the AFH Tool, and requiring communities to revert back to the Analysis of Impediments to Fair Housing Choice (AI) due to deficiencies in the requirements, information available, and public participation.

Therefore, Lehigh County has prepared this 2018-2022 Analysis of Impediments to Fair Housing Choice (AI) in cooperation with the Lehigh County Housing Authority. The AI was approved by the County and submitted to HUD on February 28, 2019. The findings produced through this analysis will be further addressed in the County's FY 2019-2023 Five Year Consolidated Plan. To complete the AI, Lehigh County and the Lehigh County Housing Authority conducted research through regional studies and held in-person meetings and phone interviews. All agencies consulted for the Five Year Consolidated Plan were consulted for the AI, including additional organizations such as: the Allentown Housing Authority, Greater Lehigh Valley Realtors, Fulton Mortgage, Hispanic American Organization, Housing Association Development Center, Housing Equality Center, LANta, New Bethany Ministries, Northwestern School District, QNB Bank, and the Lehigh County Community College.

PR-15 Citizen Participation**1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting**

Lehigh County has followed its adopted Citizens Participation Plan to develop its Five Year Consolidated Plan.

The FY 2019-2023 Consolidated Plan and FY 2019 Annual Action Plan have many components that require and encourage citizen participation. These components consist of the following: interviews and roundtable discussions with various stakeholders; telephone interviews; a public needs hearing; and a public hearing to gather comments on the draft plan on public display. The County also developed a survey to obtain resident input. The Survey was made available in an online version on the County's website and in a hard copy version available in the Lehigh County Government Center, Lehigh County Housing Authority's communities, and other public facilities. The County received 102 completed surveys. All of these comments are included in the Consolidated and Annual Action Plan in the Exhibit Section. Through the citizen participation process, the County uses citizen input to develop how the plan would best serve the low- and moderate-income population and to reach the goals set forth in the Five Year Consolidated Plan.

CARES Act Substantial Amendment # 3:

Lehigh County ran a newspaper notice on Wednesday, July 27, 2022 of the FY 2019 Annual Action Plan - Substantial Amendment # 3. The County accepted public comments until Monday, August 1, 2022. The County held a Public Hearing on the Substantial Amendment on Friday, July 29, 2022 at 11:30 AM. The FY 2019 Annual Action Plan – Substantial Amendment # 3 was submitted to the U.S. Department of Housing and Urban Development Philadelphia Office on or before August 5, 2022.

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/ Organizations	See public hearing sign-in sheets in the Exhibit section of the Consolidated Plan.	See public hearing comments in the Exhibits section of the Consolidated Plan.	None.	Not Applicable.

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/ Organizations	None.	None.	None.	Not Applicable.

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)
3.	Resident Surveys	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p> <p>County wide</p>	Placed the Resident Survey on the County's website and emailed surveys to agencies/ organizations. In addition, they were passed out at public hearing and agencies/ organizations meetings.	The County received 102 completed resident surveys. The tabulations of the Resident Surveys are in the Exhibit section of this Consolidated Plan.	All comments were accepted.	https://www.surveymonkey.com/r/2019LehighCounty

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.	Agency/ Organization Surveys	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Agencies/ Organizations</p>	The agency/ organization surveys were sent out to agencies/ organizations in the County.	A summary of the survey responses and meeting minutes can be found in the Exhibit section of this Consolidated Plan.	All comments were accepted.	Not Applicable.

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)
5.	CARES Act Substantial Amendment # 3 - Newspaper Ad	Minorities Persons with disabilities Non-targeted/ broad community Residents of Public and Assisted Housing Agencies/ Organizations	On Wednesday, July 27, 2022, Lehigh County published the CARES Act Substantial Amendment Public Hearing Notice in the "Morning Call."	None.	None.	Not Applicable.

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)
6.	CARES Act Substantial Amendment # 3 - Public Meeting	<p>Minorities Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Agencies/ Organizations</p>	<p>The CARES Act Substantial Amendment # 3 Public Meeting was held on Friday, July 29, 2022 at 11:30 AM to discuss the CARES Act Substantial Amendment # 3 for the County.</p>	<p>Meeting minutes can be found in the appendix section of this Annual Action Plan – Substantial Amendment.</p>	None.	Not Applicable.

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

Lehigh County used the HUD Comprehensive Housing Affordability Strategy (CHAS) data, which provides statistical data on housing needs, to prepare its estimates and projects. The tables in this section have been prepopulated with HUD data sets, based on the American Community Survey (ACS) 2011-2015 Five Year Estimates, and the 2010 U.S. Census. This data is the most current information available to assess housing needs, homeless needs, special needs, social service needs, economic development needs, etc.

Lehigh County is part of the Eastern PA Continuum of Care. Lehigh County is a member of the CoC. Data for the development for the homeless needs section was obtained from consultation with the CoC and member agencies that serve Lehigh County, such as Valley Youth House, Turning Point of the Lehigh Valley, Lehigh Valley Conference of Churches, the YMCA of Lehigh County, the Salvation Army, and Catholic Charities.

Additional needs for Lehigh County were obtained from input and interviews with various social service agencies, housing providers, County staff, and survey responses.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The population of Lehigh County is rapidly increasing. In 2010, the population of Lehigh County was 350,164 and it rose to 368,100 in 2018, which was the most recent population estimate. This is an increase of 5.1% over the last eight (8) years. The number of households in Lehigh County in 2010 was 142,812 and increased to 146,242 in 2017, which was an increase of 2.4% over the last seven (7) years. The supply of housing increased at a lower rate than the population of Lehigh County, thus contributing to the housing shortage.

Furthermore, the median income of the area increased by 20% from \$53,551 to \$56,117. This increase in median income represents a change in nominal dollars and not a change in real dollars. In order to calculate the change in real dollars, the Consumer Price Index is used to calculate the inflation rate for a given period. Between 2000 and 2015, the cumulative inflation rate was approximately 38.5%, meaning that the \$53,551.00 median income in 2000 would be \$74,168.14 if it were expressed in 2015 dollars. By taking into consideration the rate of inflation, the median income in Lehigh County has not kept up with the rate of inflation, and has actually remained stagnant since 2000.

Lehigh County became a Federal Entitlement in 2007. The County contains the entire City of Allentown, which is an entitlement community itself, and a portion of the City of Bethlehem, which is also an entitlement community. Because Lehigh County was not a Federal entitlement in the base year of 2000, its Census numbers include the other entitlement communities within the County: the City of Allentown and a portion of the City of Bethlehem while the 2015 population only includes the Lehigh County entitlement community. For this reason, Lehigh County incorrectly appears to have lost population below. However, the population and number of households recorded below for 2015 can be taken to reflect the correct population and number of households in Lehigh County outside of the City of Allentown and the portion of the City of Bethlehem in Lehigh County.

Demographics	Base Year: 2000	Most Recent Year: 2015	% Change
Population	349,497	214,055	-39%
Households	129,889	82,875	-36%
Median Income	\$53,551	\$56,117	5%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	6,075	7,210	13,140	9,325	47,125
Small Family Households *	1,593	1,509	4,230	3,545	26,470
Large Family Households *	138	247	928	786	4,210
Household contains at least one person 62-74 years of age	1,526	1,684	3,408	2,322	9,769
Household contains at least one person age 75 or older	1,388	2,809	3,054	1,108	2,726
Households with one or more children 6 years old or younger *	852	488	1,452	1,349	5,104
* the highest income category for these family types is >80% HAMFI					

Table 6 - Total Households Table

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables**1. Housing Problems (Households with one of the listed needs)**

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	165	140	270	40	615	10	0	68	35	113
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	40	10	20	0	70	10	0	0	25	35

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	10	22	95	40	167	0	20	44	8	72
Housing cost burden greater than 50% of income (and none of the above problems)	1,989	929	278	45	3,241	1,835	1,488	1,489	514	5,326
Housing cost burden greater than 30% of income (and none of the above problems)	222	908	1,804	429	3,363	388	1,546	2,620	1,522	6,076
Zero/negative Income (and none of the above problems)	181	0	0	0	181	276	0	0	0	276

Table 7 – Housing Problems Table

Data Source: 2011-2015 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	2,204	1,104	654	125	4,087	1,855	1,508	1,609	582	5,554

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having none of four housing problems	938	1,459	3,590	2,335	8,322	634	3,137	7,290	6,275	17,336
Household has negative income, but none of the other housing problems	181	0	0	0	181	276	0	0	0	276

Table 8 – Housing Problems 2

Data 2011-2015 CHAS

Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	791	617	752	2,160	569	565	1,656	2,790
Large Related	53	103	200	356	58	107	290	455
Elderly	737	713	753	2,203	1,212	2,017	1,681	4,910
Other	742	542	661	1,945	413	329	514	1,256
Total need by income	2,323	1,975	2,366	6,664	2,252	3,018	4,141	9,411

Table 9 – Cost Burden > 30%

Data 2011-2015 CHAS

Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	757	270	79	1,106	534	426	593	1,553
Large Related	53	39	0	92	54	73	104	231
Elderly	588	395	189	1,172	894	775	555	2,224
Other	673	304	74	1,051	373	185	241	799
Total need by income	2,071	1,008	342	3,421	1,855	1,459	1,493	4,807

Table 10 – Cost Burden > 50%

Data 2011-2015 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	50	22	115	40	227	0	20	34	29	83
Multiple, unrelated family households	0	0	0	0	0	10	0	10	4	24
Other, non-family households	0	10	10	0	20	0	0	0	0	0
Total need by income	50	32	125	40	247	10	20	44	33	107

Table 11 – Crowding Information – 1/2

Data 2011-2015 CHAS
Source:

6. Households with Children Present

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Households with Children Present	-	-	-	-	-	-	-	-	-	-

Table 12 – Crowding Information – 2/2

Data Source: 2011-2015 CHAS

Describe the number and type of single person households in need of housing assistance.

According to the 2011-2015 American Community Survey (ACS), there were 82,875 households in 2015 in Lehigh County. Based on this number of households, 37,347 (45.0%) of all households were single person households living alone. 65% of households with at least one person over the age of 75 have an income that is between 0% to 80% of the Household Median Income. Based on the ACS estimates, 41% of all persons with a cost burden on housing of >50% are classified as elderly. The County will need to assist in obtaining funding and collaborating with housing service and elderly support agencies to provide programs, activities, and accommodations for its elderly population.

Of the 2,802 families/individuals on the public housing waiting list according to the Lehigh County Housing Authority as of June 30, 2019 (last waiting list available), 1,877, or 67%, are single-person households, and 1,877, or 67%, are Extremely Low Income households, and 782, or 26%, are Very Low Income households. This shows that there is a shortage of subsidized, affordable housing for single-person households, many of whom are elderly, disabled, and living on fixed-incomes.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Disabled Population – Based on the 2011-2015 CHAS Data and the 2011-2015 ACS Data, it is estimated that 31.5% of all disabled renters have a housing problem that includes cost overburdened by 30% or another type of housing problem, and 25.2% of disabled homeowners have a housing problem that includes cost overburdened by 30% or another type of housing problem. From these estimates, it can be deduced that approximately 2,065 disabled renters have a housing problem and approximately 2,371 disabled homeowners have a housing problem. A breakdown of the types of disability in the County is as follows: hearing difficulty = 11.9% (of the total civilian noninstitutionalized population in Lehigh); vision difficulty = 1.89%; cognitive difficulty = 2.14%; ambulatory difficulty = 5.91%; self-care difficulty = 5.39%; and independent living difficulty = 1.88%.

Victims of Domestic Violence, Dating Violence, sexual assault, and stalking – Based on consultation with Turning Point of the LV, it is estimated that more than 2,600 persons in the Lehigh Valley experience domestic violence, dating violence, sexual assault, and stalking per year, and are in need of housing assistance.

The clients that Turning Point of the LV works with need help with issues relating to: housing; jobs; child care; access to a vehicle or transportation; proficiency in the English language; mental health services; doctor/dentist/medical care; budgeting classes; ongoing support (from friends and family); parenting classes/groups/skills; counseling services; etc.

Turning Point of the LV provides temporary housing and connections to employment opportunities for victims of domestic violence. Often times, domestic violence victims require job training, child care, or additional private transportation to make these employment opportunities safe and viable. Housing options for domestic violence victims are slim in Lehigh County due to the lack of affordable housing, and the waiting lists are long. The salary needed for an affordable unit is difficult for a person to earn if they are in a transient situation and victims frequently have limited work histories and credit. There is a need for additional housing and job training for this population.

What are the most common housing problems?

The largest housing problem in Lehigh County is housing affordability. According to the 2011-2015 ACS data, an estimated 44.4% of all renter households are cost overburdened by 30% or more, and an estimated 42.0% of all owner households are cost overburdened by 30% or more. Approximately 51% of owner occupied households with a mortgage are cost overburdened by 30% or more, and an estimated 44% of owner occupied households are cost overburdened by 50% or more.

In consultations, interviews and surveys, the lack of affordable, decent, sustainable housing is the biggest issue in Lehigh County. The lack of affordable housing cuts across demographic groups and affects everyone in the County. There are populations of elderly residents that are affected by the lack of accessibility in the County's housing stock. There are also immigrant populations that are affected by the lack of affordable housing. A large portion of this population rents and faces issues with decent housing and interiors of housing that are code compliant. Because the housing stock is older, most single family residential structures are two stories in height, therefore, are not accessible to the elderly and people with disabilities.

Older properties in the City of Allentown are more affordable than properties outside the City within Lehigh County. Many of these properties are rentals and homeownership is more common outside of the City of Allentown in Lehigh County. Because of the large number of homeowners, there is a need for homeowner rehabilitation as residents of Lehigh County age in place. There is substantial demand for owner-occupied housing and many residents want to purchase a home in the County. Downpayment assistance programs have the potential to assist these populations.

There is also a substantial need for rental housing in the County. There are fewer rental units in the County, but renting is typically more affordable. Additional rental housing units would provide more

affordable housing for all demographics of County residents. The quality of the rental housing is less than ideal, because rehabilitation and maintenance are not always being performed with in older parts of the County and City. In addition, a lot of these rentals are not accessible for the elderly and disabled because there are no elevators.

Are any populations/household types more affected than others by these problems?

The population increase in Lehigh County and subsequent high demand for housing have caused all populations to be affected by the lack of affordable housing. Families are the most affected by this lack of affordable housing, because new units in the County are typically one-bedroom or two-bedroom apartments. Many of the immigrants that come to the County do not have bank accounts and struggle to make downpayments, though this is changing and more immigrants that have spent less than five (5) years in the United States have been applying for loans and purchasing homes. As a result of these factors, there is a need for education and outreach on landlord/tenant rights and fair housing rights in both English and in Spanish.

Another group affected by the lack of affordable housing are the homeless and persons at-risk of becoming homeless, including persons who are victims of domestic violence. Most of the population that are at-risk of becoming homeless are facing a housing cost overburden problem and would benefit from emergency housing assistance for rent and/or mortgage payments and utilities to help them avoid homelessness. There are short term assistance options available, but these are scarce and hard to come by, especially if it is needed by the same person more than once. People transitioning from shelter care, prison, or a health care facility are also affected by the cost overburden housing problem, particularly when trying to secure a source of income to maintain housing.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

According to the Lehigh County Conference of Churches, Catholic Charities, Valley Youth House, and other organizations that provide services to the homeless, characteristics and needs of both low-income individuals and families with children who receive services at local shelters are as follows:

Individuals: Mental Health issues; criminal histories severely limiting job opportunities; lack of sustainable living wages; lack of training for available jobs; evictions; lack of a support system and/or burned bridges with friends and family; a lack of transportation; and substance abuse issues.

Families with Children: Single mothers; no means of transportation; no affordable childcare; a lack of education; a lack of job skills; evictions; unemployed, or employed at a low paying job that cannot sustain a family on one income; and no family support and/or burned bridges with friends and family.

Formerly Homeless Individuals / Families Receiving Rapid Re-Housing Assistance Nearing Termination:

Further assistance to this target group may be provided for a limited time if an event should occur through no fault of their own and if required documentation can be provided. Examples include hospitalization due to illness or surgery, official lay-off from employment, or a sudden and drastic cut in work hours.

Many residents of the area across all demographics are cost overburdened, and a small financial hardship can affect these people and force them to become homeless. The high cost of rent plays a significant role in making it difficult for residents to remain in their homes. Most low-income families and persons at-risk of becoming homeless, including persons who are victims of domestic violence, are facing eviction due to a housing cost overburden problem, and would benefit from emergency housing assistance for rent and/or mortgage payments and utilities to help them avoid homelessness. These populations can also benefit from job training to gain the skills for permanent employment, and transportation to get to work.

The Eastern PA CoC has seen a 4% increase in the number of homeless people that have exited to Permanent Housing who had previously been housed in Emergency Shelter, Transitional Housing, and Rapid Rehousing. Part of this increase comes from a diversion strategy which helps families identify housing options and supports quickly to return to housing. The CoC will implement Landlord Engagement Training to build relationships with landlords and train them on the Housing First Approach. The CoC has trained case managers to ensure that they address those in Rapid Rehousing using best practices including housing first, housing focused case management, harm reduction, motivational interviewing, and trauma-informed care.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The McKinney-Vento Act established categories in the Homeless Definition Final Rule for the At Risk Group. The Act was amended to include assistance to those at risk of homelessness who did not meet the definition in the Final Rule. These include: 1) individuals and families; 2) unaccompanied children and youth; and 3) families with children and youth.

According to the CoC, the methodology used to generate estimates is based on historical incidence, such as the yearly Point in Time Counts and Homeless Management Information System (HMIS) data, which is a local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. Providers participating in the PA HMIS are required to collect and record certain data elements for all new and continuing clients in the HMIS. According to the 2017 PA HMIS Policy, those at-risk of homelessness can be defined in this manner:

Imminent Risk of Homelessness - Persons who are housed and at imminent risk of losing housing include people who at program entry or program exit are experiencing one of the following:

- Being evicted from a private dwelling unit (including housing provided by family/friends);
- Being discharged from a hospital or other institution;
- Living in a hotel or motel and lacking the financial resources to remain housed in the establishment; or
- Living in housing that has been condemned by housing officials and is no longer considered meant for human habitation.

Additionally, a person residing in one of these places must also meet the following two conditions:

- Have no appropriate subsequent housing options identified; and
- Lack the financial resources and support networks needed to obtain immediate housing or remain in existing housing.

Unstably housed and at-risk of losing their housing - persons who are housed and at-risk of losing housing include people who at program entry or program exit:

- Are in their own housing or doubled up with friends or relatives and at-risk of losing their housing due to high housing costs, conflict, or other conditions negatively impacting their ability to remain housed;
- Living in a hotel or motel and lacking the financial resources to remain housed in the establishment; and
- Lack the resources and support networks needed to maintain or obtain housing.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

The high cost of decent, safe, sound, and accessible housing in the County creates instability and an increased risk of homelessness for lower income families in the area. Many families are living from paycheck to paycheck and are paying over 30% of their income for housing, which may or may not be decent, safe, sound, and accessible.

Contributing housing characteristics to instability and increased risk of homelessness include: untreated/undiagnosed mental health issues; substance abuse issues; physical disabilities, rendering a person unable to work, but not currently receiving Social Security Disability benefits; single and unemployed mothers expecting another child; poor rental and credit issues; and unemployed, often troubled, young adults aging out of foster care, who are made to leave the home by the foster parents.

According to housing providers, other housing characteristics that add to instability is the lack of financial literacy and basic life skills. There is a need to teach basic living skills like managing budgets, managing time, and living from crisis to crisis. Residents also need basic housing education to learn how to maintain stable housing.

Discussion

The population of Lehigh County is increasing, and many residents are facing the effects of increased housing costs and a shortage of decent, safe, sound, and accessible housing that is affordable to low income persons.

Broadband Needs:

Through phone interviews, Lehigh County determined that the rural portions of Lehigh County are the regions most affected by a lack of broadband internet access. Each state has a plan or is charged with developing a plan for broadband access. In the Commonwealth of Pennsylvania, the Department of Community and Economic Development's role is to increase broadband access, and there is no countywide plan. Housing stock in the unincorporated, rural areas of the County require additional broadband access to connect them to the broadband in the City of Allentown and the Boroughs of the County.

DRAFT #3

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

During the planning process for the preparation of Lehigh County's Five Year Consolidated Plan, an evaluation and comparison was made to determine if any racial or ethnic group is disproportionately affected by housing problems in the County. Disproportionately greater need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole. The total number of White Households in Lehigh County is 73,466 households (88.7%); the number of Black/African American Households is 1,623 households (1.9%); the number of American Indian and Alaska Native Households is 94 households (0.1%), the number of Asian Households is 2,920 households (3.5%); the number of Native Hawaiian and Other Pacific Islander Households is 0 households (0.0%), and the total number of Hispanic Households is 3,989 households (4.8%).

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,659	958	457
White	3,703	734	367
Black / African American	350	15	0
Asian	185	110	60
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	405	89	39

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,043	2,124	0
White	4,538	1,969	0
Black / African American	154	10	0
Asian	68	40	0
American Indian, Alaska Native	0	30	0
Pacific Islander	0	0	0
Hispanic	274	55	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,699	6,453	0
White	5,754	5,942	0
Black / African American	189	40	0
Asian	113	114	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	588	254	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,652	6,680	0
White	2,367	6,010	0
Black / African American	75	94	0
Asian	14	143	0
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0
Hispanic	99	349	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

The racial composition of Lehigh County households, according to the 2011-2015 American Community Survey data, was 88.7% White; 4.8% Hispanic or Latino; 3.5% Asian; and 1.9% African American. In the 0%-30% of Area Median Income category, 61% of White households had one or more housing problem. The White population also has a large need in terms of housing problems in the 50-80% of Area Median Income category with 43.7% of total households in that category.

Also of note are the groups of Hispanic households at 0%-30% of Area Median Income, with a percentage of 7.2% of households that have one or more housing problems, and African American/Black households at 0%-30% with 6.2% of households that have one or more housing problems. Though no group meets the ten-percentage point threshold for disproportionate need, these groups are notably higher than the proportions of the population in the County as a whole.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

During the planning process for the preparation of Lehigh County's Five Year Consolidated Plan, an evaluation and comparison was made to determine if any racial or ethnic group is disproportionately affected by severe housing problems in the County. Disproportionately greater need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole. Severe housing problems are distinguished from housing problems by a threshold of more than 1.5 persons per room as opposed to more than 1 person per room for overcrowding, as well as a cost burden threshold of over 50% of income as opposed to over 30% of income. Data detailing information by racial group and Hispanic origin has been compiled from the 2011-2015 CHAS data and the 2011-2015 American Community Survey Five Year Estimates. The following tables illustrate the disproportionate needs of Lehigh County.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,059	1,572	457
White	3,127	1,312	367
Black / African American	330	35	0
Asian	185	110	60
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	390	104	39

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,612	4,596	0
White	2,292	4,240	0
Black / African American	75	89	0
Asian	40	68	0
American Indian, Alaska Native	0	30	0
Pacific Islander	0	0	0
Hispanic	205	124	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,263	10,880	0
White	1,957	9,704	0
Black / African American	85	144	0
Asian	79	149	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	120	717	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	707	8,610	0
White	562	7,815	0
Black / African American	55	109	0
Asian	4	153	0
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0
Hispanic	14	439	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

The racial composition of households in Lehigh County, according to the 2011-2015 American Community Survey, was 88.71% White; 4.8% Hispanic or Latino; 3.5% Asian; and 1.96% Black/African American. This data set shows that 51.3% of White households with 0%-30% of Area Median Income, have one or more severe housing problems.

Also of note are the groups of Hispanic households in the 0%-30% of Area Median Income category, that make up 7.8% of all total households in the income category with one or more severe housing problems. The Black/African American population also has a need in terms of severe housing problems in the 0-30% of Area Median Income category at 8.13% of total households in that category. Though these groups do not meet the ten-percentage point threshold for disproportionate need, they are notably higher than the proportions of the population in the County as a whole.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

During the planning process for the preparation of Lehigh County's Five Year Consolidated Plan, an evaluation and comparison was made to determine if any racial or ethnic group is disproportionately affected by housing problems in the County. Disproportionately greater need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole.

The greatest housing problem facing Lehigh County is the lack of affordable housing and the fact that many of the County's lower income households are paying more than 30% of their total household income on housing related costs. The following information was noted: 12,190 White households were cost overburdened by 30% to 50%, and 7,640 White households were severely cost overburdened by greater than 50%; 753 Hispanic households were cost overburdened by 30% to 50%, and 700 Hispanic households were severely cost overburdened by greater than 50%; 343 Black/African American households were cost overburdened by 30% to 50%, and 370 Black/African American households were severely cost overburdened by greater than 50%; and lastly, 212 Asian households were cost overburdened by 30% to 50%, and 365 Asian households were severely cost overburdened by greater than 50%.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	59,608	13,546	9,131	533
White	53,254	12,190	7,640	382
Black / African American	850	343	370	60
Asian	2,283	212	365	60
American Indian, Alaska Native	94	0	0	0
Pacific Islander	0	0	0	0
Hispanic	2,497	753	700	39

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion:

A total of 12,190 White households were considered cost overburdened by between 30% and 50%, which is 90% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is above the 88.7% of the total number of households that the White category comprises. A total of 343 Black/African American households were considered cost overburdened by between 30% and 50%, which is 2.5% of the total number of households that were considered cost overburdened by between 30% and 50%. This number is slightly above the 1.9% of the total number of households that the Black/African American category comprises. A total of 212 Asian households were considered cost overburdened by between 30% and 50%, which is 1.5% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is below the 3.4% of the total number of households that the Asian category comprises. A total of 753 Hispanic households were considered cost overburdened by between 30% and 50%, which is 5.5% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is slightly above the 4.8% of the total number of households that the Hispanic category comprises.

A total of 7,640 White households were considered severely cost overburdened by greater than 50%, which is 83.6% of the total number of households that were considered cost overburdened by greater than 50%. This number is below the 88.7% of the total number of households that the White category comprises but still substantial. A total of 370 Black/African American households were considered cost overburdened by greater than 50%, which is 4.0% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is slightly above the 1.9% of the total number of households that the Black/African American category comprises. A total of 365 Asian households were considered severely cost overburdened by greater than 50%, which is 4.0% of the total cases of households that were considered cost overburdened by greater than 50%. This number is slightly higher than the 3.5% of the total number of households that the Asian category comprises. A total of 700 Hispanic households were considered severely cost overburdened by greater than 50%, which is 7.6% of the total cases of households that were considered cost overburdened by greater than 50%. This number is slightly higher than the 4.8% of the total number of households that the Hispanic category comprises.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)**Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

The racial composition of Lehigh County households, according to the 2011-2015 American Community Survey data, was 88.7% White; 4.8% Hispanic or Latino; 3.5% Asian; and 1.9% African American. There are no disproportionately impacted ethnic or racial groups (at least 10 percentage points higher than the percentage of persons as a whole) with a housing problem, severe housing problem, housing cost burden or severe housing cost burden.

When examining the percentage of each racial or ethnic group that have a housing problem, severe housing problem, or are housing cost overburdened, compared to that racial or ethnic group overall, a different picture presents itself. According to the 2011-2015 CHAS data, 16.6% of all White households, 21.13% of Black/African American households, 0.0% of American Indian and Alaska Native households, 7.26% of Asian households, and 18.88% of Hispanic households are cost-overburdened by 30%-50%, while 10.4% of White households, 22.8% of Black households, 12.5% of Asian households, and 17.55% of Hispanic households were cost overburdened by over 50%. When examining housing problems, 52.1% of White households, 82.8% of Black/African American households, 44.8% of Asian households, and 63.4% of Hispanic households have a housing problem. The populations most affected by cost overburdens are Black/African American households and Hispanic households. The numbers are lower for severe housing problems, with 25.3% of White households, 59.1% of Black/African American households, 36.3% of Asian households, and 33.8% of Hispanic households are experiencing severe housing problems. Overall, these numbers show that African American/Black households in Lehigh County are much more likely to experience a housing problem than to be cost overburdened, and that minority households in general are more likely to be cost overburdened and have a housing problem than White households.

If they have needs not identified above, what are those needs?

Within Lehigh County, there is no racial or ethnic group that has a disproportionate need in regards to housing problems. However, this analysis excludes the Cities of Allentown and Bethlehem. Much of the low-quality rental housing with substantial housing problems in Lehigh County lies outside its jurisdiction in the Cities of Allentown and Bethlehem. Though there may be disparities and disproportionate needs in the County, they are concentrated in the County's core cities. The County can mitigate these problems by working to create affordable housing throughout its jurisdiction.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

There are no Racially Concentrated Areas of Poverty or Ethnically Concentrated Areas of Poverty (RCAPS or ECAPS) in Lehigh County's jurisdiction.

Some areas have higher concentrations of minorities than the County as a whole. The following areas have higher rates of minority residents when compared to the County as a whole according to American Community Survey data: Fountain Hill Borough with 20.78% Hispanic and 6.94% Black; Macungie Borough with 9.58% Hispanic; Slatington Borough with 5.58% Hispanic; Lower Macungie Township (Ancient Oaks CDP) with 6.22% Asian, 5.78% Hispanic, and 3.78% Black; and Whitehall Township (Fullerton CDP) with 21.04% Hispanic, 9.55% Asian, and 7.26% Black. While these racial cohorts are slightly concentrated within Lehigh County, the White population is fairly evenly spread out throughout the County.

According to National Origin maps and data, there is a higher rate of concentration of residents by national origin than by race. A Vietnamese population is concentrated in Lower Macungie Township (Ancient Oaks CDP), Macungie Borough, Upper Saucon Township, and Whitehall Township (Hokendauqua CDP). A German population is concentrated in Fogelsville, Whitehall Township (Fullerton CDP), Lower Macungie Township (Ancient Oaks CDP), and Upper Saucon Township. Residents of Chinese descent are concentrated in Coopersburg Borough, Upper Macungie Township, and Catasauqua Borough. Descendants of the Dominican Republic are concentrated in the areas around Emmaus Borough, Whitehall Township (Hokendauqua CDP), and Whitehall Township (Fullerton CDP). An Indian population is concentrated in North Whitehall Township (Schnecksville Section), Alburtis Borough, and the immediate areas just north and west of the City of Allentown.

Attached to this Plan are maps which illustrate Lehigh County's demographics which are included in the Exhibits section of the Plan.

NA-35 Public Housing – 91.205(b)

Introduction

The Lehigh County Housing Authority's mission 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." The Lehigh County Housing Authority is not rated as a "troubled" agency by HUD.

The Lehigh County Housing Authority owns and professionally manages six (6) public housing communities and two (2) publicly subsidized housing communities, and administers the Section 8 Housing Choice Vouchers for the County. Three (3) of these public housing communities are senior apartment communities: George Dilliard Manor in Slatington; Ridge Manor in Emmaus; and Clarence Aungst Towers in Fountain Hill. The number of units in each community are as follows:

- 7th Street Village – 25 family units
- George Dilliard Manor – 75 elderly units
- Coplay Family – 25 units
- Ridge Manor – 75 elderly units
- Clarence Aungst Towers – 75 elderly units
- Fountain Hill – 75 Senior units and 14 family units

Many of the residents of these communities are 0%-30% AMI, and the Housing Authority faces difficulties reaching potential tenants for public housing with higher incomes. Generally, potential tenants above 30% AMI would prefer vouchers.

The waiting lists for both public housing and Section 8 Housing Choice Vouchers are closed. The breakdown of the waiting lists are 67% single-person households, 5% two-person households, 4% three-person households, and less than 1% four-person or more households, for a total of 2,802 households as of June 30, 2019 on the public housing waiting list (the last waiting list available). The breakdown of the waiting lists are 7% elderly households and 39% disabled households. 93% of households on the Section 8 Housing Choice Voucher waiting list are Extremely Low Income for a total of 1,084 households as of June 30, 2019 on the Section 8 Housing Choice Vouchers waiting list (the last waiting list available). Public housing occupancy is at 96.2%. The Lehigh County Housing Authority does not support any homeownership initiatives.

The Lehigh County Housing Authority's development division is known as Valley Housing Development Corporation. Valley Housing Development Corporation has built 289 units since its creation in 1983. These units are managed by the Housing Authority. 69 of the units are family units and the remaining 220 units are for elderly residents. Lehigh County owns an additional 433 units that are not Federally assisted.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	15	289	1,401	26	1,365	10	0	0

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	6,676	13,905	12,885	9,396	12,896	20,394	0
Average length of stay	0	5	6	6	3	6	1	0
Average Household size	0	1	1	1	1	1	1	0

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	0	1	1	1	0	0	0
# of Elderly Program Participants (>62)	0	1	209	487	0	484	3	0
# of Disabled Families	0	6	33	533	15	513	5	0
# of Families requesting accessibility features	0	15	289	1,401	26	1,365	10	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	12	265	1,222	23	1,192	7	0	0
Black/African American	0	2	21	157	3	151	3	0	0
Asian	0	1	2	15	0	15	0	0	0
American Indian/Alaska Native	0	0	1	4	0	4	0	0	0

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Pacific Islander	0	0	0	3	0	3	0	0	0
Other	0	0	0	0	0	0	0	0	0

* includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	2	36	272	8	263	1	0	0
Not Hispanic	0	13	253	1,129	18	1,102	9	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The Lehigh County Housing Authority has been found in compliance with Section 504. No additional compliance is needed.

The Lehigh County Housing Authority currently has 15 fully accessible units and 11 semi-accessible units. Additionally, LCHA owns thirty-five accessible units in non-Federally assisted properties.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The most immediate needs of Public Housing residents is for employment, training, and transportation for shopping and medical services. The immediate needs of Housing Choice Voucher Holders is similar, but there is a lack of safe, sound, and affordable housing units that are available for rent and within the FMR allowance.

According to LCHA's 2019 Five Year and Annual Plan, the strategies for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year include preserving quality housing for the very low-income (50% or below AMI) and extremely low-income (30% or below AMI) residents in the County, in addition to expanding housing choices for the elderly, disabled, and Voucher Holders. With public housing occupancy at 96.2%, and a Housing Authority policy to keep site-based public housing waiting lists open, there is more demand than supply. Also, there is a shortage of availability of Section 8 Vouchers, which is evidenced by the fact that the waiting list is currently closed, and has been closed since August 16, 2016.

The Family Self-Sufficiency (FSS) Program gives Section 8 Voucher Holders the opportunity to set and reach goals that they set for themselves and their families, as well as save a significant amount of money. Section 8 Voucher Holders may also use their vouchers to realize the American dream of becoming a homeowner. Both of these opportunities are available to Section 8 Holders who choose to become participants in Section 8's Family Self-Sufficiency Program. There are two parts to the program. The first part of the program is the Self-Sufficiency program where participants have the opportunity to work towards and meet goals that they set for their families, as well as save money that will become theirs when they have completed their goals. The second part of the program is the Homeownership Program. In this part of the program, a Section 8 participant can choose to use his or her Section 8 Voucher to assist with the purchase and payment of a home.

How do these needs compare to the housing needs of the population at large

These housing needs are similar to the population at large based on the fact that there is a shortage of decent, safe, and sanitary housing in Lehigh County.

LCHA will continue to provide quality affordable housing by preserving, maintaining and promoting the 239 units of public housing and affordable housing. The Authority will work within HUD funding commitments to maximize the number of families assisted by the Housing Choice Voucher Program and

other programs. LCHA will continue its commitment to remain a part of local and affordable housing committees where the objective is to seek out methods of expanding affordable housing for seniors, low income families and individuals with disabilities. LCHA will continue to work with local, county, state and federal government to access programs and continue dialogue to improve programs that provide or have the potential to develop new or preserve existing affordable housing opportunities.

Discussion

Lehigh County has identified the need for affordable housing that is decent, safe, and sanitary. The Lehigh County Housing Authority is a valuable resource in addressing that need. There is a significant number of households in the County that are at or below 50% of AMI and are affected by housing problems, severe housing problems and housing cost burdens.

LCHA will continue achieving high-performer standards of Federal programs. The LCHA will continue to improve communication with residents and provide a secure and friendly living environment that fosters tenant satisfaction and well-being.

LCHA will also continue to maintain their developments through preventative and ordinary maintenance as well as the capital fund program so that they remain quality housing for those in their community well into the future.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Lehigh County is part of the Eastern PA Continuum of Care, which is part of the Balance of State CoC. The Balance of State is split into five regional groups, called RHABs, each consisting of the governance structure for a CoC. Each of the RHABs/CoCs identify regional and local homeless issues; coordinate planning for projects; identify housing gaps and needs, strategies and priorities; review, select, and monitor projects; participate in the completion of the Exhibit 1 application; monitor Homeless Management Information System (HMIS) participation and implementation issues; and help coordinate and follow up on the point-in-time count and AHAR (Annual Homeless Assessment Report). Committees of the RHAB/CoC review and rank new and renewal projects annually. Finally, the RHABs/CoCs provide input and feedback to the PA Homeless Steering Committee on policies, priorities, and issues of statewide significance.

The Homeless Steering Committee consists of a collaboration between various State Agencies, Entitlement Grantees, and direct Homeless Service Providers split into two groups: An Entitlement Committee representing direct HUD-entitlement Jurisdictions, and the Balance of State. The roles of the Steering Committee are to identify & address policy issues, set state priorities, ensure coordination among public and private agencies, and maximize use of mainstream and state resources. It also is the lead entity in the Ten Year planning process; conducting research, coordinating the Continuum of Care (CoC) application process, and providing technical assistance to 18 regional Continuums of Care and individual grantees. It provides updates on discharge plans and state disaster planning. During monthly meetings the Regional Housing Advisory Board (RHAB) and Entitlement Committee Chairs report on regional, municipal and county activities and concerns. The group also addresses issues and topics of common interest that impact state and local homeless systems.

The Lehigh Valley RHAB addresses regional issues related to homelessness in both Lehigh and Northampton Counties. The City of Allentown coordinates with the Lehigh Valley RHAB to use its ESG funding to meet the needs of those in these Counties. Coordinated Entry in the region has been concentrated in the City of Allentown to address the high populations of homeless youth and youth at risk of becoming homeless.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	51	327	378	0	69	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	161	56	217	0	34	0
Chronically Homeless Individuals	28	15	43	9	0	0
Chronically Homeless Families	5	0	5	2	0	0
Veterans	19	1	20	10	0	0
Unaccompanied Child	12	7	19	0	9	0
Persons with HIV	0	0	0	0	0	0

Table 36 - Homeless Needs Assessment

Data Source Comments: Eastern PA CoC 2019 Point In Time Count Summary

Indicate if the homeless population is:	Has No Rural Homeless
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If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Chronically homeless individuals and families – The Chronically Homeless are defined as an individual or family that is homeless and lives or resides in a place not meant for human habitation, a safe haven or in an emergency shelter. They have been homeless and living there continually for at least one year or on at least four separate occasions in the last three years. They have an adult head of household (or a minor head of household if no adult is present in the household) with a diagnosable substance use disorder, serious mental illness, developmental disability (as defined in Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C 15002)), post-traumatic

stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability, including the co-occurrence of two or more of those conditions. The CoC has PSH beds dedicated for the chronically homeless, and they have adopted a policy to prioritize chronically homeless for PSH beds at turnover. According to the Point-In-Time count data, it was reported that there were 18 chronically homeless persons in 2017, 19 in 2018, and 28 in 2019. There were 5 chronically homeless families with children in 2017, 3 in 2018, and 5 in 2019 in Lehigh County. Because there is an increase in the number of chronically homeless individuals in the area, there is a need for increased outreach and services for the chronically homeless adult population.

Families with children – The Point In Time count for 2019 reported 51 homeless households with children in Lehigh County, for a total of 166 persons. There were approximately the same number of families and persons (49 and 157, respectively) in 2017, but numbers were higher in 2018 at 64 homeless households and 201 persons. Of the homeless households in 2019, none were unsheltered, but 8 families (22 persons) were in transitional housing and the remainder were in emergency shelter. Therefore, it can be estimated that there is a need for housing for 43 families (with 144 persons).

Veterans and their families – The Lehigh Valley Homeless Veteran Task Force was created in February 2015. The Lehigh County Office of Veterans Affairs coordinates the Task Force. The main SSVF provider serving Lehigh and Northampton Counties is Catholic Charities. This is the major resource for rapid re-housing and homelessness prevention. This organization has the financial resources to provide rental assistance immediately to qualifying veterans. Veterans are also linked to agency Support Coordinators by shelters and community resource providers. The Allentown Housing Authority administers the HUD-VASH program for the Lehigh Valley. This program is coordinated through the Wilkes-Barre VA Medical Center. There were 8 homeless veterans in 2017; 9 homeless veterans in 2018; and 19 homeless veterans in 2019. The increase in homeless Veterans in the area shows the need to restore funding for the programs that had previously been successful in addressing veteran homelessness.

Unaccompanied youth – Teens aging out of foster care, and young adults in the 18-24 transition stage are sometimes hard to locate. The Eastern PA CoC has aggressively targeted youths experiencing homelessness in response to their prevalence in Lehigh County. Ending homelessness among unaccompanied youth will require increased discharge planning from systems of care, family reunification services, positive youth development, independent living programs, youth-centered strategies, and targeted outreach. There were 12 unaccompanied youths counted in the 2019 Point-in-Time count for Lehigh County, which was a decrease from 21 in 2018. All unaccompanied youths counted were aged 18-24.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	149	42
Black or African American	87	11
Asian	0	1
American Indian or Alaska Native	1	0
Pacific Islander	1	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	108	7
Not Hispanic	155	49

Data Source Comments: Eastern PA Continuum of Care

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The CoC has reallocated its projects to better assist families with children that experience homelessness. There were 26 transitional housing projects that were converted to rapid re-housing to address the need of this population. The Point-In-Time count for 2019 indicated that there were 51 homeless households with children in Lehigh County, for a total of 166 persons. There were approximately the same number of homeless households and persons (49 and 157, respectively) in 2017, as in previous years, but numbers were higher in 2018 at 64 homeless households with 201 persons. Of the homeless households in 2019, none were unsheltered, but 8 families (22 persons) were in transitional housing and the remainder were in emergency shelters. Therefore, it can be estimated that there is a need for housing for 43 families (with 144 persons).

The number of homeless Veterans in Lehigh County has increased from 8 in 2017, to 9 in 2018, and 19 in 2019. Lehigh County had a viable program for addressing Veteran homelessness in 2017 and 2018. Because the program was effective, it was determined that the problem of Veteran homelessness had decreased substantially enough to end the program in the County and the funding was cut by the Federal government. The rise in Veteran homelessness in 2019 is a result of those funding cuts.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Throughout the Eastern PA CoC, the majority of homeless individuals and families, both sheltered and unsheltered, are white. Approximately 15% of homeless individuals are Black or African American throughout the Eastern PA CoC. All other racial groups, as identified by the Census, experience homelessness less prevalently in the Eastern PA CoC. One (1) homeless person was Asian, Nine (9) homeless persons were American Indian or Native Alaskan, and five (5) homeless persons were Native

Hawaiian or Other Pacific Islander. 21 persons were considered Multi-Racial. Approximately 18% of homeless individuals and families throughout the Eastern PA CoC were Hispanic or Latino.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Unsheltered Homelessness would refer to the segment of a homeless community who do not have ordinary lawful access to buildings in which to sleep, as referred to in the HUD definition as persons occupying "place not meant for human habitation", (examples: bus stop, beach, riverbed, van, RV, sidewalk). Many of the unsheltered homeless suffer from substance abuse and/or mental illness, and are reluctant to abide by the rules of shelters.

Sheltered Homelessness would refer to those in an emergency shelter, in transitional housing, or are exiting an institution where they temporarily resided lacking a fixed night time residence. People will be considered homeless if they are exiting an institution where they have resided for up to 90 days (it was previously 30 days). People who are losing their primary night time residence, which may be a motel, hotel or a doubled up situation within 14 days and lack resources or a support network to remain in housing, are considered sheltered homeless as well. The sheltered homeless typically do not have a steady source of income or any source of income.

The Point-In-Time Count for Lehigh County in 2019 reported a total of 327 homeless persons and 206 homeless households. Of these, only 56 persons (51 households), or 17%, were unsheltered. There were 53 persons (39 households) in transitional housing, and 218 persons (116 households) that were housed in emergency shelters. There were 51 homeless families with children, 28 chronically homeless families, 12 unaccompanied youths, and no persons with HIV/AIDS were counted in 2019. Of the 327 homeless people counted, 28 were considered chronically homeless, and 13 chronically homeless individuals were sheltered in emergency shelters. There were 19 Veterans (1 unsheltered), 6 with severe mental illness (none were unsheltered), 11 that were chronic substance abusers (5 unsheltered), 21 victims of domestic violence (1 unsheltered), and 70 with a disability of some kind. Of the 70 homeless with a disability of some kind, 20 (28.6%) were unsheltered. This indicates a need for greater outreach and shelter/housing options for these special needs groups.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

The assessment of non-homeless special needs includes the following:

- Elderly persons (age 65 years and older)
- Frail elderly
- Persons with mental, physical and/or developmental disabilities
- Persons with alcohol or other drug additions
- Persons with HIV/AIDS and their families
- Victims of domestic violence, dating violence, sexual assault, and stalking

The housing need of each of these groups was determined by consultation with social service providers and statistical information provided by social service provider agencies.

Describe the characteristics of special needs populations in your community:

Elderly Persons are defined as persons who are age 65 years and older. According to the 2013-2017 American Community Survey, elderly persons represent 15.9% of the County's total population. Approximately 7.3% of the elderly population are age 75 years and older. In addition, roughly 56.6% of the total elderly population lives alone as a single person household (24.2% of the total number of households in the County).

Frail Elderly are those persons who are elderly and have a disability, ranging from a loss of hearing, vision difficulty, cognitive difficulty, ambulatory problems, and lack of self-help skills. It is estimated that approximately 35.0% of the total elderly population may be classified as frail elderly.

Persons with mental, physical and development disabilities, according to the ACS data for 2013-2017, persons with a disability comprise 13.9% (49,395 persons) of the total population of Lehigh County.

Persons with HIV/AIDS and their families comprise a small percentage of the County's overall population, but they are served by a network of service providers. Roughly 60% of those seeking help through Comprehensive Health Services of the Lehigh Valley are under 50% of the poverty line. Comprehensive Health Services assists over 1,000 people with HIV/AIDS, approximately 40 of whom have an active addiction. Approximately 40% of those infected with HIV/AIDS have a history of addiction.

Victims of Domestic Violence, dating violence, sexual assault and stalking is rapidly increasing both locally and nationally. Turning Point of the LV has been working with victims of domestic violence and sexual assault in the Lehigh Valley Region to provide free and confidential services to victims of domestic

and sexual violence and to the partners of victims. Turning Point of the LV serves approximately 2,600 victims/partners in Lehigh County per year.

What are the housing and supportive service needs of these populations and how are these needs determined?

Elderly Persons frequently age in place in Lehigh County, and require assistance in both housing and supportive services. The existing housing needs accessibility improvements, and the funding for elderly persons to make such improvements is not always readily available. Currently, the Area Agency on Aging has a freeze on accepting new clients, so organizations such as the Center for Vision Loss and Meals on Wheels must make up the gap in services.

Frail Elderly also frequently age in place in Lehigh County. Frail elderly require additional case work from supportive service organizations, and also require affordable housing. Low-income senior housing, which is provided by the Lehigh County Housing Authority, can assist these residents.

Persons with mental, physical and developmental disabilities typically live close to services because public transit is unreliable. Due to the lack of affordable housing, persons with disabilities are pushed further from the services that they need. Persons with mental disabilities need employment. The ARC of the Lehigh Valley works to educate the greater population on the benefit of employing persons with developmental disabilities. Persons with physical disabilities need assistance in accessing public and local organizations or with the completion of paperwork to access these organizations.

Persons with HIV/AIDS and their families receive supportive services from Comprehensive Health Services. Comprehensive Health Services provides medical care for persons with HIV/AIDS. Comprehensive Health Services will partner with organizations that assist with drug and alcohol addictions. All persons with HIV/AIDS will be required to treat HIV/AIDS before beginning the recovery process. Many of the people in this cohort will experience homelessness, but there are no homeless shelters specifically targeted to this population.

Victims of Domestic Violence, dating violence, sexual assault and stalking receive wrap around services from Turning Point of the LV. Turning Point of the LV will assist victims of domestic violence with immediate placement in their shelter or in local hotels when their beds are full. They will also work directly with employers to find jobs for the women they assist. Oftentimes, the lack of daycare makes it difficult for the victims to work on the jobs that Turning Point of the LV can secure. Turning Point also partners with Northampton Community College to provide job training for clients.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

Persons with HIV/AIDS and their families comprise a small percentage of the County's overall population. However, many of those infected with HIV/AIDS are under the poverty rate, where roughly

60% of those seeking help through Comprehensive Health Services of the Lehigh Valley are under 50% of the poverty line. Comprehensive Health Services assists over 1,000 people with HIV/AIDS, approximately 40 of whom have an active addiction. Approximately 40% of those infected with HIV/AIDS have a history of addiction, but recovery centers will not serve this population unless they are actively being treated for HIV/AIDS.

There is a need for additional public transit, opioid counseling, legal representation, and affordable housing for those infected with HIV/AIDS.

Discussion:

The needs for these various groups of the Special Needs Population are only estimates, based on HUD data, U.S. Census Data, ACS data and interviews with housing providers and social service agencies. Accurate statistics are not available for all of these groups, so therefore “best estimates” are presented.

While many supportive service providers for the special needs population are located in the City of Allentown, their service area and clients are in Lehigh County, and sometimes throughout the Lehigh Valley Region. Though many services exist, there are still unmet needs in the Lehigh County area for additional services for these populations.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

- Many of the municipalities in Lehigh County need to make improvements to their parks and recreational facilities.
- The recreation trail in the Borough of Slatington needs to be improved, including benches, additional off-street parking, and event space at the trailhead.
- The swimming pool in Coplay Borough was built in 1971 and is in need of major renovation work. The pool is currently inaccessible and not in compliance with ADA.
- The children's pool in Coplay Borough is in need of major renovation work. A splash pad could potentially replace the pool.
- Coplay Borough would like to install new basketball courts in its recreational facilities.
- The Borough Building in Coopersburg Borough needs to be made accessible. It also has asbestos insulation, which needs to be removed.
- There is a need in Coopersburg Borough to improve the rail trail access and improvements are also needed to other recreation facilities.
- Salisbury Township has a Park Master Plan, and is currently seeking funding to make the needed park improvements.
- The Lehigh Valley Planning Commission has created a Walk-Roll Plan that addresses the need to connect bicycle trails and alternative transit trails to sidewalks.
- The County has many parks that follow streams. There is a need to develop good buffers to prevent flooding.

How were these needs determined?

These public improvements needs were determined through: the resident surveys; meetings with municipal officials; agency needs surveys; interviews with County staff, the County Commissioners, the County's Department of Community and Economic Development staff, the regional Planning Commission, and other County agencies; public hearing comments on needs; and the County's Comprehensive Plan. There are additional public facility needs and improvements that were not provided during the interview process.

Describe the jurisdiction's need for Public Improvements:

- Truck freight traffic has taken a heavy toll on the roads in the area. The emergence of Lehigh County as a shipping and distribution hub has caused increased damage to infrastructure that was not built to meet current demands and weight limits.
- There is a need for ADA accessibility improvements across the County for the public facilities.

- Stormwater runoff is a major problem in Lehigh County. The City of Allentown taxes stormwater runoff, but the smaller municipalities within the County cannot do this.
- Many of the municipalities in Lehigh County have a mandate to improve stormwater mitigation but lack the funding to do so.
- There are many public improvements projects that could be implemented more effectively through partnerships between municipalities in the County.
- The Borough of Slatington has a misaligned intersection that causes traffic problems and potentially can cause accidents. The Borough needs to realign the street.
- Stormwater in Slatington Borough will flow down the hills on the outskirts and create pools of water in the center of the Borough. There is a need to improve storm drainage to prevent flooding as a result of storms.
- Coplay Borough is currently replacing its storm inlets when it repairs its streets. The Borough still needs to repair additional inlets which would mitigate flooding issues.
- The Borough of Fountain Hill also has a need to mitigate stormwater pooling.
- The Borough of Coopersburg needs to improve its traffic signalization and pedestrian crossings.
- The Borough of Alburtis needs to separate its storm and sanitary sewers.

How were these needs determined?

These public improvements needs were determined through: the resident surveys; meetings with municipal officials; agency needs surveys; interviews with County staff, the County Commissioners, the County's Department of Community and Economic Development staff, the regional Planning Commission, and other County agencies, public hearing comments on needs, and the County's Comprehensive Plan.

Describe the jurisdiction's need for Public Services:

- There is a need throughout the County for improved service via public transit. Many of the public services in the County are difficult to access without a car and public transit is the best alternate solution.
- Many working families in Lehigh County require affordable childcare so they can earn a living.
- There is a need for adult education programs. Many adults lack the necessary skills for employment. While there are GED programs in the area, they do not reach the total unemployed or underemployed population.
- Meals on Wheels serves homebound disabled and elderly persons in Lehigh County. They have continued to serve more and more clients, but require a new kitchen.
- The Area Agency on Aging has currently put a freeze on new clients intakes. There is a need to assist senior citizens in the County with casework and "aging in place" programs.

- There are no counseling programs for opioid addictions in the County, yet it is a serious problem in the County.
- There are many adults who are illiterate in English, often because they are recent arrivals from Spanish-speaking countries in Central and South America and the Caribbean.
- There is a need for English as a Second Language programs in the County. It is likely that there are far more persons that only speak Spanish in Lehigh County than currently estimated, especially given the number of Puerto Ricans moving to the area in the aftermath of Hurricane Maria in 2017.
- Many of the poorer residents of Lehigh County lack the financial resources to purchase new shoes and clothing.
- The number of students with special academic and educational needs in the County continues to grow. There is a need for more services to assist these students.
- Adult education programs are also lacking for persons with special needs.
- There are no universal pre-K programs in Lehigh County.
- There is a need throughout communities in Lehigh County to educate people on the benefits of employing persons with special needs.
- Smaller nonprofits struggle to build capacity to provide more services throughout the County.

How were these needs determined?

These public service needs were determined through: the resident surveys; meetings with municipal officials; agency needs surveys; interviews with County staff, the County Commissioners, the County's Department of Community and Economic Development staff, the regional Planning Commission, and other County agencies; public hearing comments on needs; and the County's Comprehensive Plan.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

Lehigh County is an urban county in Eastern Pennsylvania with areas ranging from urban to rural. The City of Allentown is the County Seat of Lehigh County and it is the third largest City in the State of Pennsylvania. A portion of the City of Bethlehem also lies in Lehigh County, and suburban boroughs and townships located outside of the two cities are located within the County. Lehigh County and Northampton County are the core counties of the Lehigh Valley Region, which is the third largest metropolitan area in the Commonwealth of Pennsylvania. It is located approximately 100 miles west of New York City and approximately 60 miles north of Philadelphia, and is an attractive exurban community to people who work in either of those larger metropolitan areas. Lehigh County's economy was originally based on manufacturing. The County and region have many assets, including educational institutions and dense downtowns in the Cities of Allentown, Bethlehem, and Easton (located in Northampton County). Due to the area's connections to New York and Philadelphia, the region has become attractive to shipping companies and the number of shipping jobs in the area has grown substantially. Migrants from Latin America, mostly from Puerto Rico and the Dominican Republic, have also moved to Lehigh County over the last 20 years. This has led to Lehigh County becoming one of the fastest growing counties in the nation. Its population was 312,090 in 2000, and was 365,371 in 2017 according to the 2013-2017 American Community Survey estimates, which was a 17% growth rate over 17 years.

Approximately two-fifths (40.6%) of all the owner-occupied housing units were built before 1960, which is close to 60 years ago. About one-fifth (21.8%) of the housing was built between 1960-1979, and another fifth (22.4%) was built between 1980-1999. In the last twenty years, about 15.1% of the housing stock was built.

According to 2013-2017 American Community Survey Data, the County now has 89,550 owner-occupied housing units, with 71,355 of those housing units located outside the City of Allentown. There were 47,689 renter-occupied housing units, with 23,949 located outside the City of Allentown. In the county (outside the City of Allentown), 25.1% of housing is occupied by renters, and 74.9% of housing is owner-occupied.

The condition of the housing stock is adequate, but a small percentage of the housing stock is either neglected or not adequately maintained. According to the ACS data for 2013-2017, there are 7,857 vacant housing units in the County, 3,855 of which are in the City of Allentown. This means that Lehigh County has a vacancy rate of 5.4%, and 4.0% when the City of Allentown is excluded.

The median home value as of 2017 was \$201,600 and the median contract rent was \$841/month for the same time period.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

According to the 2011-2015 ACS data, there are 86,943 total housing units. There are 82,854 occupied housing units (64,396 owner-occupied and 18,458 renter-occupied), which leaves 4,089 vacant housing units. The majority of the owner-occupied housing are 3 or more bedrooms (86% of all owner-occupied houses). Approximately 36% of all renter-occupied households have 2 bedrooms.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	54,485	63%
1-unit, attached structure	16,145	19%
2-4 units	3,959	5%
5-19 units	6,147	7%
20 or more units	3,190	4%
Mobile Home, boat, RV, van, etc	3,017	3%
Total	86,943	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	50	0%	689	4%
1 bedroom	719	1%	5,459	30%
2 bedrooms	8,120	13%	6,700	36%
3 or more bedrooms	55,507	86%	5,610	30%
Total	64,396	100%	18,458	100%

Table 28 – Unit Size by Tenure

Data Source: 2013-2017 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The following number of units in Lehigh County that are assisted with Federal, State and Local Programs is as follows:

- **Public Housing** - There are 289 public housing units located in Lehigh County. The public housing developments are: 7th Street Village – 25 family units; George Dilliard Manor – 75 elderly units;

Coplay Family – 25 units; Ridge Manor – 75 elderly units; Clarence Aungst Towers – 75 elderly units; Fountain Hill – 75 Senior units and 14 family units. These public housing communities are all located outside the City of Allentown.

- **Low Income Housing Tax Credit (LIHTC)** – According to HUD’s Low-Income Housing Tax Credit Database, there are a total of 1,844 Low Income Housing Tax Credit units in Lehigh County, of which 1,491 are considered low-income units.
- **Housing Choice Vouchers** – The Housing Authority administers 1,652 vouchers that are tenant based.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Lehigh County Housing Authority does not expect to lose any affordable housing inventory during the FY 2019-2023 Five Year Consolidated Plan period.

Does the availability of housing units meet the needs of the population?

There is not a sufficient supply of rental housing units by various types within Lehigh County. There are 18,458 renter-occupied housing units with a 7.0% vacancy rate. When looking at homeownership supply, the market is extremely tight at 1.2% vacancy. There are approximately 1,034 units for rent. The problem is not only the “availability” of units in Lehigh County, but mainly the “affordability” and the “quality” of the units in the County. The need for affordable housing for singles is evidenced by the Housing Authority’s public housing waiting lists.

The majority of applicants on the public housing waiting list (67%) are waiting for a 1 bedroom unit. There are 1,877 persons on the public housing waiting list that are waiting for an efficiency or one bedroom apartment, 41% that identify themselves as elderly, and/or 56% with a disability.

The Section 8 Housing Choice Voucher waiting list includes applicants who are 88% extremely low income and 12% very low income. These applicants include 60% who are families with children, 14% are elderly, and 38% are families with disabilities. In addition to housing for those with extremely low incomes, the biggest needs for applicants on the Section 8 waiting list are for units for families with children, and for those with a disability. The Housing Authority’s Five Year Plan did not indicate the bedroom sizes requested for people on the waiting list for Section 8 Vouchers.

Describe the need for specific types of housing:

The greatest needs for residents of Lehigh County is housing for those that are extremely low income (0-30% AMI). Families with incomes at 0-30% of the median income are the population most represented on the Lehigh County Housing Authority waiting list.

The Valley Housing Development Corporation is currently working to meet the needs of residents of Lehigh County through its expansion. VHDC began in 1983 to take advantage of Low Income Housing Tax

Credits (LIHTC). In the past five (5) years, VHDC has created approximately 500 affordable housing units, either through construction or arranging funding to make the units profitable. VHDC also works to preserve affordable housing that already exists within the County.

Discussion

More than two-thirds of the housing in Lehigh County is homeownership housing. There is a need for a wider variety of housing types in Lehigh County, particularly with the lack of affordable housing in the area. Additional affordable rental housing is needed for residents of Lehigh County. There is a need for homeownership initiatives and rehabilitation to utilize existing housing units for homeowners.

DRAFT #3

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

The cost of housing has decreased from \$195,700 to \$191,700 in the last 11 years for a single-family home. Research on Zillow.com shows that the average list price for a home in the Lehigh County area in the Spring of 2019 was \$239,500, which is 23.5% higher than the average sold price in the county (\$182,700).

The cost of rent has increased by 16% during the period from 2000 to 2015, and the rental vacancy rate is 7.0% [MSA for 4th quarter 2018], which is close to the homeowner vacancy rate of 1.2%. These numbers seem to show demand focused on both rental housing and homeownership.

Because Lehigh County was not a Federal entitlement in the base year of 2000, its Census numbers include the other entitlement communities within the County: the City of Allentown and a portion of the City of Bethlehem, while the 2015 population only includes the Lehigh County entitlement community. For this reason, Lehigh County incorrectly appears to have lost home value below. Based on consultations and non-census related data it can be concluded that the County needs to continue its efforts to maintain affordable rental options for the elderly and disabled.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2015	% Change
Median Home Value	\$195,700	\$191,700	-2%
Median Contract Rent	\$685	\$792	16%

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	3,081	16.7%
\$500-999	9,608	52.0%
\$1,000-1,499	4,617	25.0%
\$1,500-1,999	855	4.6%
\$2,000 or more	259	1.4%
Total	18,420	99.8%

Table 30 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	1,023	No Data

% Units affordable to Households earning	Renter	Owner
50% HAMFI	2,509	2,273
80% HAMFI	8513	10,000
100% HAMFI	No Data	18,086
Total	12,045	30,359

Table 31 – Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	668	824	1,048	1,352	1,427
High HOME Rent	668	824	1,048	1,227	1,350
Low HOME Rent	653	700	840	970	1,082

Table 32 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

Based on the HUD - CHAS data in the chart above, approximately 57% of housing is affordable for low-income families and individuals with incomes at or below 80% of Area Median Income. Additionally, 13% of renters and homeowners live in housing that is affordable for those at 50% or below of Area Median Income. However, when looking at different CHAS data, there is not sufficient housing for all income levels due to the cost over burden criteria for the following groups:

The following households have housing costs that are 0% to 30% of their AMI:

- White households = 53,254 or 64.3% of households
- Black/African American households = 850 or 1.0% of households
- Asian households = 2,283 or 2.7% of households
- Hispanic households = 2,497 or 3.0% of households

The following households have housing costs that are greater than 50% of their AMI:

- White households = 7,640 or 9.2% of households
- Black/African American households = 370 or 0.4% of households
- Asian households = 365 or 0.4% of households
- Hispanic households = 700 or 0.8% of households

When examining the percentage of each racial or ethnic group that have a housing problem, severe housing problem, or are housing cost overburdened, compared to that of the racial or ethnic group overall, a different picture presents itself. According to the 2011-2015 CHAS data, 72.5% of all White households, 52.3% of Black/African American households, 78.1% of Asian households, and 62.6% of Hispanic households are cost-overburdened by over 30%, while 10.4% of White households, 22.8% of Black households, 12.5% of Asian households, and 17.5% of Hispanic households were cost overburdened by over 50%. When examining housing problems for households at median income or less, 52.1% of White households, 82.8% of Black/African American households, 44.8% of Asian households, and 63.4% of Hispanic households have a housing problem. When comparing these numbers to the cost overburdened numbers, it seems as though cost overburdens are affecting White households, while housing problems are affecting Black households. The numbers are often higher for severe housing problems with 25.3% of White households, 59.1% of Black/African American households, 36.3% of Asian households, and 33.8% of Hispanic households experiencing severe housing problems. Overall, these numbers show that many residents of Lehigh County have a severe housing problem; African American/Black households in Lehigh County are much more likely to experience a housing problem or a severe housing problem than any other group.

How is affordability of housing likely to change considering changes to home values and/or rents?

Median Home Value has dropped over the past two decades by 2%; however, housing affordability is still currently a chief concern for Lehigh County. Lehigh County has experienced a significant (16%) increase in the price of rental housing. Though the rental housing market only encompasses 21% of the overall housing market, it still will likely affect the affordability of housing for low income households. Also, the median income in Lehigh County has increased at a slower rate than the increase in the price of rental housing. This could cause additional housing affordability issues.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

According to RentOMeter (www.Rentometer.com), it is estimated that the Area Median Rent is for a one bedroom apartment is \$718 per month, for a two bedroom apartment is \$885 per month, for a three bedroom apartment \$1,150 per month, and for a four bedroom apartment \$1,193 per month. These estimates are less than the HOME rents and Fair Market rents for one, two, and three bedroom apartments in Lehigh County but higher than the Low HOME rent for one, two, three, and four bedroom apartments. Although market rents appear to be slightly lower than the HOME and Fair Market rents for Allentown, housing affordability is still the biggest housing problem for low-income families and individuals according to the CHAS data, indicating a need for housing subsidies and assistance.

Discussion

The housing market is a problem in Lehigh County. Affordability and housing quality are becoming an increasing problem for the lower income residents. There is a shortage of housing in the county and, with the influx of new residents, the housing market is getting worse. The supply of housing is not keeping pace with demand.

DRAFT #3

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Lehigh County contains 16,522 housing units that were constructed prior to 1950, which is 19.9% of all the housing units in the County. Approximately, 10,338 housing units are occupied by families with children and may contain a risk of lead-based paint within the unit. Of all the 86,943 total housing units, 82,879 are occupied. It is estimated that over 28% of the housing units are in need of housing rehabilitation work, from minor work to major rehabilitation work.

Definitions

The following definitions are used in the table below:

“Selected Housing Conditions:”

- Over-crowding (1.01 or more persons per room)
- Lacking a complete kitchen
- Lack of plumbing facilities and/or other utilities
- Cost overburden

“**Substandard Condition:**” Does not meet code standards, or contains one of the selected housing conditions.

“**Suitable for Rehabilitation:**” The amount of work required to bring the unit up to minimum code standards and the existing debt on the property together are less than the fair market value of the property.

“**Not Suitable for Rehabilitation:**” The amount of work required to bring the unit up to minimum code standard exceeds the fair market value of the property after rehabilitation work is complete.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	15,520	24%	7,183	39%
With two selected Conditions	228	0%	690	4%
With three selected Conditions	4	0%	45	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	48,660	76%	10,549	57%
Total	64,412	100%	18,467	100%

Table 33 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	12,083	19%	2,382	13%
1980-1999	17,779	28%	3,934	21%
1950-1979	22,619	35%	7,556	41%
Before 1950	11,917	18%	4,605	25%
Total	64,398	100%	18,477	100%

Table 34 – Year Unit Built

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	34,536	54%	12,161	66%
Housing Units built before 1980 with children present	5,705	9%	4,633	25%

Table 35 – Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	3,042	960	4,002
Abandoned Vacant Units	235	74	309
REO Properties	70	21	91
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Data Source: ACS Five Year Estimates and RealtyTrac.com

Need for Owner and Rental Rehabilitation

Based on consultation with Lehigh County's housing providers, homes and structures that are in need of rehabilitation tend to be in the older, built-up areas of the County. These areas often include the Boroughs and incorporated areas that are adjacent to the Cities of Allentown or Bethlehem, as opposed to the townships, where most of the housing stock is newer.

The older housing stock in areas such as the Borough of Slatington or the Borough of Catasauqua is often in poorer shape than the newer housing stock in the townships. There is a great need for owner

and rental housing rehabilitation in these areas. Many workers in the area require affordable housing and improvements to their current homes. Housing is usually not located near employment centers, and workers in the warehouse distribution centers with lower incomes often cannot afford to repair their homes. There is a need for owner and rental housing rehabilitation work for this subset of County residents.

Much of the high-end housing development is taking place in the City of Allentown. Because the prices in Allentown are rising, especially in the Downtown, residents of Allentown that are being priced out of the area move to the outskirts of the City of Allentown, where the housing stock is in poorer condition. Furthermore, the City of Allentown has only recently reinstated their housing rehab program in 2019 after many years of being on hold. This creates a greater demand for housing in Lehigh County, where homeowners and renters have access to newer housing stock and housing rehabilitation programs. Funding is available for county housing rehabilitation projects through multiple sources and programs, including Affordable Housing Trust Funds. The Lehigh Valley Community Land Trust also purchases housing within the County to assist in providing affordable housing.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

According to the 2011-2015 CHAS data, 12,161 renters live in housing constructed before 1980 and are at risk of lead-based paint, and 34,536 homeowners live in similar housing and face similar risks.

There is a need for a housing advocacy program for tenants to make them aware of their rights for decent, safe, sanitary, and accessible housing. The County includes lead disclosures in its applications for housing rehab programs, and ensures that any Federal or State lead-based paint regulations will be followed by contractors that work on housing rehabilitation programs.

Discussion

The County needs to continue to spend funds to rehabilitate homes and to construct new housing to increase the housing supply in the high-demand areas of the County. The County also needs to continue to preserve its existing housing to lead to revitalization in areas of the County that are lower income. The need for affordable rental housing is the largest unmet need in Lehigh County.

Emergency Management:

Lehigh County consulted with the County Emergency Manager to determine the emergency management needs of the County. Flooding is the primary emergency in Lehigh County, followed by fires, hurricanes, and other natural disasters. Renters in Lehigh County tend to lose the most property in any flood or other emergency because they do not have insurance. There is additional need for storm sewer separation in the County to mitigate flooding, and there is a need to backfill areas along stone roads in more rural areas of the County. Each jurisdiction in the region creates its own mitigation strategy that is complemented by the emergency management plan should such an emergency occur.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The Lehigh County Housing Authority (LCHA) is a high performing housing authority that owns and professionally manages family communities and elderly/disabled rental apartments. The apartments are located throughout Lehigh County. LCHA has a total of 289 public housing units, with 15 fully accessible units and 11 semi-accessible units. Additionally, LCHA has 433 non-Federally assisted units. The Housing Authority manages Section 8 Housing Choice Vouchers. The Housing Authority administers 1,652 baseline vouchers, with 1,100 under contract as of March, 2019.

There are a total of 289 public housing units in Lehigh County. According to the Five Year and Annual Plan for 2019-2023, LCHA's progress in meeting their mission and goals states that LCHA achieved high performer status. Lehigh County Housing Authority received inspection scores over 90 in 2013, 2014, 2015, and 2016 and was considered a "high performer."

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	16	289	1,652	26	1,626	0	849	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

- 7th Street Village – 25 family units
- George Dilliard Manor – 75 elderly units
- Coplay Family – 25 units
- Ridge Manor – 75 elderly units
- Clarence Aungst Towers – 75 elderly units
- Fountain Hill – 75 Senior units and 14 family units

LCHA also owns and manages Section 8 Housing for families at Catasauqua Family Apartments and elderly and disabled apartments at Franklin Balliet Apartments at Macungie Meadows. Catasauqua Family Apartments consists of ten (10) units.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The 289 public housing units are in good condition. Through its Capital Program, repaired rehabilitation work takes place on a regular basis.

Public Housing Condition

Public Housing Development	Average Inspection Score
Lehigh County Housing Authority	91

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The Lehigh County Housing Authority recently submitted its Five Year Plan Update for its FY 2019 through FY 2023 Public Housing Capital Fund Program Grant. The Capital Fund Grant award for FY 2019 was \$506,299. The LCHA proposed various activities to improve the overall living environment in the Authority's public housing communities. The activities are as follows:

2019 Fund:

- Replacement of windows at Clarence Aungst Towers
- Rehabilitation of kitchens at Cherokee and Delaware Apartments
- Replacement of siding, sheeting, and windows at 17th Street Village

2020 Fund:

- Parking lot site improvements at Ridge Manor
- Rehabilitation of kitchens at Cherokee and Delaware Apartments
- Replacement of siding, sheeting and windows at 17th Street Village
- Increase the size of the parking lot at George Dilliard Manor

2021 Fund:

- Increase the size of the parking lot at George Dilliard Manor
- Replace apartment light fixtures at George Dilliard Manor
- Replace doors and frames at 17th Street Village
- Rehabilitate bathrooms at Cherokee and Delaware Apartments

2022 Fund:

- Rehabilitate kitchens at Cherokee and Delaware Apartments
- Rehabilitate kitchens at Ridge Manor

2023 Fund:

- Rehabilitate kitchens at Ridge manor

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The Lehigh County Housing Authority currently does not have active resident councils at any of its communities. Though attempts have been made to create resident councils, they have all dissolved.

Section 8 Voucher Holders have the opportunity to set and reach goals that they set for themselves and their families, as well as saving a significant amount of money. Section 8 Voucher Holders may also use their vouchers to realize the “American Dream” of becoming a homeowner. Both of these opportunities are available to Section 8 Voucher Holders who choose to become participants in Section 8’s Family Self-Sufficiency Program. There are two parts to the program. The first part of the program is the Self-Sufficiency program where participants have the opportunity to work on meeting goals that they set for their families as well as save money that will become theirs when they have completed their goals. The second part of the program is the Homeownership Program. In this part of the program, a Section 8 participant can choose to use his or her Section 8 voucher for the purchase and mortgage payments of a home. Each part of the Self-Sufficiency program is detailed below.

Family Self-Sufficiency (FSS) is a voluntary HUD program that encourages and assists families to become self-sufficient. Anyone currently on the Section 8 Housing Choice Voucher Program is eligible for this program. FSS offers a financial incentive to families through an escrow account, which is based on an increase in a family’s earned income. An example of an increase in earned income would be when a family member has a pay raise, obtains employment or has an increase in his or her working hours that results in an increase in the portion of rent that the family pays each month. For example, if a family member begins working 40 hours per week, and the family’s rent increase \$25.00 dollars per month, that \$25.00 dollars goes into an escrow account that the Housing Authority establishes for the family. This account becomes available to the family when the family successfully completes their FSS Contract of Participation. Depending upon each participant’s situation, the FSS Program can connect tenants with job training, resource planning, credit repair resources, basic skills education, high school equivalency (GED) programs, post-secondary education, and assistance with securing meaningful employment. Advisors provide emotional support, case management, and personalized assistance.

The Housing Authority does not support any other homeownership initiatives.

Discussion:

Lehigh County Housing Authority is the primary provider of housing for the very low- and extremely low-income residents of Lehigh County. The Lehigh County Housing Authority assists individuals and families through its Public Housing communities, Low Income Housing Tax Credit communities, and Section 8 Housing Choice Vouchers program.

DRAFT #3

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The Lehigh Valley Regional Homeless Advisory Board (RHAB) implements the CoC's policies to address homelessness in Lehigh County. It is comprised of various stakeholders from Lehigh and Northampton Counties, including City of Allentown, City of Bethlehem, and County Departments, social service agencies, veterans support groups, faith-based organizations, homeless advocates, and other interested parties. In Lehigh County, Valley Youth House, Turning Point of the Lehigh Valley, Lehigh Valley Conference of Churches, YMCA of Lehigh County, Salvation Army, Catholic Charities, and County service groups provide housing and supportive services for the County's homeless and at risk of being homeless population. The Lehigh Valley RHAB's mission is: "Covering all communities in Lehigh and Northampton Counties, the Lehigh Valley RHAB is a consortium of individuals, agencies and other stakeholders that direct and coordinate community-wide efforts toward ending chronic homelessness." The Lehigh Valley RHAB absorbed the City of Allentown's Homelessness Commission in 2015 to better plan services for the homeless from a regional perspective.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	187	0	30	110	0
Households with Only Adults	75	64	36	136	0
Chronically Homeless Households	n/a	n/a	n/a	0	n/a
Veterans	n/a	n/a	n/a	2	n/a
Unaccompanied Youth	n/a	n/a	6	n/a	n/a

Table 39 - Facilities and Housing Targeted to Homeless Households

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Enrollment in mainstream services and other subsidized housing resources are available through COMPASS, the state's web-based system for accessing resources. The CoC distributes the updated list of Housing and Homeless Liaisons in every PA County Assistance Office to all agency caseworkers in the Region in order to facilitate linkages and eliminate barriers to accessing mainstream resources. Case workers use COMPASS to access Medicaid, Children's Health Insurance Program, mental health and substance abuse care, Child Care Works Program, Food Stamps, TANF-funded services, Energy Assistance, School Meals, Home and Community Based Services, Long Term Care, and Select Plan for Women. They also work with PA's Health Insurance Marketplace providers to access health insurance under the Affordable Care Act and coordinate with the VA Medical Centers to improve access to VA medical services.

The CoC provides up-to-date information to program staff at the County level during homeless coalition meetings. The Executive Housing Director of the Pennsylvania Department of Human Services is also a member of the Governing Board of the CoC and provides relevant updates. The CoC undertakes this strategy to increase collaboration between local service provider coalition members.

Local providers help clientele access mainstream health and mental health services and job training and education. Many homeless populations, particularly young adult homeless populations, are difficult to reach with mainstream services. In response, Lehigh Valley Health Network's Comprehensive Health Services brings health care services to the locations of the homeless. Organizations such as Workforce LV provide services that could be utilized by homeless populations for employment training.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The Eastern PA CoC does not directly receive ESG funds. ESG funds for the Lehigh Valley RHAB are administered through the Pennsylvania Department of Community and Economic Development (DCED) in a partnership with the City of Allentown, which also receives ESG funds as a direct HUD ESG entitlement. DCED has developed a process for allocating funds, evaluating outcomes, and developing policies and procedures. The CoC consults with DCED regarding past program performance and involvement of ESG applicants. To supplement the ESG funds received by the City of Allentown, Lehigh County DCED completes an application for the PA Department of Community and Economic Development to obtain more ESG funds for community homeless service providers. It is to be determined if this application will be approved.

The Lehigh County Conference of Churches is currently the largest provider of homeless services in Lehigh County. Previously, the Conference of Churches ran the winter weather emergency shelter during the coldest weeks of the year, but this role has shifted to the YMCA for homeless males and to the Salvation Army for homeless females. The Conference of Churches partners with Catholic Charities to provide food at meal services, though both organizations would like to accomplish more in that area. The Conference of Churches provides emergency shelters for needy families, and has also used motels to assist with Rapid Rehousing. The Conference of Churches has created a smaller program to assist those released from prison to find housing.

Valley Youth House is another major provider of services for the homeless, though their programs focus on the youth of the area. Valley Youth House will assist individuals that may have been in foster care. Valley Youth House receives funding for both Transitional Housing and Rapid Rehousing projects. Youth homelessness is a major problem in the Lehigh Valley Area, particularly for individuals in the 18-24 age group. It is estimated that up to 20% of the homeless people in the area fall into this age group. There is a need for a year-round shelter for this age group, as Valley Youth House does not serve children over the age of 18. Focused outreach has been conducted by the CoC on this age group in partnership with Valley Youth House, and this population continues to be a priority for Lehigh County.

Turning Point LV will provide housing to victims of domestic violence and their families. They provide 32 transitional housing beds for survivors fleeing immediate abuse and will partner with other agencies to find permanent housing for victims, including Third Street Alliance, which is the major Rapid Rehousing provider for this population.

Previously, Lehigh County had a robust program to assist veterans experiencing homelessness that received SSVF funding. Because of the success of the program and the resulting lower numbers of veteran homelessness, the program's funding was cut.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

Lehigh County has identified the priorities for services and facilities for its special needs population. This includes the elderly, frail elderly, persons with disabilities, persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, and public housing residents.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

The following needs and objectives are established under this Five Year Consolidated Plan:

- **Elderly** - rehabilitation of existing owner-occupied housing units and construction of new affordable and accessible apartments
- **Frail Elderly** - construction of new affordable and accessible apartments with supportive services; removal of architectural barriers in their homes
- **Persons with Disabilities** - rehabilitation of existing housing units for accessibility improvements, reasonable accommodations to rental housing units, destruction of supportive housing units, and supportive employment opportunities
- **Alcohol and Other Drug Addictions** - supportive services to end addictions and training to re-enter the work force
- **Public Housing Residents** - Down payment homebuyer assistance, job training and job opportunities, housing counseling for home ownership, and assistance in finding affordable housing
- **Victims of Domestic Violence** – Need for additional temporary shelters, supportive services and training programs, and permanent supportive housing options

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Hospitals and state institutional facilities must have written discharge policies for "appropriate referral and transfer plans" including evaluation of a patient's capacity for self-care and possibility of being cared for in "the environment from which s/he entered the hospital." The actual discharge varies with the individual being discharged, their primary and behavioral health needs, and resources and supports

available. While institutions try to send individuals home or to family, sometimes they discharge to a nursing home, rehab hospital or as last resort, non-HUD funded shelter. Some shelters have protocols against accepting certain individuals directly from a hospital. Plans are coordinated with foster care, health care, mental health care, and correctional facilities. The CoC conducts additional discharge planning for youth exiting systems of care to adhere to its strategy of preventing youth homelessness.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Lehigh County proposes as its "Vision" of the Five Year Consolidated Plan the following under "Other Special Needs Strategy":

Goal: Improve, preserve, and expand facilities for persons with special needs and the disabled in Lehigh County.

Objectives:

- **SNS-1 Housing** - Promote and assist to increase the supply of affordable, decent, safe, sound, and accessible housing for the elderly, persons with disabilities, and persons with other special needs, through rehabilitation of existing housing and new construction of accessible housing.
- **SNS-2 Social Services** - Promote and assist in supporting social service programs and facilities for the elderly, persons with disabilities, and persons with other special needs.
- **SNS-3 Accessibility** - Promote and assist in making accessibility improvements to owner-occupied housing through rehabilitation and improve renter-occupied housing by making reasonable accommodations for the physically disabled.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

Not Applicable.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Lehigh County's 2018 Analysis of Impediments to Fair Housing Choice has identified the following impediments, along with goals and strategies to address those impediments and affirmatively further fair housing in the County:

Impediment 1: Lack of Affordable Housing - There is a lack of affordable housing in Lehigh County due to the influx in the number of unskilled and semi-skilled workers who have moved into the County, which has created a high demand and a corresponding increase in the cost of rental and sales housing.

Goal: Increase the supply of affordable housing by new construction and rehabilitation of various types of housing that is affordable to lower income households.

Strategies: In order to address the need and achieve the goal for more affordable housing, the following activities and strategies should be undertaken:

- **1-A:** Continue to promote the need for affordable housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is affordable.
- **1-B:** Encourage and promote the development, construction, and/or rehabilitation of mixed-income housing in areas of the County which do not have a concentration of low-income households.
- **1-C:** Encourage and promote the development, construction, and/or rehabilitation of affordable housing in mixed-use properties with retail/office space on the lower levels and residences above.
- **1-D:** Support financially, the rehabilitation of existing housing owned by seniors and lower-income households to conserve the existing affordable housing stock in the County.
- **1-E:** Provide financial and development incentive to private developers and non-profits to construct and/or rehabilitate affordable housing.
- **1-F:** Continue to work with the Lehigh Valley Planning Commission Housing Study Group to promote the development, construction, and rehabilitation of affordable housing.

Impediment 2: Lack of Accessible Housing - There is a lack of accessible housing in Lehigh County since the supply of accessible housing has not kept pace with the demand caused by the increase in the percentage of elderly persons in Lehigh County and more disabled persons desiring to live independently.

Goal: Increase the supply of accessible housing by new construction and rehabilitation of accessible housing for persons who are disabled.

Strategies: In order to address the need and achieve the goal for more accessible housing, the following activities and strategies should be undertaken:

- **2-A:** Continue to promote the need for accessible housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is accessible to persons who are disabled.
- **2-B:** Support financially, improvements to single-family owner-occupied homes to make them accessible for the elderly and/or disabled so they can continue to live in their homes.
- **2-C:** Encourage and promote the development of accessible housing units in multi-family buildings as a percentage of the total number of housing units.
- **2-D:** Encourage and financially support landlords to make accommodations to units in their building so persons who are disabled can reside in their apartments.
- **2-E:** Enforce the Americans with Disabilities Act (ADA) and the Fair Housing Act (FHA) in regard to making new multi-family housing developments accessible and visitable for persons who are physically disabled.

Impediment 3: Barriers Limiting Housing Choice - There are physical, economic, and social barriers in Lehigh County which limit housing choices and housing opportunities for low-income households, minorities, and the disabled members of the County's population.

Goal: Eliminate physical, economic, and social barriers in Lehigh County and increase housing choices and opportunities for low-income households and members of the protected classes throughout Lehigh County.

Strategies: In order to achieve the goal for more housing choice, the following activities and strategies should be undertaken:

- **3-A:** Deconcentrate pockets of racial and ethnic poverty by providing affordable housing choices for persons and families to move outside of these areas.
- **3-B:** Support and promote the development of affordable housing in areas of opportunity where low-income persons and families may move.
- **3-C:** Support and promote the planning and model zoning efforts of the Lehigh Valley Planning Commission to eliminate "exclusionary zoning" and land development ordinances which restrict the development of affordable housing.
- **3-D:** Eliminate architectural barriers in public accommodations, public facilities, and multi-family new housing developments.
- **3-E:** Encourage LANta (the public transportation system) to develop additional routes to provide better access to job opportunities for low-income households.

Impediment 4: Lack of Housing Awareness - There is a lack of knowledge and understanding concerning the rights of individuals, families, and members of the protected classes in regard to the Fair Housing Act (FHA) and awareness of discriminatory practices.

Goal: Improve knowledge and awareness of the Fair Housing Act (FHA), related housing and discriminatory laws, and regulations, so that the residents in Lehigh County can Affirmatively Further Fair Housing (AFFH).

Strategies: In order to address the need and achieve the goal of promoting open and fair housing, the following activities and strategies should be undertaken:

- **4-A:** Continue to educate and make residents aware of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **4-B:** Continue to educate and make realtors, bankers, and landlords aware of discriminatory housing policies and to promote fair housing opportunities for all County residents.
- **4-C:** Sponsor and participate in a “Regional Housing Summit” to discuss housing needs and approaches to achieve more affordable housing in the County.
- **4-D:** Continue to financially support the Fair Housing organizations and legal advocacy groups to assist persons who may be victims of housing discrimination and/or not aware of how to file a housing complaint.
- **4-E:** Continue to monitor the data from the Home Mortgage Disclosure Act (HMDA) to ensure that discriminatory practices in home mortgage lending not take place.

Impediment 5: Lack of Economic Opportunities - There is a lack of economic opportunities in the County for lower-income households to increase their income and thus improve their choices of housing.

Goal: Improve the job opportunities in the County, which will increase household income and make it financially feasible to live outside concentrated areas of poverty.

Strategies: In order to address the need and achieve the goal for better economic opportunities, the following activities and strategies should be undertaken:

- **5-A:** Encourage and strengthen partnerships between public and private entities to promote economic development, improve the local tax base, and create a sustainable economy.
- **5-B:** Promote and encourage the expansion of existing commercial and light industrial enterprises, which will create more employment opportunities.
- **5-C:** Provide financial and development assistance to enterprises, which will create new job opportunities and higher wages for County residents.
- **5-D:** Identify development sites for potential private investment and/or expansion of existing enterprises.
- **5-E:** Continue to improve the infrastructure to underdeveloped areas of the County to promote new development and create new job opportunities.
- **5-F:** Continue to partner with Lehigh Career & Technical Institute to develop training programs for unemployed and underemployed persons in the County.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

The goal of Lehigh County's Department of Community and Economic Development is to help to plan and design the County's form and character, support community values, preserve the environment, promote the wise use of resources and protect public health and safety through code enforcement. The Department of Community and Economic Development is the administrator of the Community Development Block Grant. The office also provides outreach and technical assistance for a variety of downtown and County-wide community and economic development projects.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	420	452	0	0	0
Arts, Entertainment, Accommodations	8,732	10,808	9	9	0
Construction	4,195	4,161	5	3	-1
Education and Health Care Services	20,678	27,295	22	23	1
Finance, Insurance, and Real Estate	5,320	5,068	6	4	-1
Information	1,855	1,789	2	2	-1
Manufacturing	11,167	12,929	12	11	-1
Other Services	3,093	2,935	3	2	-1
Professional, Scientific, Management Services	9,645	10,726	10	9	-1
Public Administration	0	0	0	0	0
Retail Trade	10,885	14,604	12	12	1
Transportation and Warehousing	5,051	10,967	5	9	4
Wholesale Trade	4,799	7,028	5	6	1
Total	85,840	108,762	--	--	--

Table 40 - Business Activity

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	116,091
Civilian Employed Population 16 years and over	109,160
Unemployment Rate	5.95
Unemployment Rate for Ages 16-24	18.31
Unemployment Rate for Ages 25-65	4.03

Table 41 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	27,979
Farming, fisheries and forestry occupations	4,188
Service	9,261
Sales and office	27,450
Construction, extraction, maintenance and repair	7,709
Production, transportation and material moving	6,226

Table 42 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	70,475	69%
30-59 Minutes	23,652	23%
60 or More Minutes	8,545	8%
Total	102,672	100%

Table 43 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	2,966	451	1,986
High school graduate (includes equivalency)	24,800	1,363	6,499
Some college or Associate's degree	26,050	1,308	4,478

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	37,759	1,554	5,669

Table 44 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	152	157	317	946	2,526
9th to 12th grade, no diploma	1,362	650	719	2,658	4,012
High school graduate, GED, or alternative	5,418	5,257	6,630	20,775	15,620
Some college, no degree	5,658	4,309	4,405	10,659	4,865
Associate's degree	1,077	2,434	3,271	6,768	1,799
Bachelor's degree	2,075	7,600	6,918	12,585	4,343
Graduate or professional degree	58	3,479	4,482	9,959	3,620

Table 45 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	22,604
High school graduate (includes equivalency)	30,943
Some college or Associate's degree	36,943
Bachelor's degree	53,576
Graduate or professional degree	74,498

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The Education and Health Care Services Sector is the largest single sector in terms of number of employees in Lehigh County, at 20,678 employees. Following the Education and Health Care Services sector, Manufacturing employs the second-most employees at 11,167. Retail trade also employ more than 10,000 employees. Lehigh County currently has 27,295 jobs in the Education and Health Care Services Sector, showing a slight imbalance between jobs available and employees in that sector with 75% of jobs in that sector filled. Similarly, 80.7% of the 10,808 jobs in Arts, Entertainment, Accommodation sectors are filled. There are 10,967 jobs in Transportation and Warehousing sector, with only 46.0% of jobs filled in this sector.

Describe the workforce and infrastructure needs of the business community:

- There is an imbalance between the number of jobs available and the number of employees qualified to fill the positions. Workforce Board LV attempts to help unemployed persons find employment.
- Lehigh County has become a major shipping and distribution hub.
- The increase in truck traffic causes the infrastructure in the area to age quickly. Infrastructure near the shipping and distribution centers is in need of repairs and replacement.
- Shipping companies tend to not be located on public transit lines. This makes it difficult for employees without vehicles to access these jobs.
- Carpooling and vanpooling have only been successful in select communities, such as immigrant groups. Otherwise, carpooling and vanpooling programs fall apart.
- Federal apprenticeship programs are generally underutilized, though they are available.
- Many employees need daycare for their children. Daycare is a major issue for all potential workers.
- Community Colleges in the area have seen shrinking enrollment, and people are not utilizing these services to gain employment.
- Workforce Board LV is starting a pilot program to provide wrap-around services for 13-16 people seeking employment in the Lehigh Valley.
- A portion of Lehigh County's immigrant population is very educated, but cannot access jobs with higher compensation rates due to their limited English proficiency.
- There is a need for improved career readiness programs across the County.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Lehigh County is a large geographic area that expects consistent population growth and subsequent economic growth. ADP® plans to open a large headquarters in downtown Allentown, which will bring a large number of jobs to the region and bring additional workers. Benefits to Allentown will cause economic growth in the surrounding peripheral communities in the County and provide additional opportunities for job growth. Additional workforce development and job training will be required to fill positions at ADP®, as well as other positions that may open with the continued revitalization of downtown Allentown.

There are transportation and shipping hubs that have developed in Lehigh County. These developments require additional employees and infrastructure. Many of these hubs are located in industrial parks that have few transit links for employees. The heavy freight traffic also causes the infrastructure in the area to deteriorate faster than initially anticipated at the time of construction. There is a need for additional infrastructure and improved infrastructure to reach these transportation and shipping hubs.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

With employment in Lehigh County focused on Education/Health Care and the Manufacturing Sectors, the County has a relatively even mix of Associate/Bachelor/Graduate degree individuals (42%) and High School Graduate/Some College individuals (50%). It should be noted, that over 60% of the workforce in Lehigh County is above the age of 45. Additionally, of that older workforce age 45 and above, 30,507 (26%) have a bachelor's degree or higher.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Workforce Board Lehigh Valley has multiple initiatives to train workers in the region. Workforce Board Lehigh Valley provides training for multiple types of positions and attempts to fill gaps that arise from the poor school system in the area. They are beginning a pilot program for 13-16 individuals seeking employment in the Lehigh Valley which will include wrap-around services for trainees. Communities in Schools also seeks to fill these gaps with career supports and soft skill education for at-risk youth.

There is also a need to assist workers that do not speak English. There is a population of workers who have advanced degrees, but their English skills are lacking and they are underemployed. Lehigh County works with Lehigh Carbon Community College and the Literacy Center to provide ESL lessons to residents of the County at various levels of education. The Literacy Center also provides Adult Basic Education and GED courses for workforce development.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Lehigh County does not participate in a Comprehensive Economic Development Strategy.

Lehigh Economic Development Corporation seeks to meet the needs of employers in the area with the goal of attracting larger businesses to the region. They market the land, space, and talent for companies to come to the Lehigh Valley Region and either open a business or grow their business. Lehigh Economic Development Corporation works to market the region to employers, which benefits the residents of Lehigh County and creates opportunities for community and economic development in the county.

Discussion

As of April 2019, the unemployment rate in Lehigh County was 3.5%, compared to 3.4% for Lehigh Valley Region, 3.8% for the Commonwealth of Pennsylvania, and 3.6% for the Country as a whole. The County has enjoyed a relatively low unemployment rate; however, the need for jobs and job training for the disabled and very low income remains a priority.

DRAFT #3

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

Generally, housing problems in Lehigh County are concentrated in the older areas of the County. These are typically the incorporated sections of the County, such as the Boroughs of Alburtis, Catasauqua, Coopersburg, Coplay, Emmaus, Fountain Hill, Macungie, and Slatington. The Borough of Slatington in particular has a concentration of housing problems.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

There are no Racially Concentrated Areas of Poverty or Ethnically Concentrated Areas of Poverty (RCAPS or ECAPS) in Lehigh County's jurisdiction.

An area, which has a higher concentration of minorities than the County as a whole, can be considered a place where these families are concentrated. The following areas have higher rates of minority residents when compared to the County as a whole according to American Community Survey data: Fountain Hill Borough has a population which is 20.78% Hispanic and 6.94% Black; Macungie Borough has a population which is 9.58% Hispanic; Slatington Borough has a population which is 5.58% Hispanic; Lower Macungie Township (Ancient Oaks CDP) has a population which is 6.22% Asian, 5.78% Hispanic, and 3.78% Black; and Whitehall Township (Fullerton CDP) has a population which is 21.04% Hispanic, 9.55% Asian, and 7.26% Black.

According to National Origin maps and data, there is a higher rate of concentration of residents by national origin than by race. A Vietnamese population is concentrated in Lower Macungie Township (Ancient Oaks CDP), Macungie Borough, and Upper Saucon Township. There are Vietnamese and German populations in Whitehall Township (Hokendauqua CDP and Fullerton CDP respectively). There are also German populations in Lower Macungie Township (Ancient Oaks CDP), and Upper Saucon Township. Residents of Chinese descent are concentrated in Coopersburg Borough, Upper Macungie Township, and Catasauqua Borough. Descendants of the Dominican Republic are concentrated in the areas around Emmaus Borough, Whitehall Township (Hokendauqua CDP), and Whitehall Township (Fullerton CDP). An Indian population is concentrated in North Whitehall Township (Schnecksville Section), Alburtis Borough, and the immediate areas just north and west of the City of Allentown.

What are the characteristics of the market in these areas/neighborhoods?

These boroughs and sections of townships vary in their characteristics, where some of the municipalities have active commercial districts while others have vacant commercial properties that line their business districts. The housing stock in these areas also range from "sound" to "in need of major rehabilitation."

There are other portions of the County that are rural in character but have a high demand for growth in industry and housing in these areas. The County seeks to balance the development and preservation of farmland.

Are there any community assets in these areas/neighborhoods?

Multiple municipalities in Lehigh County have historic districts that can provide a focal point for rehabilitation and growth within their communities. There are historic districts in the Boroughs of Catasauqua, Coopersburg, Fountain Hill, and Slatington.

There are strong linkages between many of the governmental organizations, non-profits, and private industries in Lehigh County. Because of stakeholders' willingness to collaborate, there is the potential for partnerships that can vastly improve neighborhoods.

Are there other strategic opportunities in any of these areas?

The continued growth of Lehigh County's population is a major opportunity for the area. Population growth will lead to a demand for improved housing and amenities, and subsequent private investment to meet these demands.

Much of the high growth in Lower Saucon Township can lead to its designation as an Opportunity Zone. However, the land prices in this area are high, and that can act as a barrier.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The "Vision" of this Five Year Consolidated Plan is to serve as a consolidated planning document, an application, and a strategic plan for Lehigh County. As part of the Five Year Consolidated Plan, the community develops goals and objectives. The following strategies with subsequent goals and priorities have been identified for Lehigh County for the period of FY 2019 through FY 2023 for the Community Development Block Grant (CDBG) Program:

HOUSING STRATEGY - HSS

Goal:

Improve, preserve, and expand the supply of affordable housing for low- and moderate-income persons and families in Lehigh County.

Objectives:

- **HSS-1 Home Ownership** - Promote and assist in developing homeownership opportunities for low- and moderate-income persons & families.
- **HSS-2 Mixed Income Housing** - Promote and assist in the development of mixed income housing, both rental housing and housing for homebuyers.
- **HSS-3 Housing Rehabilitation** - Promote and assist in the preservation of existing owner and renter occupied housing stock in the County.
- **HSS-4 Housing Construction** - Promote and assist in the development of affordable housing, both rental and sales housing.
- **HSS-5 Revitalization** - Promote and assist in the stabilization of residential neighborhoods by removing slums and blight, assembling sites for new housing, rehabilitation of existing housing, and code enforcement.
- **HSS-6 Fair Housing** - Affirmatively further fair housing by promoting fair housing choice throughout Lehigh County.
- **HSS-7 Housing Support** - Promote and assist in housing counseling and support services to low- and moderate-income persons and families.

HOMELESS STRATEGY - HOM

Goal:

Improve the living conditions and services for homeless persons and families in Lehigh County.

Objectives:

- **HOM-1 Housing** - Promote and assist in developing housing opportunities for homeless persons, families, and those who are at-risk of becoming homeless.
- **HOM-2 Operations/Support** - Promote and assist in program support services for the homeless.
- **HOM-3 Homeless Prevention** - Promote and assist in anti-eviction and prevention of unfair housing practices, which may contribute to homelessness.

SPECIAL NEEDS STRATEGY - SNS

Goal:

Improve, preserve, and expand facilities for persons with special needs and the disabled in Lehigh County.

Objectives:

- **SNS-1 Housing** - Promote and assist to increase the supply of affordable, decent, safe, sound, and accessible housing for the elderly, persons with disabilities, and persons with other special needs through rehabilitation of existing housing and new construction of accessible housing.
- **SNS-2 Social Services** - Promote and assist to support social service programs and facilities for the elderly, persons with disabilities, and persons with other special needs.
- **SNS-3 Accessibility** - Promote and assist in making accessibility improvements to owner-occupied housing through rehabilitation and improve renter-occupied housing by making reasonable accommodations for the physically disabled.

COMMUNITY DEVELOPMENT STRATEGY - CDS

Goal:

Improve, preserve, and create new public and community facilities, infrastructure, and public services to ensure the quality of life for all residents of Lehigh County.

Objectives:

- **CDS-1 Community Facilities** - Assist in improving parks, recreational centers, trails, libraries, and other public and community facilities throughout the County.
- **CDS-2 Infrastructure** - Assist in improving the public infrastructure through rehabilitation, reconstruction, and new construction.

- **CDS-3 Public Services** - Assist in improving and increasing public safety, municipal services, and public service and human service programs throughout Lehigh County.
- **CDS-4 Accessibility** - Assist in improving the physical and visual accessibility of community facilities, infrastructure, and public buildings throughout the County.
- **CDS-5 Public Safety** - Assist in improving the public safety facilities, equipment, and ability for first responders for emergency situations throughout the County.
- **CDS-6 Clearance** - Assist in removing and eliminating slums and blighting conditions through demolition of vacant, abandoned, unsafe and dilapidated structures throughout the County.
- **CDS-7 Public Transit** - Promote development of additional bus routes and improved public transportation for low- and moderate-income persons.

ECONOMIC DEVELOPMENT STRATEGY - EDS

Goal:

Increase and promote job creation, job retention, self-sufficiency, education, job training, technical assistance, and economic empowerment of low- and moderate-income residents of Lehigh County.

Objectives:

- **EDS-1 Employment** - Support and encourage new job creation, job retention, employment, and job training services.
- **EDS-2 Financial Assistance** - Support business and commercial growth through expansion and new development with technical and financial assistance programs.
- **EDS-3 Revitalization** - Support and promote plans for new development and redevelopment to revitalize distressed areas of Lehigh County.
- **EDS-4 Financial Incentives** - Support and encourage new economic development through local, state and Federal tax incentives and programs.

ADMINISTRATION, PLANNING, AND MANAGEMENT STRATEGY - APM

Goal:

Provide sound and professional planning, administration, oversight and management of Federal, state, and local funded programs.

Objectives:

- **APM-1 Coordination** - Continue to provide sound and professional planning, program management and oversight for the successful administration of Federal, state, and local funded programs.

- **APM-2 Planning** - Continue to develop and plan for special studies, environmental clearance, fair housing, and compliance with all Federal, state, and local laws and regulations.

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SP-10 Geographic Priorities – 91.215 (a)(1)**Geographic Area**

1.	Area Name:	County Wide
	Area Type:	Local Target area
	Other Target Area Description:	Low- and Moderate-Income Areas
	HUD Approval Date:	
	% of Low/ Mod:	28.23%
	Revital Type:	Comprehensive
	Other Revital Description:	

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<p>Identify the neighborhood boundaries for this target area.</p>	<ul style="list-style-type: none"> • C.T. 1900, B.G. 1 • C.T. 5100, B.G. 3 • C.T. 5100, B.G. 4 • C.T. 5702, B.G. 2 • C.T. 5702, B.G. 3 • C.T. 5703, B.G. 3 • C.T. 5704, B.G. 1 • C.T. 5800, B.G. 1 • C.T. 5901, B.G. 4 • C.T. 5901, B.G. 5 • C.T. 6001, B.G. 2 • C.T. 6101, B.G. 1 • C.T. 6800, B.G. 1 • C.T. 6800, B.G. 4 <p>Additionally, because Lehigh County is an exception grantee and all Census Tracts where at least 39.01% of households with low- and moderate-incomes are CDBG eligible, the following Census Tracts and Block Groups are eligible:</p> <ul style="list-style-type: none"> • C.T. 5100, B.G. 2 • C.T. 5200, B.G. 3 • C.T. 5601, B.G. 1 • C.T. 5602, B.G. 4 • C.T. 5702, B.G. 1 • C.T. 5704, B.G. 2 • C.T. 5800, B.G. 3 • C.T. 5901, B.G. 3 • C.T. 5902, B.G. 1 • C.T. 6001, B.G. 3 • C.T. 6001, B.G. 5 • C.T. 6101, B.G. 3 • C.T. 6202, B.G. 2 • C.T. 6202, B.G. 3 • C.T. 6303, B.G. 3 • C.T. 6500, B.G. 2 • C.T. 6500, B.G. 3 • C.T. 6701, B.G. 2 • C.T. 6702, B.G. 2 • C.T. 6703, B.G. 3 • C.T. 6902, B.G. 2
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Include specific housing and commercial characteristics of the area.	Housing in the older areas require rehabilitation, both for renters and homeowners. Some of these block groups lie in the flood plain.
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	HUD's Low-Mod Income data assisted in the identification of these areas. Consultations with local public officials and social services that served the area confirmed the Census Tracts and Block Groups with the highest need.
Identify the needs in this target area.	There is a need for new housing construction, housing rehabilitation, infrastructure improvements, improvements in parks and recreational facilities, social services to assist groups with special needs, and demolition to clear vacant, blighted properties.
What are the opportunities for improvement in this target area?	Many of the target areas have older housing stock that would be desirable if rehabilitated. The County is growing and there are multiple high-demand locations within the County that can be served with housing construction programs, housing rehabilitation programs, and infrastructure improvements.
Are there barriers to improvement in this target area?	Funding is limited for improvements in these areas and the County must decide where to prioritize the use of its funding.

Table 47 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Lehigh County has allocated its CDBG funds for FY 2019 to principally benefit low- and moderate-income persons.

- The infrastructure improvement activities are either located in a low- and moderate-income census tract/block group or have a low- and moderate-income service area benefit or clientele over 51% low- and moderate-income.
- The Public Services activities are either located in a low- and moderate-income census area or have a low- and moderate-income services area benefit or clientele.
- The Public Facilities activities are either located in a low- and moderate-income census area or have a low- and moderate-income service area benefit or clientele.
- Demolition of structures that are either located in a low- and moderate-income census area, or fall under removal of slum and blight on a spot basis.

- The housing activities for first time homebuyers and housing rehabilitation program have an income eligibility criteria; therefore, the income requirement restricts funds to low- and moderate-income households throughout the County.
- Economic development projects will either be located in a low- and moderate-income census tract/block group, or a poverty tract greater than 20%, or part of a redevelopment plan, or making 51% of the jobs available to low- and moderate-income population.

The proposed activities and projects for FY 2019 are located in areas of the County with the highest percentages of low- and moderate-income persons, and those block groups with a higher than average percentage of minority persons. The following census tracts and block groups have at least 51% of the households with low- and moderate-incomes:

- C.T. 1900, B.G. 1 – South Whitehall Township
- C.T. 5100, B.G. 3 – Slatington Borough
- C.T. 5100, B.G. 4 – Slatington Borough
- C.T. 5702, B.G. 2 – Whitehall Township
- C.T. 5702, B.G. 3 – Whitehall Township
- C.T. 5703, B.G. 3 – Whitehall Township
- C.T. 5704, B.G. 1 – Whitehall Township
- C.T. 5800, B.G. 1 – Coplay Borough
- C.T. 5901, B.G. 4 – Catasauqua Borough
- C.T. 5901, B.G. 5 – Catasauqua Borough
- C.T. 6001, B.G. 2 – South Whitehall Township
- C.T. 6101, B.G. 1 – South Whitehall Township
- C.T. 6800, B.G. 1 – Fountain Hill Borough
- C.T. 6800, B.G. 4 – Fountain Hill Borough

Additionally, because Lehigh County is an exception grantee and all Census Tracts where at least 39.01% of households with low- and moderate-incomes are CDBG eligible, the following Census Tracts and Block Groups are eligible:

- C.T. 5100, B.G. 2 – Slatington Borough (47.57% LMI)
- C.T. 5200, B.G. 3 – Washington Township (44.52% LMI)
- C.T. 5601, B.G. 1 – Whitehall Township (43.24% LMI)
- C.T. 5602, B.G. 4 – Whitehall Township (43.41% LMI)
- C.T. 5702, B.G. 1 – Whitehall Township (49.31% LMI)
- C.T. 5704, B.G. 2 – Whitehall Township (43.46% LMI)
- C.T. 5800, B.G. 3 – Coplay Borough (50.39% LMI)
- C.T. 5901, B.G. 3 – Catasauqua Borough (41.35% LMI)
- C.T. 5902, B.G. 1 – Hanover Township (42.22% LMI)

- C.T. 6001, B.G. 3 – South Whitehall Township (44.62% LMI)
- C.T. 6001, B.G. 5 – South Whitehall Township (41.46% LMI)
- C.T. 6101, B.G. 3 – South Whitehall Township (46.80% LMI)
- C.T. 6202, B.G. 2 – Upper Macungie Township (44.80% LMI)
- C.T. 6202, B.G. 3 – Upper Macungie Township (40.70% LMI)
- C.T. 6303, B.G. 3 – Macungie Borough (40.51% LMI)
- C.T. 6500, B.G. 2 – Emmaus Borough (50.00% LMI)
- C.T. 6500, B.G. 3 – Emmaus Borough (47.89% LMI)
- C.T. 6701, B.G. 2 – Salisbury Township (40.12% LMI)
- C.T. 6702, B.G. 2 – Salisbury Township (39.01% LMI)
- C.T. 6703, B.G. 3 – Salisbury Township (43.81% LMI)
- C.T. 6902, B.G. 2 – Coopersburg Borough & Upper Saucon Township (43.95% LMI)

DRAFT #3

SP-25 Priority Needs - 91.215(a)(2)**Priority Needs****Table 4 – Priority Needs Summary**

1	Priority Need Name	Housing Priority
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly
	Geographic Areas Affected	County Wide
	Associated Goals	HSS-1 Home Ownership HSS-2 Mixed Income Housing HSS-3 Housing Rehabilitation HSS-4 Housing Construction HSS-5 Revitalization HSS-6 Fair Housing HSS-7 Housing Support
	Description	Improve, preserve, and expand the supply of affordable housing for low- and moderate-income persons and families in Lehigh County.

	Basis for Relative Priority	There is a need for affordable, accessible, decent housing in Lehigh County. There is a need to increase the quality of the housing stock in the County for renters, homeowners, and homebuyers.
2	Priority Need Name	Homeless Priority
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	County Wide
	Associated Goals	HOM-1 Housing HOM-2 Operation/Support HOM-3 Homeless Prevention
	Description	Improve the living conditions and services for homeless persons and families in Lehigh County.
	Basis for Relative Priority	There is a need to assist the homeless by providing housing, counseling, and other services in Lehigh County.

3	Priority Need Name	Other Special Needs Priority
	Priority Level	Low
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	County Wide
	Associated Goals	SNS-1 Housing SNS-2 Social Services SNS-3 Accessibility
	Description	Improve, preserve, and expand facilities for persons with special needs and the disabled in Lehigh County.
	Basis for Relative Priority	There is a need to assist persons with special needs by expanding facilities and services for individuals with disabilities, the elderly, and other persons who have special needs.
4	Priority Need Name	Community Development Priority
	Priority Level	High

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Non-housing Community Development
	Geographic Areas Affected	County wide
	Associated Goals	CDS-1 Community Facilities CDS-2 Infrastructure CDS-3 Public Services CDS-4 Accessibility CDS-5 Public Safety CDS-6 Clearance CDS-7 Public Transit
	Description	Improve, preserve, and create new public and community facilities, infrastructure, and public services to ensure the quality of life for all residents of Lehigh County.
	Basis for Relative Priority	There is a need to improve public and community facilities, infrastructure, public transit, public services, public safety, and the quality of life in Lehigh County.
5	Priority Need Name	Economic Development Priority
	Priority Level	Low

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Non-housing Community Development
	Geographic Areas Affected	County Wide
	Associated Goals	EDS-1 Employment EDS-2 Financial Assistance EDS-3 Revitalization EDS-4 Financial Incentives
	Description	Increase and promote job creation, job retention, self-sufficiency, education, job training, technical assistance, and economic empowerment of low- and moderate-income residents of Lehigh County.
	Basis for Relative Priority	There is a need to increase employment, self-sufficiency, education, job training, technical assistance, and economic empowerment of the residents of Lehigh County.
6	Priority Need Name	Administration, Planning, and Management Priority
	Priority Level	High

Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
Geographic Areas Affected	County Wide
Associated Goals	APM-1 Coordination APM-2 Planning
Description	Provide sound and professional planning, administration, oversight and management of Federal, state, and local funded programs.
Basis for Relative Priority	There is a continuing need for planning, administration, management, and oversight of Federal, state, and local funded programs.

Narrative (Optional)

The priority ranking of needs for housing; homelessness; other special needs; community development; economic development; and administration, planning, and management are as follows:

- **High Priority** - Activities are assigned a high priority if the County expects to fund them during the Five Year Consolidated Plan period.
- **Low Priority** - Activities are assigned a low priority if the activity may not be funded by the County during the Five Year Consolidated Plan period. The County may support applications for other funding if those activities are consistent with the needs identified in the Five Year Consolidated Plan.

DRAFT #3

SP-30 Influence of Market Conditions – 91.215 (b)**Influence of Market Conditions**

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Lehigh County does not provide Tenant Based Rental Assistance.
TBRA for Non-Homeless Special Needs	Lehigh County does not provide Tenant Based Rental Assistance.
New Unit Production	There is a high priority for new housing units in Lehigh County. The County needs affordable, decent, safe, and sanitary housing.
Rehabilitation	There is a high demand in Lehigh County to provide rehabilitation assistance. The County needs affordable, accessible, decent, safe, and sanitary housing that could be accomplished through rehabilitation.
Acquisition, including preservation	The cost to acquire property is expensive, especially when relocation benefits are required. There are four (4) historic districts in the County outside of the Cities of Allentown and Bethlehem, located in Fountain Hill, Slatington, Catasauqua, and Coopersburg. There is also the George Taylor House Museum in the Borough of Catasauqua.

Table 48 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

Lehigh County is receiving \$1,216,119 from CDBG funds. The program year goes from October 1st through September 30th of each year. These funds will be used to address the following priority needs:

- Housing
- Homeless
- Other Special Needs
- Community Development
- Economic Development
- Administration, Planning, and Management

The accomplishments of these projects/activities will be reported in the annual Consolidated Annual Performance and Evaluation Report (CAPER).

Anticipated Resources

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	\$1,216,119.00	\$0.00	\$0.00	\$1,216,119.00	\$4,286,067.00	Five Years of funding at a reduction level each year of 5%. 16 projects/activities were funded based on FY 2019 CDBG allocations.

Table 49 - 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**

In addition to the entitlement funds, Lehigh County anticipates the following federal resources may be available to local non-profit organizations to undertake the housing strategies identified in the Five Year Consolidated Plan:

- Supportive Housing Program
- Low-Income Housing Tax Credit Program (LIHTC)
- Section 8 Rental Assistance Program
- Shelter Plus Care
- Section 8 Moderate Rehabilitation Program for Single Room Occupancy (SRO)
- Public Housing Development

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 (Act 137), 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. Lehigh County has recommended allocating \$574,736 for FY 2109 from the Affordable Housing Trust Fund to allow the funds to grow and be used for future projects.
- **HOME Investment Partnership** - Lehigh County will be receiving HOME funds from the Commonwealth of Pennsylvania's Department of Community and Economic Development. The County will receive \$500,000 in HOME funds in FY 2019.
- **Continuum of Care Grant** - Lehigh County is part of the Lehigh Valley Regional Housing Advisory Board. This is a two (2) county region that applies for Continuum of Care funds each year. In FY 2018, the Lehigh Valley received multi-year funding for thirteen (13) projects totaling \$2,466,453.00 for support services and permanent supportive housing projects throughout the region. Of the thirteen (13) projects funded, twelve (12) were Tier 1 awards, and one (1) was Tier 2 awards.
- **The Lehigh County Housing Authority** - Expects to receive \$506,299.00 in FY 2019 funds from the Public Housing Capital Fund Program, as well as Public Housing Operating funds and Section 8 Housing Choice Voucher assistance.
- **Emergency Solutions Grant (ESG) Funds** - Lehigh County will apply for ESG grants from the Pennsylvania Department of Community and Economic Development during FY 2019.
- Other federal funds that may be used in support of housing, community development, and economic development during FY 2019 include loans through HUD's Section 108 Loan Program, Brownfields Economic Development Initiative (BEDI) grants, and HUD Supportive Housing Programs.

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

Not applicable. The County has not acquired or improved any land, property, or buildings that are available for sale by using CDBG funds.

Discussion

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Lehigh County	Government	Planning	Jurisdiction
Lehigh County Housing Authority	PHA	LIHTC Public Housing Rental	Region
Eastern PA Continuum of Care	Continuum of Care	Homelessness Non-homeless special needs Planning Public Services Rental	Region
Lehigh County Conference of Churches	Non-profit organization	Homelessness	Region

Table 50 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The following services are targeted to the homeless:

The Lehigh County Conference of Churches provides food for homeless people and families in conjunction with Catholic Charities. Both organizations also provide shelter for homeless people.

Valley Youth House serves unaccompanied youth in the Lehigh Valley. They offer shelter for youth up to the age of 18.

Turning Point of the LV provides shelter for domestic violence victims in Lehigh County. They provide Emergency Shelter and Rapid Rehousing services for victims and their families.

The YMCA and Salvation Army will provide emergency shelter during weather advisory days, particularly during the coldest weeks of the winter. The YMCA provides shelter for men and the Salvation Army provides shelter for women.

Lehigh Valley Health Network's Comprehensive Health Services provides free care for those infected with HIV/AIDS. Individuals with HIV/AIDS will not be allowed to seek treatment for addictions unless they are treated for HIV/AIDS first.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Persons with HIV/AIDS and their families comprise a small percentage of the County's overall population, but that population is often more impoverished than the remainder of the County. Roughly 60% of those seeking help through Comprehensive Health Services of the Lehigh Valley are under 50% of the poverty line. Comprehensive Health Services assists over 1,000 people with HIV/AIDS, approximately 40 of whom have an active addiction. The Point in Time Count for Lehigh County in 2017 counted 2 persons with HIV/AIDS that were either sheltered or unsheltered homeless, 1 person in 2018 and 0 persons in 2019.

Comprehensive Health Services of the Lehigh Valley assists persons infected with HIV/AIDS. Many of their programs follow patients for multiple years. Though many of the persons they serve have previously had addictions, the majority of their patients do not have active addictions. Comprehensive Health Services will serve persons with active addictions who are also infected with HIV/AIDS before they are allowed to participate in recovery services. Many of these programs assist in the prevention of homelessness by providing wrap-around assistance to those at risk of becoming homeless.

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X		
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement			
Mobile Clinics			
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X		
Education	X		
Employment and Employment Training	X	X	
Healthcare	X		
HIV/AIDS	X		
Life Skills	X	X	
Mental Health Counseling	X		
Transportation	X		

Table 51 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Persons with HIV/AIDS and their families comprise a small percentage of the County's overall population, but that population is often more impoverished than the remainder of the County. Roughly 60% of those seeking help through Comprehensive Health Services of the Lehigh Valley are under 50% of the poverty line. Comprehensive Health Services assists over 1,000 people with HIV/AIDS, approximately 40 of whom have an active addiction. The Point in Time Count for Lehigh County in 2017 counted 2 persons with HIV/AIDS that were either sheltered or unsheltered homeless, 1 person in 2018 and 0 persons in 2019.

Comprehensive Health Services of the Lehigh Valley assists persons infected with HIV/AIDS. Many of their programs follow patients for multiple years. Though many of the persons they serve have previously had addictions, the majority of their patients do not have active addictions. Comprehensive Health Services will serve persons with active addictions who are also infected with HIV/AIDS before they are allowed to participate in recovery services. Many of these programs assist in the prevention of homelessness by providing wrap-around assistance to those at risk of becoming homeless.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Many of the homeless providers in Lehigh County cooperate and are capable of ensuring homeless persons and persons with special needs are able to find relevant services. This includes public entities. Valley Housing Development Corporation, which is Lehigh County Housing Authority's development entity, receives CoC funding for Supportive Housing Programs to provide housing for homeless individuals to make the transition from homelessness to permanent housing and self-sufficiency.

There is a need for a shelter that operates year-round at all hours of the day. However, this type of shelter is difficult to fund. There is also a need for a shelter for youths aged 18-24. This is a large homeless demographic in the Lehigh Valley Area, and the CoC has been aggressively conducting outreach to ensure that these youths are referred to relevant services. There is also a need for programs to treat opioid addictions, as they are severely lacking in Lehigh County. Public transit in the area has also been resistant to create referral-based bus routes for people with special needs.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Lehigh County has partnered with various County agencies, nonprofits, and service providers to carry out the services required by special needs populations. However, there are significant needs for mental health services and addiction counseling services in the region. There is also a need to provide public transit to bring special needs populations to the places where they can receive services. Lehigh County

will continue to partner with nonprofits that manage partnerships with these organizations and assist persons with special needs.

DRAFT #3

SP-45 Goals Summary – 91.215(a)(4)**Goals Summary Information**

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HSS-1 Home Ownership	2019	2023	Affordable Housing	County Wide	Housing Priority	CDBG: \$0	Homeowner Housing Added: 0 Household Housing Unit
2	HSS-2 Mixed Income Housing	2019	2023	Affordable Housing	County Wide	Housing Priority	CDBG: \$0	Homeowner Housing Added: 0 Household Housing Unit
3	HSS-3 Housing Rehabilitation	2019	2023	Affordable Housing	County Wide	Housing Priority	CDBG: \$1,000,000	Homeowner Housing Rehabilitated: 15 Household Housing Unit
4	HSS-4 Housing Construction	2019	2023	Affordable Housing	County Wide	Housing Priority	CDBG: \$0	Rental units constructed: 0 Household Housing Unit Homeowner Housing Added: 0 Household Housing Unit
5	HSS-5 Revitalization	2019	2023	Affordable Housing	County Wide	Housing Priority	CDBG: \$0	Other: 0 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	HSS-6 Fair Housing	2019	2023	Affordable Housing	County Wide	Housing Priority	CDBG: \$50,000	Public service activities for Low/Moderate Income Housing Benefit: 200 Households Assisted Other: 5 Other
7	HSS-7 Housing Support	2019	2023	Affordable Housing	County Wide	Housing Priority	CDBG: \$0	Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted
8	HOM-1 Housing	2019	2023	Homeless	County Wide	Homeless Priority	CDBG: \$148,500	Public service activities for Low/Moderate Income Housing Benefit: 150 Households Assisted
9	HOM-2 Operation/Support	2019	2023	Homeless	County Wide	Homeless Priority	CDBG: \$0	Overnight/Emergency Shelter/Transitional Housing Beds added: 0 Beds

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	HOM-3 Homeless Prevention	2019	2023	Homeless	County Wide	Homeless Priority	CDBG: \$0	Homelessness Prevention: 0 Persons Assisted
11	SNS-1 Housing	2019	2023	Non-Homeless Special Needs	County Wide	Other Special Needs Priority	CDBG: \$0	Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted Rental units constructed: 0 Household Housing Unit Homeowner Housing Added: 0 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
12	SNS-2 Social Services	2019	2023	Non-Homeless Special Needs	County Wide	Other Special Needs Priority	CDBG: \$0	<p>Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted</p> <p>Rental units constructed: 0 Household Housing Unit</p> <p>Homeowner Housing Added: 0 Household Housing Unit</p>

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
13	SNS-3 Accessibility	2019	2023	Non-Homeless Special Needs	County Wide	Other Special Needs Priority	CDBG: \$0	Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted Rental units rehabilitated: 0 Household Housing Unit Homeowner Housing Rehabilitated: 0 Household Housing Unit
14	CDS-1 Community Facilities	2019	2023	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$441,170	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 20265 Persons Assisted Other: 5 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
15	CDS-2 Infrastructure	2019	2023	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$1,630,861	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 15260 Persons Assisted Other: 5 Other
16	CDS-3 Public Services	2019	2023	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$502,810	Public service activities other than Low/Moderate Income Housing Benefit: 1045 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
17	CDS-4 Accessibility	2019	2023	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$628,500	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 30440 Persons Assisted Other: 10 Other
18	CDS-5 Public Safety	2019	2023	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted
19	CDS-6 Clearance	2019	2023	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$0	Buildings Demolished: 0 Buildings
20	CDS-7 Public Transit	2019	2023	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$0	Other: 0 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
21	EDS-1 Employment	2019	2023	economic development	County Wide	Economic Development Priority	CDBG: \$0	Jobs created/retained: 0 Jobs Businesses assisted: 0 Businesses Assisted
22	EDS-2 Financial Assistance	2019	2023	economic development	County Wide	Economic Development Priority	CDBG: \$0	Businesses assisted: 0 Businesses Assisted
23	EDS-3 Revitalization	2019	2023	Non-Housing Community Development	County Wide	Economic Development Priority	CDBG: \$0	Other: 0 Other
24	EDS-4 Financial Incentives	2019	2023	economic development	County Wide	Economic Development Priority	CDBG: \$0	Other: 0 Other
25	APM-1 Coordination	2019	2023	Non-Housing Community Development administrative management	County Wide	Administration, Planning, and Management Priority	CDBG: \$1,100,345	Other: 5 Other
26	APM-2 Planning	2019	2023	Non-Housing Community Development administrative management	County Wide	Administration, Planning, and Management Priority	CDBG: \$0	Other: 5 Other

Table 49 – Goals Summary

Goal Descriptions

1	Goal Name	HSS-1 Home Ownership
	Goal Description	Promote and assist in developing homeownership opportunities for low- and moderate-income persons & families.
2	Goal Name	HSS-2 Mixed Income Housing
	Goal Description	Promote and assist in the development of mixed income housing, both rental housing and housing for homebuyers.
3	Goal Name	HSS-3 Housing Rehabilitation
	Goal Description	Promote and assist in the preservation of existing owner and renter occupied housing stock in the County.
4	Goal Name	HSS-4 Housing Construction
	Goal Description	Promote and assist in the development of affordable housing, both rental and sales housing.
5	Goal Name	HSS-5 Revitalization
	Goal Description	Promote and assist in the stabilization of residential neighborhoods by removing slums and blight, assembling sites for new housing, rehabilitation of existing housing, and code enforcement.
6	Goal Name	HSS-6 Fair Housing
	Goal Description	Affirmatively further fair housing by promoting fair housing choice throughout Lehigh County.
7	Goal Name	HSS-7 Housing Support
	Goal Description	Promote and assist in housing counseling and support services to low- and moderate-income persons and families.

8	Goal Name	HOM-1 Housing
	Goal Description	Promote and assist in developing housing opportunities for homeless persons, families, and those who are at-risk of becoming homeless.
9	Goal Name	HOM-2 Operation/Support
	Goal Description	Promote and assist in program support services for the homeless.
10	Goal Name	HOM-3 Homeless Prevention
	Goal Description	Promote and assist in anti-eviction and prevention of unfair housing practices, which may contribute to homelessness.
11	Goal Name	SNS-1 Housing
	Goal Description	Promote and assist to increase the supply of affordable, decent, safe, sound, and accessible housing for the elderly, persons with disabilities, and persons with other special needs through rehabilitation of existing housing and new construction of accessible housing.
12	Goal Name	SNS-2 Social Services
	Goal Description	Promote and assist to support social service programs and facilities for the elderly, persons with disabilities, and persons with other special needs.
13	Goal Name	SNS-3 Accessibility
	Goal Description	Promote and assist in making accessibility improvements to owner-occupied housing through rehabilitation and improve renter-occupied housing by making reasonable accommodations for the physically disabled.

14	Goal Name	CDS-1 Community Facilities
	Goal Description	Assist in improving parks, recreational centers, trails, libraries, and other public and community facilities throughout the County.
15	Goal Name	CDS-2 Infrastructure
	Goal Description	Assist in improving the public infrastructure through rehabilitation, reconstruction, and new construction.
16	Goal Name	CDS-3 Public Services
	Goal Description	Assist in improving and increasing public safety, municipal services, and public service and human service programs throughout Lehigh County.
17	Goal Name	CDS-4 Accessibility
	Goal Description	Assist in improving the physical and visual accessibility of community facilities, infrastructure, and public buildings throughout the County.
18	Goal Name	CDS-5 Public Safety
	Goal Description	Assist in improving the public safety facilities, equipment, and ability for first responders for emergency situations throughout the County.
19	Goal Name	CDS-6 Clearance
	Goal Description	Assist in removing and eliminating slums and blighting conditions through demolition of vacant, abandoned, unsafe and dilapidated structures throughout the County.
20	Goal Name	CDS-7 Public Transit
	Goal Description	Promote development of additional bus routes and improved public transportation for low- and moderate-income persons.
21	Goal Name	EDS-1 Employment
	Goal Description	Support and encourage new job creation, job retention, employment, and job training services.

22	Goal Name	EDS-2 Financial Assistance
	Goal Description	Support business and commercial growth through expansion and new development with technical and financial assistance programs.
23	Goal Name	EDS-3 Revitalization
	Goal Description	Support and promote plans for new development and redevelopment to revitalize distressed areas of Lehigh County.
24	Goal Name	EDS-4 Financial Incentives
	Goal Description	Support and encourage new economic development through local, state and Federal tax incentives and programs.
25	Goal Name	APM-1 Coordination
	Goal Description	Continue to provide sound and professional planning, program management and oversight for the successful administration of Federal, state, and local funded programs.
26	Goal Name	APM-1 Planning
	Goal Description	Continue to develop and plan for special studies, environmental clearance, fair housing, and compliance with all Federal, state, and local laws and regulations.

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 91.315(b)(2)

Lehigh County proposes to assist the following:

- **Extremely Low-Income** - 20 families
- **Low-Income** - 150 families
- **Moderate-Income** - 15 families

SP-50 Public Housing Accessibility and Involvement – 91.215(c)**Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

The Lehigh County Housing Authority has been found in compliance with section 504. No additional compliance is needed.

The Lehigh County Housing Authority currently has 15 fully accessible units and 11 semi-accessible units.

Activities to Increase Resident Involvements

There are currently no Resident Councils at properties owned and managed by the Lehigh County Housing Authority. Previous attempts have been made to create Resident Councils. However, these councils have all disbanded due to lack of interest on the part of tenants.

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. LCHA has a baseline of 1,652 Section 8 Housing Choice Vouchers, with 1,100 applications on the waiting list. The Lehigh County Housing Authority has selected residents to access and review its Annual Action Plan when available.

Is the public housing agency designated as troubled under 24 CFR part 902?

The Lehigh County Housing Authority is not designated as troubled.

Plan to remove the 'troubled' designation

Not Applicable.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Lehigh County's 2018 Analysis of Impediments to Fair Housing Choice has identified the following impediments, along with goals and strategies to address those impediments and affirmatively further fair housing in the County:

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Impediment 1: Lack of Affordable Housing - There is a lack of affordable housing in Lehigh County due to the influx in the number of unskilled and semi-skilled workers who have moved into the County, which has created a high demand and a corresponding increase in the cost of rental and sales housing.

Goal: Increase the supply of affordable housing by new construction and rehabilitation of various types of housing that is affordable to lower income households.

Strategies: In order to address the need and achieve the goal for more affordable housing, the following activities and strategies should be undertaken:

- **1-A:** Continue to promote the need for affordable housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is affordable.
- **1-B:** Encourage and promote the development, construction, and/or rehabilitation of mixed-income housing in areas of the County which do not have a concentration of low-income households.
- **1-C:** Encourage and promote the development, construction, and/or rehabilitation of affordable housing in mixed-use properties with retail/office space on the lower levels and residences above.
- **1-D:** Support financially, the rehabilitation of existing housing owned by seniors and lower-income households to conserve the existing affordable housing stock in the County.
- **1-E:** Provide financial and development incentive to private developers and non-profits to construct and/or rehabilitate affordable housing.
- **1-F:** Continue to work with the Lehigh Valley Planning Commission Housing Study Group to promote the development, construction, and rehabilitation of affordable housing.

Impediment 2: Lack of Accessible Housing - There is a lack of accessible housing in Lehigh County since the supply of accessible housing has not kept pace with the demand caused by the increase in the percentage of elderly persons in Lehigh County and more disabled persons desiring to live independently.

Goal: Increase the supply of accessible housing by new construction and rehabilitation of accessible housing for persons who are disabled.

Strategies: In order to address the need and achieve the goal for more accessible housing, the following activities and strategies should be undertaken:

- **2-A:** Continue to promote the need for accessible housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is accessible to persons who are disabled.
- **2-B:** Support financially, improvements to single-family owner-occupied homes to make them accessible for the elderly and/or disabled so they can continue to live in their homes.
- **2-C:** Encourage and promote the development of accessible housing units in multi-family buildings as a percentage of the total number of housing units.
- **2-D:** Encourage and financially support landlords to make accommodations to units in their building so persons who are disabled can reside in their apartments.
- **2-E:** Enforce the Americans with Disabilities Act (ADA) and the Fair Housing Act (FHA) in regard to making new multi-family housing developments accessible and visitable for persons who are physically disabled.

Impediment 3: Barriers Limiting Housing Choice - There are physical, economic, and social barriers in Lehigh County which limit housing choices and housing opportunities for low-income households, minorities, and the disabled members of the County's population.

Goal: Eliminate physical, economic, and social barriers in Lehigh County and increase housing choices and opportunities for low-income households and members of the protected classes throughout Lehigh County.

Strategies: In order to achieve the goal for more housing choice, the following activities and strategies should be undertaken:

- **3-A:** Deconcentrate pockets of racial and ethnic poverty by providing affordable housing choices for persons and families to move outside of these areas.
- **3-B:** Support and promote the development of affordable housing in areas of opportunity where low-income persons and families may move.
- **3-C:** Support and promote the planning and model zoning efforts of the Lehigh Valley Planning Commission to eliminate "exclusionary zoning" and land development ordinances which restrict the development of affordable housing.
- **3-D:** Eliminate architectural barriers in public accommodations, public facilities, and multi-family new housing developments.
- **3-E:** Encourage LANta (the public transportation system) to develop additional routes to provide better access to job opportunities for low-income households.

Impediment 4: Lack of Housing Awareness - There is a lack of knowledge and understanding concerning the rights of individuals, families, and members of the protected classes in regard to the Fair Housing Act (FHA) and awareness of discriminatory practices.

Goal: Improve knowledge and awareness of the Fair Housing Act (FHA), related housing and discriminatory laws, and regulations, so that the residents in Lehigh County can Affirmatively Further Fair Housing (AFFH).

Strategies: In order to address the need and achieve the goal of promoting open and fair housing, the following activities and strategies should be undertaken:

- **4-A:** Continue to educate and make residents aware of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **4-B:** Continue to educate and make realtors, bankers, and landlords aware of discriminatory housing policies and to promote fair housing opportunities for all County residents.
- **4-C:** Sponsor and participate in a “Regional Housing Summit” to discuss housing needs and approaches to achieve more affordable housing in the County.
- **4-D:** Continue to financially support the Fair Housing organizations and legal advocacy groups to assist persons who may be victims of housing discrimination and/or not aware of how to file a housing complaint.
- **4-E:** Continue to monitor the data from the Home Mortgage Disclosure Act (HMDA) to ensure that discriminatory practices in home mortgage lending not take place.

Impediment 5: Lack of Economic Opportunities - There is a lack of economic opportunities in the County for lower-income households to increase their income and thus improve their choices of housing.

Goal: Improve the job opportunities in the County, which will increase household income and make it financially feasible to live outside concentrated areas of poverty.

Strategies: In order to address the need and achieve the goal for better economic opportunities, the following activities and strategies should be undertaken:

- **5-A:** Encourage and strengthen partnerships between public and private entities to promote economic development, improve the local tax base, and create a sustainable economy.
- **5-B:** Promote and encourage the expansion of existing commercial and light industrial enterprises, which will create more employment opportunities.
- **5-C:** Provide financial and development assistance to enterprises, which will create new job opportunities and higher wages for County residents.
- **5-D:** Identify development sites for potential private investment and/or expansion of existing enterprises.
- **5-E:** Continue to improve the infrastructure to underdeveloped areas of the County to promote new development and create new job opportunities.

- **5-F:** Continue to partner with Lehigh Career & Technical Institute to develop training programs for unemployed and underemployed persons in the County.

DRAFT #3

SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Eastern PA Continuum of Care operates a Coordinated Entry System, which was piloted in the Lehigh Valley and expanded to all 33 counties of the CoC, to ensure that those at-risk of homelessness or, who are experiencing homelessness, are connected to resources and services. The system ensures the management of access, assessment, prioritization, and referral to housing and social services for any person experiencing or at imminent risk of homelessness throughout the region. A call center operated by PA 2-1-1 provides live voice intake and there are 17 access sites that provide face-to-face intake. Service providers are trained in housing first, the VI-SPDAT assessment, and other best practices to assist homeless persons in receiving proper services. The CoC conducts mobile outreach for vulnerable populations and includes ESL translation services with its intake services, as well as access for those who are hearing impaired. Coordinated Entry processes also provide information about service needs and identify gaps to help communities plan their assistance and resources.

Outreach to homeless persons is conducted by service providers. Organizations like the Lehigh County Conference of Churches will contact the homeless individuals that use the emergency shelters during weather advisory. Lehigh County Conference of Churches will also make outreach to the chronically homeless that live in communities and attempt to assess them. This outreach, combined with case management, was funded by the CoC in FY 2018.

Youth homelessness is a major problem in the Lehigh Valley Area, particularly for individuals in the 18-24 age group. It is estimated that up to 20% of the homeless people in the area fall into this age group. There is a need for a year-round shelter for this age group, as Valley Youth House does not serve youth over the age of 18. Focused outreach has been conducted by the CoC on this age group in partnership with Valley Youth House, and this population continues to be a priority for Lehigh County. The Bradbury-Sullivan LGBT Community Center partners with the Regional Homeless Advisory Board to provide housing and services to youth experiencing homelessness, as well as toiletry supplies and other products to homeless and housing-insecure LGBT youth in the Lehigh Valley. Valley Youth House is providing quarterly youth training to focus on educating providers in best practices for youth, including LGBT youth.

Addressing the emergency and transitional housing needs of homeless persons

Lehigh County addresses the housing needs of the homeless population within the County through the Lehigh Valley Regional Homeless Advisory Board's (RHAB) steering of CoC funds to various projects. In partnership with the City of Allentown, the Lehigh Valley RHAB determines the projects that most effectively assist the homeless population of Lehigh County through coalition meetings. The Lehigh Valley RHAB does not receive ESG funding.

The shelter and transitional housing that is available in Lehigh County included the following:

- Community Action Committee of the Lehigh Valley - Sixth Street Shelter (Emergency Shelter)
- Community Action Committee of the 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.

The CoC has implemented various strategies to ensure that those transitioning out of homelessness are able to procure permanent housing, which have led to a 4% increase in the transition from Emergency Shelter, Transitional Housing, and Rapid Rehousing into permanent housing during 2018. Diversion strategies have been used to place those that go through intake with the CoC into Rapid Rehousing. Many of the CoC funded transitional housing beds have been converted into Rapid Rehousing beds across the 33 county area. Rapid Rehousing providers have been trained in best practices including housing first strategy, focused case management, harm reduction, motivational interviewing, and trauma-informed care. Currently, there are 111 Rapid Rehousing beds in Lehigh County; 75 of these 111 Rapid Rehousing beds are dedicated to youth.

Rapid Rehousing programs are connected to the landlords and households with affordable units to sustain permanent housing. The CoC makes sure to focus on in-home case management and engage with landlords. Additionally, the CoC partners with mainstream service providers, such as workforce development, child care, transportation, and other resources to promote long-term stability for persons and their families that have transitioned out of homelessness. There are also 243 Permanent Supportive Housing beds dedicated to chronically homeless households.

Valley Youth House is a major provider of services for the homeless youth in the area. Valley Youth House will assist individuals that may have been in foster care. Valley Youth House receives funding for both Transitional Housing and Rapid Rehousing projects. Youth homelessness is a major problem in the Lehigh Valley area, particularly for individuals in the 18-24 age group. It is estimated that up to 20% of the homeless people in the area fall in this age group. There is a need for a year-round shelter for this age group, as Valley Youth House does not serve children over the age of 18. Focused outreach has been conducted by the CoC on this age group in partnership with Valley Youth House, and this population continues to be a priority for Lehigh County.

Turning Point of the Lehigh Valley will provide housing to victims of domestic violence and their families. They provide 32 transitional housing beds for survivors fleeing immediate abuse and will partner with other agencies to find permanent housing for victims, including Third Street Alliance, which is the major Rapid Rehousing provider for this population.

Previously, Lehigh County had a robust program to assist veterans experiencing homelessness that received SSVF funding. Because of the success of the program and the resulting lower numbers of veteran homelessness, the Federal government cut funding for the program.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The Eastern PA CoC's strategy for preventing low-income individuals and families from becoming homeless addresses the goal of increasing the economic security of households. To meet this goal, the CoC collaborates with local and statewide service providers, with Pennsylvania CareerLink® being an important partner across the entire CoC for job training and outreach to at-risk clients. Other partners provide income supports, employment and non-employment sources of income, and may address barriers to obtaining and maintaining employment for these populations.

In the Eastern PA Continuum of Care's Five-Year Strategic Plan to Reduce and End Homelessness (2017-2021), the CoC outlines the following goals and actions under "Strategy 1: Prevent and Divert Homelessness."

A. Evaluate and Improve Discharge Planning where Needed

- Evaluate current discharge planning from these systems to help stem the flow of individuals leaving institutional settings and entering homelessness because they lack stable housing options.

- Research and provide information to other systems/organizations on effective discharge planning policies/procedures for individuals and households at risk of entering homelessness upon discharge, as well as information on available housing resources.
- Engage with statewide efforts to improve discharge planning policies across systems, emphasizing the need for permanent housing placement for those exiting institutions.

B. Increase Coordination of Homeless Prevention Sources

- Assess the use of existing funding available for prevention and identify gaps.
- Coordinate funding (including ESG, HAP, PHARE) across the CoC to ensure that resources are used effectively. For example, the CoC may decide to channel prevention resources to geographic areas where emergency shelter access is limited, either due to wait lists or lack of shelter facilities.
- Investigate the use of tools, such as the Prevention VI-SPDAT, to help the CoC more effectively assess households requesting assistance.
- Ensure coordination of prevention activities with Coordinated Entry to increase the effectiveness of the system.

Furthermore, “Strategy 2” of the CoC’s Five-Year Strategy Plan focuses on the streamlining of the system and better coordination among housing and social services through the CoC’s Coordinated Entry System. Lack of resources, combined with the lack of a well-developed coordinated entry process, results in severe hardships for persons experiencing homelessness who often face long wait times to receive assistance or are screened out of needed assistance. Coordinated entry processes help communities prioritize assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner. Coordinated entry processes also provide information about service needs and identify gaps to help communities plan their assistance and resources.

Additionally, the CoC is submitting an application to the Federal Home Loan Bank of Pittsburgh and the PA Housing Finance Agency for additional resources in the implementation of housing construction for homeless prevention assistance. The CoC is targeting households that would become homeless under other circumstances with financial resources.

Lehigh County funds Catholic Charities – Self-Sufficiency & Intervention Program to assist at-risk households. This program provides counseling, short-term rental assistance, and utility payments to assist in the prevention of homelessness. In addition, at-risk persons will receive housing counseling services. Catholic Charities will also provide food for at-risk persons and families in conjunction with the Lehigh County Conference of Churches. Lehigh County, through its various human services programs, provides support to all the categories of non-homeless special needs populations. The County also funds for Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments

(PLACE) Program, which will assist at-risk disabled persons with housing location assistance and provide for fair housing workshops for landlords.

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 also provides funding for Meals on Wheels of the Greater Lehigh Valley to deliver meals to homebound seniors and adults with disabilities.

DRAFT #3

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The revised Federal lead-based paint regulations published on September 15, 1999 (24 CFR Part 35) have had a significant impact on many activities – rehabilitation, tenant-based rental assistance, and property acquisition – supported by the CDBG program. Lehigh County will comply with Title 24 Part 35: Lead-Based Paint Poisoning Prevention in Certain Residential Structures (Current Rule).

When accepting applicants for its housing rehabilitation program, Lehigh County will ensure that:

- Applicants for rehabilitation funding receive the required lead-based paint information and understand their responsibilities.
- Staff properly determines whether proposed projects are exempt from some or all lead-based paint requirements.
- The level of federal rehabilitation assistance is properly calculated and the applicable lead-based paint requirements determined.
- Properly qualified personnel perform risk management, paint testing, lead hazard reduction, and clearance services when required.
- Required lead hazard reduction work and protective measures are incorporated into project rehabilitation specifications.
- Risk assessment, paint testing, lead hazard reduction, and clearance work are performed in accordance with the applicable standards established in 24 CFR Part 35.
- Required notices regarding lead-based paint evaluation, presumption, and hazard reduction are provided to occupants and documented.
- Program documents establish the rental property owner's responsibility to perform and document ongoing lead-based paint maintenance activities, when applicable.
- Program staff monitors owner compliance with ongoing lead-based paint maintenance activities, when applicable.

How are the actions listed above related to the extent of lead poisoning and hazards?

According to the Pennsylvania 2017 Childhood Lead Surveillance Annual Report, in 2017 for the State of Pennsylvania, the rate of Childhood Lead Poisoning (percent of those tested ages 1-5 with BLLs 10 or more micrograms/deciliters) was 1.18%. In Lehigh County, 0.4% of children aged 0-71 months tested were confirmed elevated blood lead levels, and 0.22% of children aged 0-71 months tested were confirmed with lead poisoning.

How are the actions listed above integrated into housing policies and procedures?

When accepting applicants for its housing rehabilitation program, Lehigh County will ensure that:

-
- Applicants for homeownership assistance receive adequate information about lead-based paint requirements.
 - Staff properly determines whether proposed projects are exempt from some or all lead based paint requirements.
 - A proper visual assessment is performed to identify deteriorated paint in the dwelling unit, any common areas servicing the unit, and exterior surfaces of the building or soil.
 - Prior to occupancy, properly qualified personnel perform paint stabilization and the dwelling passes a clearance exam in accordance with the standards established in 24 CFR Part 35.
 - The home purchaser receives the required lead-based paint pamphlet and notices.

DRAFT #3

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Approximately 13.3% of Lehigh County's residents live in poverty, while 13.1% of the Commonwealth of Pennsylvania residents live in poverty. 27.3% of the City of Allentown's residents live in poverty. Female-headed households in the County with children are particularly affected by poverty at 36.8%.

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 (CACLTV) is the official anti-poverty agency. CACLTV 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, foreclosure mitigation counseling, child care, transportation to work for up to six (6) months and assistance in purchasing a dependable vehicle, and other various programs that empower low-income households by assisting them to develop the skills needed for independent living.

Lehigh County provides 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.

The County over the next five (5) years plans to use its CDBG funds to fund the following types of economic development and anti-poverty programs include:

- Workforce development
- Support services for new employees
- Assist in job creation and retention
- Assistance for food, shelter, and training programs
- Small businesses assistance
- Revitalization efforts
- New job opportunities
- Commercial/industrial infrastructure development
- New commercial/industrial development

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.
- Pennsylvania CareerLink® Lehigh Valley 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.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

Providing access to housing and increasing the supply of decent, safe, sound, and affordable housing is integrally tied to the County's anti-poverty strategy. Because housing is such a large portion of expenses for residents of the County, residents are not able to save or invest and work their way out of poverty. The most successful way to implement this is through job training and creation/retention activities while providing affordable housing.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Performance monitoring is an important component in the long-term success of the County's Community Development Block Grant (CDBG) 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.

DRAFT #3

Expected Resources

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

Introduction

Lehigh County is receiving \$1,216,119 from CDBG funds. The program year goes from October 1st through September 30th of each year. These funds will be used to address the following priority needs:

- Housing
- Homeless
- Other Special Needs
- Community Development
- Economic Development
- Administration, Planning, and Management

The accomplishments of these projects/activities will be reported in the FY 2019 Consolidated Annual Performance and Evaluation Report (CAPER).

CARES Act Substantial Amendments:

The following financial resources are identified for the FY 2019 Annual Action Plan – Substantial Amendment to address the priority needs and goals/strategies identified in Lehigh County's Five Year Consolidated Plan using the CARES Act funds.

The County will receive two (2) allocations of the Community Development Block Grant - Coronavirus (CDBG-CV) funds. The first allocation received by the County was \$757,860 and in the third round of funding, the County received an allocation of \$1,267,910 for a total allocation of \$2,025,770 CDBG-CV funds.

Anticipated Resources

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	\$1,216,119.00	\$0.00	\$0.00	\$1,216,119.00	\$4,286,067.00	Five Years of funding at a reduction level each year of 5%. 16 projects/activities were funded based on FY 2019 CDBG allocations.
Other: CDBG-CV	public - federal	Admin and Planning Public Services Other	\$2,025,770.00	\$0.00	\$0.00	\$2,025,770.00	\$0.00	CDBG-CV funds to be used to prevent, prepare for, and respond to the coronavirus.

Table 52 - Expected Resources – Priority Table

In addition to the entitlement funds, Lehigh County anticipates the following Federal resources may be available to local non-profit organizations to undertake the housing strategies identified in the Five Year Consolidated Plan.

- Supportive Housing Program
- Low-Income Housing Tax Credit Program (LIHTC)
- Section 8 Rental Assistance Program
- Shelter Plus Care

- Section 8 Moderate Rehabilitation Program for Single Room Occupancy (SRO)
- Public Housing Development

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 (Act 137), 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. Lehigh County has recommended allocating \$574,736 for FY 2019 from the Affordable Housing Trust Fund to allow the funds to grow and be used for future projects.
- **HOME Investment Partnership** - Lehigh County will be receiving HOME funds from the Commonwealth of Pennsylvania's Department of Community and Economic Development. The County will receive \$500,000 in HOME funds in FY 2019.
- **Continuum of Care Grant** - Lehigh County is part of the Lehigh Valley Regional Housing Advisory Board. This is a two (2) county region that applies for Continuum of Care funds each year. In FY 2018, the Lehigh Valley received funding for thirteen (13) projects totaling \$2,466,453.00 for support services and permanent supportive housing projects throughout the region. Of the thirteen (13) projects funded, twelve (12) were Tier 1 awards, and one (1) was a Tier 2 award. HUD will contract with these agencies during the FY 2018 program year.
- **The Lehigh County Housing Authority** - Expects to receive \$506,299.00 in FY 2019 funds from the Public Housing Capital Fund Program, as well as Public Housing Operating funds and Section 8 Housing Choice Voucher assistance.
- **Emergency Solutions Grant (ESG) Funds** - Lehigh County will apply for ESG grants from the Pennsylvania Department of Community and Economic Development during FY 2019.
- Other federal funds that may be used in support of housing, community development, and economic development during FY 2019 include loans through HUD's Section 108 Loan Program, Brownfields Economic Development Initiative (BEDI) grants, and 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. The County has not acquired or improved any land, property, or buildings that are available for sale with CDBG funds.

Discussion

Not applicable.

DRAFT #3

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HSS-3 Housing Rehabilitation	2019	2023	Affordable Housing	County Wide	Housing Priority	CDBG: \$200,000	Homeowner Housing Rehabilitated: 3 Household Housing Unit
2	HSS-6 Fair Housing	2019	2023	Affordable Housing	County Wide	Housing Priority	CDBG: \$10,000	Public service activities for Low/Moderate Income Housing Benefit: 40 Households Assisted Other: 1 Other
3	HOM-1 Housing	2019	2023	Homeless	County Wide	Homeless Priority	CDBG: \$29,700	Public service activities for Low/Moderate Income Housing Benefit: 30 Households Assisted
4	CDS-1 Community Facilities	2019	2023	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$98,085	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4265 Persons Assisted Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	CDS-2 Infrastructure	2019	2023	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$374,894	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3290 Persons Assisted Other: 2 Other
6	CDS-3 Public Services	2019	2023	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$100,562	Public service activities other than Low/Moderate Income Housing Benefit: 201 Persons Assisted
7	CDS-4 Accessibility	2019	2023	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$159,700	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 6440 Persons Assisted Other: 3 Other
8	APM-1 Coordination	2019	2023	Non-Housing Community Development administrative management	County Wide	Administration, Planning, and Management Priority	CDBG: \$243,220	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	APM-2 Planning	2019	2023	Non-Housing Community Development administrative management	County Wide	Administration, Planning, and Management Priority	CDBG: \$0	Other: 1 Other

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	HSS-3 Housing Rehabilitation
	Goal Description	Promote and assist in the preservation of existing owner and renter occupied housing stock in the County.
2	Goal Name	HSS-6 Fair Housing
	Goal Description	Affirmatively further fair housing by promoting fair housing choice throughout Lehigh County.
3	Goal Name	HOM-1 Housing
	Goal Description	Promote and assist in developing housing opportunities for homeless persons, families, and those who are at-risk of becoming homeless.
4	Goal Name	CDS-1 Community Facilities
	Goal Description	Assist in improving parks, recreational centers, trails, libraries, and other public and community facilities throughout the County.
5	Goal Name	CDS-2 Infrastructure
	Goal Description	Assist in improving the public infrastructure through rehabilitation, reconstruction, and new construction.

6	Goal Name	CDS-3 Public Services
	Goal Description	Assist in improving and increasing public safety, municipal services, and public service and human service programs throughout Lehigh County.
7	Goal Name	CDS-4 Accessibility
	Goal Description	Assist in improving the physical and visual accessibility of community facilities, infrastructure, and public buildings throughout the County.
8	Goal Name	APM-1 Coordination
	Goal Description	Continue to provide sound and professional planning, program management and oversight for the successful administration of Federal, state, and local funded programs.
9	Goal Name	APM-2 Planning
	Goal Description	Continue to develop and plan for special studies, environmental clearance, fair housing, and compliance with all Federal, state, and local laws and regulations.

Projects

AP-35 Projects – 91.220(d)

Introduction

List below are the FY 2019 CDBG and FY 2020 CDBG-CV Activities for Lehigh County:

Projects

#	Project Name	Budget
1.	Catholic Charities - Self-Sufficiency & Intervention Program	\$ 29,700.00
2.	Communities in Schools of the Lehigh Valley - Career Supports at LCTI	\$ 25,000.00
3.	County of Lehigh - County-Wide Housing Rehabilitation Program (CWHR)	\$ 200,000.00
4.	Emmaus Borough - Curb Cuts / Accessibility	\$ 34,700.00
5.	Fountain Hill Borough - Street Reconstruction	\$ 284,050.00
6.	Lehigh Carbon Community College Foundation - ESL for Communication Success	\$ 6,000.00
7.	Lehigh Career & Technical Institute - Scholarships for Low-Income Residents	\$ 19,500.00
8.	Lehigh Valley Center for Independent Living – People Living in Accessible Community Environments (PLACE)	\$ 15,062.00
9.	Macungie Borough - Curb Cuts / Accessibility	\$ 11,600.00
10.	Meals on Wheels - Meal Preparation and Delivery	\$ 20,000.00
11.	North Penn Legal Services - LMI Legal Aid Help	\$ 10,000.00
12.	Salisbury Township - Sanitary Sewer Rehabilitation	\$ 90,799.00
13.	Slatington Borough - Memorial Park	\$ 98,085.00
14.	The Literacy Center - ESL & ABE Courses	\$ 15,000.00
15.	Whitehall Township - Curb Cuts / Accessibility	\$ 113,400.00
16.	Administration	\$ 243,223.00

17.	CV - Catholic Charities - Rent Conciliation Program	\$118,500.00
18.	CV - CACLV - CAFS - Foreclosure Assistance	\$15,000.00
19.	CV - CACLV - Sixth Street Shelter	\$50,000.00
20.	CV - Conference of Churches - Rental Assistance Program	\$105,480.00
21.	CV - LCTI - COVID Scholarships	\$60,000.00
22.	CV - Literacy Center - Workforce Development Online Education	\$30,000.00
23.	CV - Administration	\$91,705.00
24.	CV - Technology Adaptations	\$62,385.70
25.	CV - Food Security	\$700,000.00
26.	CV - Housing Stabilization	\$672,699.30
27.	CV-COVID Support Program	\$120,000.00

Table 54 – Project Information**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

Lehigh County has allocated its FY 2019 CDBG funds to principally benefit low- and moderate-income persons.

- The infrastructure improvement activities are either located in a low- and moderate-income census tract/block group or have a low- and moderate-income service area benefit or clientele over 51% low- and moderate-income.
- The Public Services activities are either located in a low- and moderate-income census area or have a low- and moderate-income services area benefit or clientele.
- The Public Facilities activities are either located in a low- and moderate-income census area or have a low- and moderate-income service area benefit or clientele.
- Demolition of structures that are either located in a low- and moderate-income census area, or fall under removal of slum and blight on a spot basis.
- The housing activities for the first time homebuyers and housing rehabilitation program have an income eligibility criteria, therefore the income requirement restricts funds to low- and moderate-income households throughout the County.
- Economic development projects will either be located in a low- and moderate-income census tract/block group, or a poverty tract greater than 20%, or part of a

redevelopment plan, or making 51% of the jobs available to low- and moderate-income population.

The proposed activities and projects for FY 2019 are located in areas of the County with the highest percentages of low- and moderate-income persons, and those block groups with a higher than average percentage of minority persons. The following census tracts and block groups have at least 51% of the households with low- and moderate-incomes:

- C.T. 1900, B.G. 1 – South Whitehall Township
- C.T. 5100, B.G. 3 – Slatington Borough
- C.T. 5100, B.G. 4 – Slatington Borough
- C.T. 5702, B.G. 2 – Whitehall Township
- C.T. 5702, B.G. 3 – Whitehall Township
- C.T. 5703, B.G. 3 – Whitehall Township
- C.T. 5704, B.G. 1 – Whitehall Township
- C.T. 5800, B.G. 1 – Coplay Borough
- C.T. 5901, B.G. 4 – Catasauqua Borough
- C.T. 5901, B.G. 5 – Catasauqua Borough
- C.T. 6001, B.G. 2 – South Whitehall Township
- C.T. 6101, B.G. 1 – South Whitehall Township
- C.T. 6800, B.G. 1 – Fountain Hill Borough
- C.T. 6800, B.G. 4 – Fountain Hill Borough

Additionally, because Lehigh County is an exception grantee and all Census Tracts where at least 39.01% of households with low- and moderate-incomes are CDBG eligible, the following Census Tracts and Block Groups are eligible:

- C.T. 5100, B.G. 2 – Slatington Borough (47.57% LMI)
- C.T. 5200, B.G. 3 – Washington Township (44.52% LMI)
- C.T. 5601, B.G. 1 – Whitehall Township (43.24% LMI)
- C.T. 5602, B.G. 4 – Whitehall Township (43.41% LMI)
- C.T. 5702, B.G. 1 – Whitehall Township (49.31% LMI)
- C.T. 5704, B.G. 2 – Whitehall Township (43.46% LMI)
- C.T. 5800, B.G. 3 – Coplay Borough (50.39% LMI)
- C.T. 5901, B.G. 3 – Catasauqua Borough (41.35% LMI)
- C.T. 5902, B.G. 1 – Hanover Township (42.22% LMI)
- C.T. 6001, B.G. 3 – South Whitehall Township (44.62% LMI)
- C.T. 6001, B.G. 5 – South Whitehall Township (41.46% LMI)
- C.T. 6101, B.G. 3 – South Whitehall Township (46.80% LMI)
- C.T. 6202, B.G. 2 – Upper Macungie Township (44.80% LMI)
- C.T. 6202, B.G. 3 – Upper Macungie Township (40.70% LMI)

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- C.T. 6303, B.G. 3 – Macungie Borough (40.51% LMI)
 - C.T. 6500, B.G. 2 – Emmaus Borough (50.00% LMI)
 - C.T. 6500, B.G. 3 – Emmaus Borough (47.89% LMI)
 - C.T. 6701, B.G. 2 – Salisbury Township (40.12% LMI)
 - C.T. 6702, B.G. 2 – Salisbury Township (39.01% LMI)
 - C.T. 6703, B.G. 3 – Salisbury Township (43.81% LMI)
 - C.T. 6902, B.G. 2 – Coopersburg Borough & Upper Saucon Township (43.95% LMI)

DRAFT #3

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

1.	Project Name	Catholic Charities – Self-Sufficiency & Intervention Program
	Target Area	County wide
	Goals Supported	HOM-1 Housing CDS-3 Public Services
	Needs Addressed	Homeless Strategy – HOM Community Development Strategy – CDS
	Funding	CDBG: \$29,700.00
	Description	Funds provide case management services and rent and utility assistance to eligible, low-income families in Lehigh County.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	30 households.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 900 South Woodward Street, Allentown, PA 18103
	Planned Activities	The Regulatory Citation is Public Services 570.201 (e) The Matrix Code is 05Q, Subsistence Payments The National Objective is Low/Mod Clientele Benefit, 570.208(a)(2)(i)(B)
2.	Project Name	Communities in Schools of the Lehigh Valley – Career Supports at LCTI
	Target Area	County wide
	Goals Supported	CDS-3 Public Services
	Needs Addressed	Community Development Strategy – CDS
	Funding	CDBG: \$25,000.00
	Description	Communities in Schools Career Supports at LCTI will target at-risk students who require truancy interventions and additional case managed support to overcome challenges while supporting marketable skill development.
	Target Date	9/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	20 persons.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 739 North 12th Street, Allentown, PA 18102
	Planned Activities	The Regulatory Citation is Public Services 570.201 (e) The project matrix code is 05D, Youth Services The National Objective is Low/Mod Clientele (LMC), 570.208(a)(2)(i)(B)
3.	Project Name	County of Lehigh – County-Wide Housing Rehabilitation Program (CWHR)
	Target Area	County wide
	Goals Supported	HSS-3 Housing Rehabilitation
	Needs Addressed	Housing Strategy – HSS
	Funding	CDBG: \$200,000.00
	Description	Funds will be used to rehabilitate owner-occupied LMI properties. Program delivery is also included.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	3 housing units
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem. 17 South Seventh Street, Allentown, PA 18101.
	Planned Activities	The Regulatory Citation is Rehabilitation, Single-Unit Residential, 570.202(a)(1) The Project Matrix Code is 14A, Rehabilitation (Single-Unit Residential) The National Objective is Low/Mod Housing, 570.208(a)(3)
4.	Project Name	Emmaus Borough – Curb Cuts
	Target Area	County wide
	Goals Supported	CDS-4 Accessibility
	Needs Addressed	Community Development Strategy – CDS
	Funding	CDBG: \$34,700.00

	Description	Removal of architectural barriers in the public rights-of-way by installing curb cuts and ramps, which meet ADA handicap accessibility requirements. The Borough will install approximately 23 curb cuts.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	1,817 disabled persons
	Location Description	George Street and Keystone Avenue; George Street and North 1st Street; Ridge Street and Perkiomen Street; South 6th Street and Furnace Street; South 6th Street and Wood Street; and South 6th Street and Fairview Street, Emmaus, PA 18049
	Planned Activities	The Regulatory Citation is Public Facilities & Improvements (General), 570.201(c) The Project Matrix Code is 03B, Facilities for Persons with Disabilities The National Objective is Low/Mod Limited Clientele (LMC), 570.208(a)(2)(ii)(A)
5.	Project Name	Fountain Hill Borough – Street Reconstruction
	Target Area	County wide
	Goals Supported	CDS-2 Infrastructure
	Needs Addressed	Community Development Strategy – CDS
	Funding	CDBG: \$284,050.00
	Description	Project consists of the full depth reconstruction of portions of two Borough Streets: Stanley Avenue from Bergen Street east to North Hoffert, and North Hoffert Street from Stanley Avenue north to Jeter Avenue.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Stanley Avenue and North Hoffert Streets serve a Low-Moderate Income (LMI) area, with 2,035 people served, and 1,125 at or below 80% of median income.
	Location Description	Stanley Avenue and N. Hoffert Street; C.T. 6800, B.G. 2 & B.G. 4
	Planned Activities	The Regulatory Citation is Public Facilities & Improvements (General), 570.201(c) The Project Matrix Code is 03K, Street Improvements The National Objective is Low/Mod Area Benefit (LMA), 570.208(a)(1)

6.	Project Name	Lehigh Carbon Community College Foundation – ESL for Communication Success
	Target Area	County wide
	Goals Supported	CDS-3 Public Services
	Needs Addressed	Community Development Strategy – CDS
	Funding	CDBG: \$6,000.00
	Description	Lehigh Carbon Community College will offer an English as a Second Language class at Whitehall High School for low-income residents of Whitehall and Coplay.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	30 low-moderate income persons
	Location Description	Residents of Whitehall Township and Coplay Borough; Whitehall High School, 3800 Mechanicsville Road, Whitehall, PA 18052
7.	Project Name	Lehigh Career & Technical Institute – Scholarships for Low-Income Residents
	Target Area	County wide
	Goals Supported	CDS-3 Public Services
	Needs Addressed	Community Development Strategy – CDS
	Funding	CDBG: \$19,500.00
	Description	Lehigh Career & Technical Institute (LCTI) proposes to provide four (4) scholarships for LMI individuals to attain a CDL-A and/or HEO certification.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Four (4) persons.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 4500 Education Park Drive, Schnecksville, PA 18079.

	Planned Activities	The Regulatory Citation is Public Services, 570.201(e) The Matrix Code is 05H, Employment Training (Public Services) The National Objective is Low/Mod Clientele (LMC), 570.208(a)(2)(i)(B)
8.	Project Name	Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program
	Target Area	County wide
	Goals Supported	CDS-3 Public Services
	Needs Addressed	Community Development Strategy – CDS
	Funding	CDBG: \$15,062.00
	Description	Funding to provide housing location assistance to 42 disabled low- and moderate-income Lehigh County households in avoiding becoming homeless. Additionally, funding to be provided for fair housing workshops for landlords.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	42 households
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 713 N. 13th Street, Allentown, PA 18102
	Planned Activities	The Regulatory Citation is Public Services, 570.201(e) The Matrix Code is 05B, Handicapped Services (Public Services) The National Objective is Low/Mod Limited Clientele, 507.208(a)(2)(i)(A)
9.	Project Name	Macungie Borough – Curb Cuts
	Target Area	County wide
	Goals Supported	CDS-4 Accessibility
	Needs Addressed	Community Development Strategy – CDS
	Funding	CDBG: \$11,600.00
	Description	Construction costs to install sixteen (16) ADA compliant ramps on S. Church Street from Main Street to Spruce Street in advance of the S. Church Street Reconstruction Project in 2021.
	Target Date	9/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	381 disabled persons
	Location Description	S. Church Street, Macungie, PA 18062; C.T. 6303, B.G. 3
	Planned Activities	The Regulatory Citation is Public Facilities & Improvements (General), 570.201(c) The Project Matrix Code is 03B, Facilities for Persons with Disabilities The National Objective is Low/Mod Limited Clientele (LMC), 570.208(a)(2)(ii)(A)
10.	Project Name	Meals on Wheels – Meal Preparation and Delivery
	Target Area	County wide
	Goals Supported	CDS-3 Public Services
	Needs Addressed	Community Development Strategy – CDS
	Funding	CDBG: \$20,000.00
	Description	Funds will be used to subsidize meals for elderly and disabled households through the purchase of supplies and prepared food. Volunteers will deliver one or two meals to homebound seniors and adults with disabilities who meet project criteria.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	75 persons
	Location Description	County-Wide, excluding the cities of Allentown and Bethlehem; 4234 Dorney Park Road, Allentown, PA 18104
	Planned Activities	The Regulatory Citation is Public Services, 570.201(e) The Matrix Code is 05A, Senior Services The National Objective is Low/Mod Limited Clientele, 507.208(a)(2)(i)(A)
11.	Project Name	North Penn Legal Services – LMI Legal Help
	Target Area	County wide
	Goals Supported	HSS-6 Fair Housing CDS-3 Public Services
	Needs Addressed	Housing Strategy – HSS Community Development Strategy – CDS
	Funding	CDBG: \$10,000.00

	Description	NPLS will provide advice, referrals, advocacy, and other housing-related legal aide to 40 low- and moderate-income people, as well as one (1) Fair Housing outreach session.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	40 persons 1 other
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 559 Main Street, Suite 100, Bethlehem, PA 18018
	Planned Activities	The Regulatory Citation is Public Services (General), 570.201(e) The Matrix Code is 05C, Legal Services The National Objective is Low/Mod Limited Clientele, 570.208(a)(2)(i)(B)
12.	Project Name	Salisbury Township – Sanitary Sewer Rehabilitation
	Target Area	County wide
	Goals Supported	CDS-2 Infrastructure
	Needs Addressed	Community Development Strategy – CDS
	Funding	CDBG: \$90,799.00
	Description	The Township proposes to use CDBG funds in census block group 006701, 3 to perform sanitary sewer rehabilitation and repairs in an effort to comply with an EPA Administrative Order.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	1,255 people served; 570 at or below 80% of median income.
	Location Description	Emmaus Avenue, Paxford Road, and the easement south along the Harry S. Truman Elementary School, Allentown, PA 18103; C.T. 6701, B.G. 3
	Planned Activities	The Regulatory Citation is Public Facilities & Improvements (General), 570.201(c) The Matrix Code is 03J, Water/Sewer Improvements The National Objective is Low/Mod Limited Clientele, 570.208(a)(2)(ii)(A)
13.	Project Name	Slatington Borough – Memorial Park
	Target Area	County wide
	Goals Supported	CDS-1 Community Facilities

	Needs Addressed	Community Development Strategy – CDS
	Funding	CDBG: \$98,085.00
	Description	Installation of lighting, addition of street parking along the north side of Kuntz Street, including ADA compliant parking spaces, addition of sidewalks, and replacement of ADA accessible curb ramps to make an accessible route to the public park.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	4,265 people served; 1,945 at or below 80% of median income.
	Location Description	443 Main Street, Slatington, PA 18080; C.T. 5100, B.G. 2
	Planned Activities	The Regulatory Citation is Public Facilities & Improvements (General), 570.201(c) The Matrix Code is 03F, Parks, Recreational Facilities The National Objective is Low/Mod Income Area Benefit (LMA), 570.208(a)(1)(i)
14.	Project Name	The Literacy Center – ESL & ABE Courses
	Target Area	County wide
	Goals Supported	CDS-3 Public Services
	Needs Addressed	Community Development Strategy – CDS
	Funding	CDBG: \$15,000.00
	Description	Funding to prepare 30 Lehigh County adults to successfully pursue their professional and educational goals through literacy instruction.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The project will assist thirty (30) low- and moderate-income persons.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 1132 West Hamilton Street, Suite 300, Allentown, PA 18101
	Planned Activities	The Regulatory Citation is Public Services, 570.201(e) The Matrix Code is 05H, Employment Training The National Objective is Low/Mod Limited Clientele, 570.208(a)(2)(i)(B)
15.	Project Name	Whitehall Township – Curb Cuts

	Target Area	County wide
	Goals Supported	CDS-4 Accessibility
	Needs Addressed	Community Development Strategy – CDS
	Funding	CDBG: \$113,400.00
	Description	Installation of sixty-two (62) ADA curb ramps at various locations throughout the Township to improve handicap accessibility.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	4,242 disabled persons
	Location Description	Specific intersections TBD; Whitehall Township, PA
	Planned Activities	The Regulatory Citation is Public Facilities & Improvements (General), 570.201(c) The Project Matrix Code is 03B, Facilities for Persons with Disabilities The National Objective is Low/Mod Limited Clientele (LMC), 570.208(a)(2)(ii)(A)
16.	Project Name	Administration
	Target Area	County wide
	Goals Supported	APM-1 Coordination APM-2 Planning
	Needs Addressed	Administration, Planning, and Management Strategy – APM
	Funding	CDBG: \$243,223.00
	Description	Funds for oversight, management, and administration of the CDBG Program.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	46,195 low- and moderate-income persons and 1 organization.
	Location Description	County-Wide; 17 South Seventh Street, Allentown, PA 18101
17	Planned Activities	The Regulatory Citation is General Program Administration, 570.206 The Matrix Code is 21A, General Program Administration
	Project Name	CV - Catholic Charities - Rent Conciliation Program

	Target Area	County Wide
	Goals Supported	HOM-3 Homeless Prevention
	Needs Addressed	Housing Priority
	Funding	CDBG-CV: \$118,500.00
	Description	A program to stay eviction proceedings for renters who are on the verge of being evicted due to lack of income from COVID-19.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	The goal is to assist 30 households on the verge of becoming homeless.
	Location Description	Project will assist households living throughout Lehigh County, outside the cities of Allentown and Bethlehem.
	Planned Activities	Case management of households receiving financial assistance. Financial assistance includes monthly rent not to exceed 3 months.
18	Project Name	CV - CACLV - CAFS - Foreclosure Assistance
	Target Area	County Wide
	Goals Supported	HOM-3 Homeless Prevention
	Needs Addressed	Homeless Priority
	Funding	CDBG-CV: \$15,000.00
	Description	Foreclosure mitigation counseling for households impacted by COVID-19.
	Target Date	9/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	At least 37 households outside of the cities of Allentown and Bethlehem will be counseled to avoid foreclosure as a result of the impact of the pandemic.
	Location Description	County-wide but outside of the cities of Allentown and Bethlehem.
	Planned Activities	Foreclosure mitigation counseling which diverts households from direct foreclosure through conciliation in civil court with the attempt to waive the foreclosure and retain ownership.
19	Project Name	CV - CACLV - Sixth Street Shelter

	Target Area	County Wide
	Goals Supported	HOM-1 Housing
	Needs Addressed	Homeless Priority
	Funding	CDBG-CV: \$50,000.00
	Description	Assistance to families impacted by COVID-19 which are leaving the shelter with up to 3 months of rental assistance for apartments located in eligible areas of Lehigh County.
	Target Date	9/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	At least 10 low-income households will benefit from the activity.
	Location Description	Households moving into apartments located outside the cities of Allentown and Bethlehem.
	Planned Activities	Up to 3 months of rental assistance as well as case management to assist in housing and financial stability.
20	Project Name	CV - Conference of Churches - Rental Assistance Program
	Target Area	County Wide
	Goals Supported	HOM-3 Homeless Prevention
	Needs Addressed	Homeless Priority
	Funding	CDBG-CV: \$105,480.00
	Description	Short-term rental assistance to avoid eviction for households living in eligible areas of Lehigh County.
	Target Date	9/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated that 30 homeless households, and also those on the verge of homelessness, will be assisted under this program.
	Location Description	Households living within Lehigh County but outside the cities of Allentown and Bethlehem will be able to be assisted.
21	Planned Activities	The CDBG costs include rental assistance up to 3 months. The Grantee will cover housing case management for CDBG-assisted households.
	Project Name	CV - LCTI - COVID Scholarships

	Target Area	County Wide
	Goals Supported	EDS-1 Employment
	Needs Addressed	Economic Development Priority
	Funding	CDBG-CV: \$60,000.00
	Description	Scholarships for households impacted by job loss due to COVID-19. Short-term training options in high demand fields leading to industry certifications and immediate job placements at sustainable wages.
	Target Date	9/1/2023
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 30 households experiencing COVID-19 job loss will be impacted by the scholarship program.
	Location Description	Households eligible for scholarships will live within Lehigh County but outside the cities of Allentown and Bethlehem.
	Planned Activities	The provision of scholarships to retrain in one of Lehigh County Technical Institute's manufacturing, transportation, or construction program options, leading to industry certifications and immediate job placement at sustainable wages.
22	Project Name	CV - Literacy Center - Workforce Development Online Education
	Target Area	County Wide
	Goals Supported	EDS-1 Employment
	Needs Addressed	Economic Development Priority
	Funding	CDBG-CV: \$30,000.00
	Description	Online classes to combat unemployment caused by COVID.
	Target Date	9/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 60 households impacted by COVID-19 will benefit from online literacy instruction.
	Location Description	Eligible households living within Lehigh County but outside the cities of Allentown and Bethlehem.
	Planned Activities	Online literacy and workplace skills training for households impacted by COVID-19.

24	Project Name	CV - Administration
	Target Area	County Wide
	Goals Supported	APM-1 Coordination
	Needs Addressed	Administration, Planning, and Management Priority
	Funding	CDBG-CV: \$91,705.00
	Description	Program administration related to CDBG-CV projects.
	Target Date	9/1/2023
	Estimate the number and type of families that will benefit from the proposed activities	46,195 low- and moderate-income persons and 1 organization.
	Location Description	County-Wide; 17 South Seventh Street, Allentown, PA 18101
	Planned Activities	
25	Project Name	CV - Technology Adaptations
	Target Area	County Wide
	Goals Supported	CDS-3 Public Services
	Needs Addressed	Community Development Priority
	Funding	CDBG-CV: \$62,385.70
	Description	Funding for the purchase and implementation of technology to address alternative service delivery needs due to COVID-19.
	Target Date	9/1/2023
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 100 low-income families will benefit from the proposed activities.
	Location Description	
	Planned Activities	
26	Project Name	CV - Food Security
	Target Area	County Wide
	Goals Supported	CDS-3 Public Services
	Needs Addressed	Community Development Priority

	Funding	CDBG-CV: \$700,000.00
	Description	Funding towards the purchase, storage, and distribution of food to banks and pantries.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 600 unduplicated, low-income households will benefit from the proposed activities.
	Location Description	County-wide, except for Allentown and Bethlehem
	Planned Activities	Purchase and distribution of food and sanitary care items, as well as supplies necessary to manage programs.
28	Project Name	CV - Housing Stabilization
	Target Area	County Wide
	Goals Supported	County Wide
	Needs Addressed	CDS-3 Public Services
	Funding	CDBG-CV: \$672,699.30
	Description	Subsistence payments, income generation, as well as COVID health information services to help stabilize households in crisis and/or at risk for homelessness due to COVID.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 100 low-income families will benefit from the proposed activities.
	Location Description	County-wide, excluding Allentown and Bethlehem.
	Planned Activities	Funding for security deposits, six months of rental, mortgage, and utility payments, mortgage arrears, case management, emergency expenses, counseling for job and education opportunities, COVID-related health information, and housing search.
29	Project Name	CV - COVID Support Program
	Target Area	County Wide
	Goals Supported	CDS-3 Public Services
	Needs Addressed	Community Development Priority

Funding	CDBG-CV: \$120,000.00
Description	Funding for projects offering health and service related information and support to households impacted by COVID-19.
Target Date	9/30/2023
Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 56 low-income persons will benefit from the proposed activities.
Location Description	County-wide, excluding Allentown and Bethlehem.
Planned Activities	

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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

Lehigh County undertakes projects using CDBG funds in Low- and Moderate-Income areas of the County. Many of the Boroughs in the County have high Low- and Moderate-Income populations, and projects are frequently targeted to these areas. Additionally, Lehigh County is an exception grantee where at least 39.01% of households with low- and moderate-incomes are CDBG eligible. There are no racially or ethnically concentrated areas of poverty within Lehigh County's CDBG jurisdiction.

Geographic Distribution

Target Area	Percentage of Funds
County wide	100%

Table 55 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The proposed activities and projects for FY 2019 are located in areas of the County with the highest percentages of low- and moderate-income persons, and those block groups with a higher than average percentage of minority persons. The following census tracts and block groups have at least 51% of the households with low- and moderate-incomes:

- C.T. 1900, B.G. 1 – South Whitehall Township
- C.T. 5100, B.G. 3 – Slatington Borough
- C.T. 5100, B.G. 4 – Slatington Borough
- C.T. 5702, B.G. 2 – Whitehall Township
- C.T. 5702, B.G. 3 – Whitehall Township
- C.T. 5703, B.G. 3 – Whitehall Township
- C.T. 5704, B.G. 1 – Whitehall Township
- C.T. 5800, B.G. 1 – Coplay Borough
- C.T. 5901, B.G. 4 – Catasauqua Borough
- C.T. 5901, B.G. 5 – Catasauqua Borough
- C.T. 6001, B.G. 2 – South Whitehall Township
- C.T. 6101, B.G. 1 – South Whitehall Township
- C.T. 6800, B.G. 1 – Fountain Hill Borough
- C.T. 6800, B.G. 4 – Fountain Hill Borough

Additionally, because Lehigh County is an exception grantee and all Census Tracts where at least 39.01% of households with low- and moderate-incomes are CDBG eligible, the following Census Tracts and Block Groups are eligible:

- C.T. 5100, B.G. 2 – Slatington Borough (47.57% LMI)
- C.T. 5200, B.G. 3 – Washington Township (44.52% LMI)
- C.T. 5601, B.G. 1 – Whitehall Township (43.24% LMI)
- C.T. 5602, B.G. 4 – Whitehall Township (43.41% LMI)
- C.T. 5702, B.G. 1 – Whitehall Township (49.31% LMI)
- C.T. 5704, B.G. 2 – Whitehall Township (43.46% LMI)
- C.T. 5800, B.G. 3 – Coplay Borough (50.39% LMI)
- C.T. 5901, B.G. 3 – Catasauqua Borough (41.35% LMI)
- C.T. 5902, B.G. 1 – Hanover Township (42.22% LMI)
- C.T. 6001, B.G. 3 – South Whitehall Township (44.62% LMI)
- C.T. 6001, B.G. 5 – South Whitehall Township (41.46% LMI)
- C.T. 6101, B.G. 3 – South Whitehall Township (46.80% LMI)
- C.T. 6202, B.G. 2 – Upper Macungie Township (44.80% LMI)
- C.T. 6202, B.G. 3 – Upper Macungie Township (40.70% LMI)
- C.T. 6303, B.G. 3 – Macungie Borough (40.51% LMI)
- C.T. 6500, B.G. 2 – Emmaus Borough (50.00% LMI)
- C.T. 6500, B.G. 3 – Emmaus Borough (47.89% LMI)
- C.T. 6701, B.G. 2 – Salisbury Township (40.12% LMI)
- C.T. 6702, B.G. 2 – Salisbury Township (39.01% LMI)
- C.T. 6703, B.G. 3 – Salisbury Township (43.81% LMI)
- C.T. 6902, B.G. 2 – Coopersburg Borough & Upper Saucon Township (43.95% LMI)

Discussion

The geographic locations and the public benefit for the FY 2019 CDBG Activities/Projects are as follows:

- **Catholic Charities – Self-Sufficiency & Intervention Program** – County-wide, excluding the cities of Allentown and Bethlehem; 900 South Woodward Street, Allentown, PA 18103; Low/Mod Clientele (LMC).
- **Communities in Schools of the Lehigh Valley – Career Supports at LCTI** – County-wide, excluding the cities of Allentown and Bethlehem; 739 North 12th Street, Allentown, PA 18102; Low/Mod Clientele (LMC).
- **County of Lehigh – County-wide Housing Rehabilitation Program (CWHR)** – County-wide, excluding the cities of Allentown and Bethlehem; 17 South Seventh Street, Allentown, PA 18101; Low/Mod Housing (LMH).
- **Emmaus Borough – Curb Cuts** – TBD throughout Emmaus Borough, PA; C.T. 6401, B.G. 1; C.T. 6500, B.G. 1, 2, 3, 4, & 5; C.T. 6600, B.G. 1, 2, 3, 4, & 5; Low/Mod Clientele (LMC).
- **Fountain Hill Borough – Street Reconstruction** – Stanley Avenue and North Hoffert Street, Fountain Hill, PA 18104; C.T. 6800, B.G. 2 & 4; Low/Mod Income Area Benefit (LMA).

- **Lehigh Carbon Community College Foundation – ESL for Communication Success** – Whitehall Township and Coplay Borough; 3800 Mechanicsville Road, Whitehall, PA 18052; Low/Mod Clientele (LMC).
- **Lehigh Career & Technical Institute – Scholarships for Low-Income Residents** – County-wide, excluding the cities of Allentown and Bethlehem; 4500 Education Park Drive, Schnecksville, PA 18078; Low/Mod Clientele (LMC).
- **Lehigh Valley Center for Independent Living – People Living in Accessible Community Environments (PLACE)** – County-wide, excluding the cities of Allentown and Bethlehem; 713 N. 13th Street, Allentown, PA 18102; Low/Mod Clientele (LMC).
- **Macungie Borough – Curb Cuts** – Church Street, Macungie, PA 18062; C.T. 6303, B.G. 3; Low/Mod Clientele (LMC).
- **Meals on Wheels – Meal Prep and Delivery** – County-wide, excluding the cities of Allentown and Bethlehem; 4234 Dorney Park Road, Allentown, PA 18104; Low/Mod Clientele (LMC).
- **North Penn Legal Services – LMI Legal Aid Help** – County-wide, excluding the cities of Allentown and Bethlehem; Low/Mod Clientele (LMC).
- **Salisbury Township – Sanitary Sewer Rehabilitation** – Emmaus Avenue, Paxford Road, and easement along the Harry S. Truman Elementary School, Allentown, PA 18103; C.T. 6701, B.G. 3; Low/Mod Area Benefit (LMA).
- **Slatington Borough – Memorial Park** – 443 Main Street, Slatington, PA 18080; C.T. 5100, B.G. 2; Low/Mod Area Benefit (LMA).
- **The Literacy Center – ESL & ABE Courses** – County-wide, excluding the cities of Allentown and Bethlehem; 1132 West Hamilton Street, Suite 300, Allentown, PA 18101; Low/Mod Clientele (LMC).
- **Whitehall Township – Curb Cuts** – TBD throughout Whitehall Township, PA; C.T. 5702, B.G. 1, 2, & 3; C.T. 5703, B.G. 1, 2, & 3; C.T. 5704, B.G. 1, & 2; C.T. 5705, B.G. 1, 2, & 3; C.T. 5601, B.G. 1, 2, 3, & 4; C.T. 5602, B.G. 1, 2, 3, & 4; Low/Mod Clientele (LMC).
- **Administration** – County-wide; 17 South Seventh Street, Allentown, PA 18101.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

One Year Goals for the Number of Households to be Supported	
Homeless	30
Non-Homeless	3
Special-Needs	0
Total	33

Table 56 - 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	3
Acquisition of Existing Units	0
Total	33

Table 57 - One Year Goals for Affordable Housing by Support Type

Discussion

During this program year the County is funding two (2) projects that assist affordable housing with CDBG funds: Catholic Charities - Self-Sufficiency & Intervention Program; and Lehigh County - Countywide Housing Rehabilitation. The County will begin to receive HOME funds from the Commonwealth of Pennsylvania to do affordable housing projects/activities during this Five Year Consolidated Plan period.

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 (HUD), 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 anticipates that it will receive \$506,299.00 under a HUD Capital Fund grant for FY 2019 that it will use to replace windows at Clarence Aungst Towers, replace kitchens at the Cherokee and Delaware Apartments, and replace sheeting, siding, insulation, and windows at 17th Street Village.

The FY 2019 allocation will be used for the following activities:

- Operations \$50,629.90
- Administration \$50,629.90
- Fees and Costs \$25,000.00
- Dwelling Structures \$380,039.20
- **Total: \$506,299.00**

The Lehigh County Housing Authority (LCHA) maintains 289 units of public housing and has a 96.2% occupancy rate. LCHA has a baseline of 1,652 Section 8 Housing Choice Vouchers, with 1,100 applications on the waiting list. The Lehigh County Housing Authority has selected residents to access and review its Annual Action Plan when available.

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

There are currently no Citizen Councils at properties owned and managed by the Lehigh County Housing Authority. Previous attempts have been made at the creation of Citizen Councils. However, these councils have all disbanded.

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. LCHA has a baseline of 1,652 Section 8 Housing Choice Vouchers, with 1,240 applications on the waiting list. The Lehigh County Housing Authority has selected residents to access and review the Annual Action Plan when available.

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 #3

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

Introduction

Lehigh and Northampton Counties are served by the Lehigh Valley Regional Homeless Advisory Board (LVRHAB), which is a subdivision of the Eastern PA CoC. According to the Governance Charter for the Eastern PA Continuum of Care Collaborative, the mission of the Eastern PA CoC is to end homelessness throughout the 33 county Continuum of Care. The CoC works toward ending homelessness by providing a framework for a comprehensive and well-coordinated regional and local planning process. This includes identifying needs, conducting a system-wide evaluation of existing resources and program activities, and building a system of housing and services that addresses those needs. This mission is pursued through the development of long-range plans to prevent and end homelessness in the geographic area, as well as the coordination necessary for successful implementation. The objectives of the CoC include the following:

- Promote development of adequate funding for efforts for preventing homelessness, rapidly re-housing homeless persons, and stabilizing their housing;
- Maximize potential for self-sufficiency among individuals and families experiencing homelessness; and
- Promote full access to, and effective use of, mainstream programs.

The LVRHAB Funding Committee is responsible for project selection and ranking for submission through the CoC's annual HUD application. In this capacity, the Committee reviews all documents from the previous funding round; sets a schedule and time line for the current funding round; develops and edits forms for new project and renewal evaluations; develops ranking criteria; collaborates with the Data Management, Collection, and Outcomes Committee, as necessary; and provides ranking reports to the CoC. In order to increase CoC-wide performance, ensure the strategic use of HUD funds, and develop new resources, the Funding Committee is also in charge of developing the CoC's reallocation strategy, which includes setting policy addressing funding cuts or allocation of additional resources in response to HUD's Continuum of Care NOFA.

The CoC provides funds for projects that assist homeless populations in the area through CoC funding and creates partnerships with other entities to utilize additional sources of funding. The City of Allentown receives ESG funds and is included with the local homeless coalition, along with representatives of various stakeholders and service providers. The CoC also funds Shelter Plus Care projects and Supportive Housing Programs (SHP) through the Lehigh County Housing Authority and its development entity, the Valley Housing Development Corporation.

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

The Continuum of Care completes an annual “Point in Time Count Survey” in January to determine the number of homeless individuals and families in the Eastern Pennsylvania Region. Based on the Point in Time Count (PITC) conducted during January 2019, the following numbers of homeless persons were reported in Lehigh County:

- **Unsheltered** - 56 individuals, 0 families with children, and 0 children only
- **Transitional Housing** - 53 individuals, 8 families with children, and 0 children only
- **Emergency Shelter** - 218 individuals, 43 families with children, and 0 children only

Current CoC policies place an emphasis on reducing Youth Homelessness. The CoC has developed the Lehigh Valley Youth Task Force to drive cross-sector systems to decrease homelessness among youth in the Lehigh Valley. Membership includes Children and Youth Services, the Allentown City Council, local schools, the Brady-Sullivan LGBT Community Center, Valley Youth House, and the Lehigh Valley Health Network. The CoC intends to increase knowledge of service providers and increase street outreach to target youth that may potentially become homeless.

Lehigh County funds the Catholic Charities – Self-Sufficiency & Intervention Program to assist at-risk households. This program provides counseling, short-term rental assistance, and utility payments to assist in the prevention of homelessness. In addition, at-risk persons will receive housing counseling services. Catholic Charities will also provide food for at-risk persons and families in conjunction with the Lehigh County Conference of Churches. Lehigh County, through its various human services programs, provides support to all the categories of non-homeless special needs populations. The County also funds the Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program, which assists at-risk persons with housing location assistance and provides fair housing workshops for landlords.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Eastern PA Continuum of Care operates a Coordinated Entry program, which was piloted in the Lehigh Valley and expanded to all 33 counties of the CoC, to ensure that those at-risk of homelessness or experiencing homelessness are connected to appropriate resources and services. The system ensures the management of access, assessment, prioritization, and referral to housing and services for any person experiencing or at imminent risk of homelessness throughout the region. A call center operated by PA 2-1-1 provides live voice intake and there are 17 access sites that provide face-to-face intake. Service providers are trained in housing first, the VI-SPDAT assessment, and other best practices to assist homeless persons in receiving proper services. The CoC conducts mobile outreach for vulnerable populations and includes ESL translation services with its intake services, as well as access for those who are hearing impaired. Coordinated Entry processes also provide information about service needs and identify gaps to help communities plan their assistance and resources.

Outreach to homeless persons will be conducted by service providers. Organizations like the Lehigh County Conference of Churches will contact the homeless individuals that use the emergency shelters during weather advisory. Lehigh County Conference of Churches will also make outreach to the chronically homeless that live in communities and attempt to assess them. This outreach, combined with case management, was funded by the CoC in FY 2018.

Youth homelessness is a major problem in the Lehigh Valley area, particularly for individuals in the 18-24 age group. It is estimated that up to 20% of the homeless people in the area fall in this age group. There is a need for a year-round shelter for this age group, as Valley Youth House does not serve youth over the age of 18. Focused outreach has been conducted by the CoC on this age group in partnership with Valley Youth House, and this population continues to be a priority for Lehigh County. The Bradbury-Sullivan LGBT Community Center partners with the Regional Homeless Advisory Board to provide housing and services to youth experiencing homelessness, as well as toiletry supplies and other products to homeless and housing-insecure LGBT youth in the Lehigh Valley. Valley Youth House is providing quarterly youth training to focus on educating providers in best practices for youth, including LGBT youth.

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

Lehigh County addresses the housing needs of the homeless population within the County through the Lehigh Valley Regional Homeless Advisory Board's (RHAB) steering of CoC funds to various projects. In partnership with the City of Allentown, the Lehigh Valley RHAB determines the projects that most effectively assist the homeless population of Lehigh County through coalition meetings. The Lehigh Valley RHAB does not receive ESG funding.

The shelter and transitional housing that is available in Lehigh County included the following:

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

The CoC has implemented various strategies to ensure that those transitioning out of homelessness are able to procure permanent housing, which resulted in a 4% increase in the transition from Emergency Shelter, Transitional Housing, and Rapid Rehousing into permanent housing during 2018. Diversion strategies have been used to place those that go through intake with the CoC into Rapid Rehousing. Many of the CoC funded transitional housing beds have been converted into Rapid Rehousing beds across the 33 county area. Rapid Rehousing providers have been trained in best practices including housing first strategy, focused case management, harm reduction, motivational interviewing, and trauma-informed care. Currently, there are 111 Rapid Rehousing beds in Lehigh County; 75 of these 111 Rapid Rehousing beds are dedicated to youth.

Rapid Rehousing programs are connected to landlords and households with affordable units to sustain permanent housing. The CoC makes sure to focus on in-home case management for the tenant, as well as engagement with the landlord. Additionally, the CoC partners with mainstream service providers, such as workforce development, child care, transportation, and other resources to promote long-term stability for persons and their families that have transitioned out of homelessness. There are also 243 Permanent Supportive Housing beds dedicated to chronically homeless individuals.

Valley Youth House is a major provider of services for the homeless youth in the area. Valley Youth House will assist individuals that may have been in foster care. Valley Youth House receives funding for both Transitional Housing and Rapid Rehousing activities. Youth homelessness is a major problem in the Lehigh Valley area, particularly for individuals in the 18-24 age group. It is estimated that up to 20% of the homeless people in the area fall into this age group. There is a need for a year-round shelter for this age group, as Valley Youth House does not serve children over the age of 18. Focused outreach has been conducted by the CoC on this age group in partnership with Valley Youth House, and this population continues to be a priority for Lehigh County.

Turning Point of the Lehigh Valley will provide housing to victims of domestic violence and their families. They provide 32 transitional housing beds for survivors fleeing immediate abuse and will partner with other agencies to find permanent housing for victims, including Third Street Alliance, which is the major Rapid Rehousing provider for this population.

Previously, Lehigh County had a robust program to assist veterans experiencing homelessness that received SSVF funding. Because of the success of the program and the resulting lower numbers of veteran homelessness, the Federal government cut funding for the program.

Discussion

The CoC allocated funding to the following projects under its multi-year program:

- Resources for Human Development, Inc. – LV ACT Housing Supports - \$90,031
- Lehigh County Conference of Churches – Outreach and Case Management for the Disabled, Chronically Homeless - \$97,559
- Lehigh County Conference of Churches – Pathways Housing 2 - \$185,277
- Lehigh County Conference of Churches – Tenant-Based Rental Assistance for the Disabled, Chronically Homeless - \$225,337
- Lehigh County Conference of Churches – Pathways Housing - \$198,874
- Lehigh County Housing Authority – LCHA S+C 2017 - \$204,168
- Valley Housing Development Corporation – VHDC SHP #2 2017 - \$131,657
- Valley Housing Development Corporation – VHDC SHP #3 2017 - \$66,828
- Lehigh County Conference of Churches – Pathways TBRA for Families, Youth, and Veterans - \$245,444
- Northampton County Housing Authority – NCHA S+C 2017 - \$105,513
- Catholic Charities of the Diocese of Allentown – Permanent Housing Program - \$71,863
- The Salvation Army, a New York Corporation – Allentown Hospitality House Permanent Housing Program - \$159,766
- Third Street Alliance for Women and Children – Lehigh Valley Rapid Re-Housing Program - \$148,164
- Valley Youth House Committee, Inc. – Lehigh Valley RRH for Families - \$284,072
- Valley Youth House Committee, Inc. – TH-RRH for Lehigh Valley Youth - \$479,930
- Valley Youth House Committee, Inc. – RRH Expansion Lehigh Valley - \$85,657
- Valley Housing Development Corporation – VHDC SHP \$4 2017 - \$113,486

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

Introduction:

Lehigh County's 2018 Analysis of Impediments to Fair Housing Choice has identified the following impediments, along with goals and strategies to address those impediments and affirmatively further fair housing in the County:

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

Impediment 1: Lack of Affordable Housing - There is a lack of affordable housing in Lehigh County due to the influx in the number of unskilled and semi-skilled workers who have moved into the County, which has created a high demand and a corresponding increase in the cost of rental and sales housing.

Goal: Increase the supply of affordable housing by new construction and rehabilitation of various types of housing that is affordable to lower income households.

Strategies: In order to address the need and achieve the goal for more affordable housing, the following activities and strategies should be undertaken:

- **1-A:** Continue to promote the need for affordable housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is affordable.
- **1-B:** Encourage and promote the development, construction, and/or rehabilitation of mixed-income housing in areas of the County which do not have a concentration of low-income households.
- **1-C:** Encourage and promote the development, construction, and/or rehabilitation of affordable housing in mixed-use properties with retail/office space on the lower levels and residences above.
- **1-D:** Support financially, the rehabilitation of existing housing owned by seniors and lower-income households to conserve the existing affordable housing stock in the County.
- **1-E:** Provide financial and development incentive to private developers and non-profits to construct and/or rehabilitate affordable housing.
- **1-F:** Continue to work with the Lehigh Valley Planning Commission Housing Study Group to promote the development, construction, and rehabilitation of affordable housing.

Impediment 2: Lack of Accessible Housing - There is a lack of accessible housing in Lehigh County since the supply of accessible housing has not kept pace with the demand caused by the increase in the percentage of elderly persons in Lehigh County and more disabled persons desiring to live independently.

Goal: Increase the supply of accessible housing by new construction and rehabilitation of accessible housing for persons who are disabled.

Strategies: In order to address the need and achieve the goal for more accessible housing, the following activities and strategies should be undertaken:

- **2-A:** Continue to promote the need for accessible housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is accessible to persons who are disabled.
- **2-B:** Support financially, improvements to single-family owner-occupied homes to make them accessible for the elderly and/or disabled so they can continue to live in their homes.
- **2-C:** Encourage and promote the development of accessible housing units in multi-family buildings as a percentage of the total number of housing units.
- **2-D:** Encourage and financially support landlords to make accommodations to units in their building so persons who are disabled can reside in their apartments.
- **2-E:** Enforce the Americans with Disabilities Act (ADA) and the Fair Housing Act (FHA) in regard to making new multi-family housing developments accessible and visitable for persons who are physically disabled.

Impediment 3: Barriers Limiting Housing Choice - There are physical, economic, and social barriers in Lehigh County which limit housing choices and housing opportunities for low-income households, minorities, and the disabled members of the County's population.

Goal: Eliminate physical, economic, and social barriers in Lehigh County and increase housing choices and opportunities for low-income households and members of the protected classes throughout Lehigh County.

Strategies: In order to achieve the goal for more housing choice, the following activities and strategies should be undertaken:

- **3-A:** Deconcentrate pockets of racial and ethnic poverty by providing affordable housing choices for persons and families to move outside of these areas.
- **3-B:** Support and promote the development of affordable housing in areas of opportunity where low-income persons and families may move.
- **3-C:** Support and promote the planning and model zoning efforts of the Lehigh Valley Planning Commission to eliminate "exclusionary zoning" and land development ordinances which restrict the development of affordable housing.
- **3-D:** Eliminate architectural barriers in public accommodations, public facilities, and multi-family new housing developments.
- **3-E:** Encourage LANta (the public transportation system) to develop additional routes to provide better access to job opportunities for low-income households.

Impediment 4: Lack of Housing Awareness - There is a lack of knowledge and understanding concerning the rights of individuals, families, and members of the protected classes in regard to the Fair Housing Act (FHA) and awareness of discriminatory practices.

Goal: Improve knowledge and awareness of the Fair Housing Act (FHA), related housing and discriminatory laws, and regulations, so that the residents in Lehigh County can Affirmatively Further Fair Housing (AFFH).

Strategies: In order to address the need and achieve the goal of promoting open and fair housing, the following activities and strategies should be undertaken:

- **4-A:** Continue to educate and make residents aware of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **4-B:** Continue to educate and make realtors, bankers, and landlords aware of discriminatory housing policies and to promote fair housing opportunities for all County residents.
- **4-C:** Sponsor and participate in a “Regional Housing Summit” to discuss housing needs and approaches to achieve more affordable housing in the County.
- **4-D:** Continue to financially support the Fair Housing organizations and legal advocacy groups to assist persons who may be victims of housing discrimination and/or not aware of how to file a housing complaint.
- **4-E:** Continue to monitor the data from the Home Mortgage Disclosure Act (HMDA) to ensure that discriminatory practices in home mortgage lending not take place.

Impediment 5: Lack of Economic Opportunities - There is a lack of economic opportunities in the County for lower-income households to increase their income and thus improve their choices of housing.

Goal: Improve the job opportunities in the County, which will increase household income and make it financially feasible to live outside concentrated areas of poverty.

Strategies: In order to address the need and achieve the goal for better economic opportunities, the following activities and strategies should be undertaken:

- **5-A:** Encourage and strengthen partnerships between public and private entities to promote economic development, improve the local tax base, and create a sustainable economy.
- **5-B:** Promote and encourage the expansion of existing commercial and light industrial enterprises, which will create more employment opportunities.
- **5-C:** Provide financial and development assistance to enterprises, which will create new job opportunities and higher wages for County residents.
- **5-D:** Identify development sites for potential private investment and/or expansion of existing enterprises.
- **5-E:** Continue to improve the infrastructure to underdeveloped areas of the County to promote new development and create new job opportunities.

- **5-F:** Continue to partner with Lehigh Career & Technical Institute to develop training programs for unemployed and underemployed persons in the County.

Discussion:

Lehigh County recently completed its Analysis of Impediments to Fair Housing Choice and will fund and encourage projects that make progress toward the goals determined in the AI.

DRAFT #3

AP-85 Other Actions – 91.220(k)

Introduction:

Lehigh County has developed the following actions planned to: address obstacles to meeting the 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 using LIHTCs or other funding sources.

The Lehigh Valley Planning Commission has developed various model zoning and land use controls to encourage affordable housing. Lehigh County will continue its work with the Lehigh Valley Planning Commission (LVPC) to develop and promote model ordinances for inclusionary zoning. 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

Under its FY 2019-2023 Five Year Consolidated Plan, Lehigh County proposes to foster and maintain affordable housing through the following Five Year goals and Strategies:

HOUSING STRATEGY – HSS

Goal:

Improve, preserve, and expand the supply of affordable housing for low- and moderate-income persons and families in Lehigh County.**Strategies:**

- **HSS-1 Home Ownership** - Promote and assist in developing homeownership opportunities for low- and moderate-income persons & families.
- **HSS-2 Mixed Income Housing** - Promote and assist in the development of mixed income housing, both rental housing and housing for homebuyers.
- **HSS-3 Housing Rehabilitation** - Promote and assist in the preservation of existing owner and renter occupied housing stock in the County.
- **HSS-4 Housing Construction** - Promote and assist in the development of affordable housing, both rental and sales housing.
- **HSS-5 Revitalization** - Promote and assist in the stabilization of residential neighborhoods by removing slums and blight, assembling sites for new housing, rehabilitation of existing housing, and code enforcement.
- **HSS-6 Fair Housing** - Affirmatively further fair housing by promoting fair housing choice throughout Lehigh County.
- **HSS-7 Housing Support** - Promote and assist in housing counseling and support services to low- and moderate-income persons and families.

Lehigh County will address the following goal in the FY 2019 Annual Action Plan:

- **HSS-3 Housing Rehabilitation** – Lehigh County will assist three (3) families through its Countywide Housing Rehabilitation (CWHR) Program.

Actions planned to reduce lead-based paint hazards

When accepting applicants for its housing rehabilitation program, Lehigh County will ensure that:

- Applicants for homeownership assistance receive adequate information about lead-based paint requirements.
- Staff properly determines whether proposed projects are exempt from some or all lead based paint requirements.
- A proper visual assessment is performed to identify deteriorated paint in the dwelling unit, any common areas servicing the unit, and exterior surfaces of the building or soil.
- Prior to occupancy, properly qualified personnel perform paint stabilization and the dwelling passes a clearance exam in accordance with the standards established in 24 CFR Part 35.

The home purchaser receives the required lead-based paint pamphlet and notices.

Actions planned to reduce the number of poverty-level families

Approximately 13.3% of Lehigh County's residents live in poverty, while 13.1% of the Commonwealth of Pennsylvania residents live in poverty. 27.3% of the City of Allentown's residents live in poverty. Female-headed households in the County with children are particularly affected by poverty at 36.8%.

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 (CACLTV) is the official anti-poverty agency. CACLTV 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, foreclosure mitigation counseling, child care, transportation to work for up to six (6) months and assistance in purchasing a dependable vehicle, and other various programs that empower low-income households by assisting them to develop the skills needed for independent living.

Lehigh County provides 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.

Lehigh County funded several projects with FY 2018 CDBG funds to assist residents and families living in poverty:

- Catholic Charities – Self-sufficiency & Intervention Program – \$29,700.00
- Communities in Schools of the Lehigh Valley – School-to-Career Program – \$25,000.00
- Lehigh Career & Technical Institute – Scholarships for Low-Income Residents – \$19,500.00
- Lehigh Carbon Community College Foundation – ESL for Communication Success - \$6,000.00
- Lehigh Valley Center for Independent Living – People Living in Accessible Community Environments (PLACE) Program – \$15,062.00
- The Literacy Center – ESL & ABE Courses – \$15,000.00
- Meals on Wheels – Meal Preparation and Delivery – \$20,000.00
- North Penn Legal Services – LMI Legal Help – \$10,000.00

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.

Pennsylvania CareerLink® Lehigh Valley 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 partnership aimed at revitalization in the County. In 2019, the partnership includes the following agencies:

- North Penn Legal Services
- Catholic Charities, Diocese of Allentown
- Lehigh Career & Technical Institute
- Meals on Wheels of the Greater Lehigh Valley
- Lehigh Valley Center for Independent Living (LVCIL)
- Lehigh Carbon Community College Foundation
- The Literacy Center
- Lehigh Valley Regional Homeless Advisory Board
- Lehigh Valley Community Land Trust (LVCLT)
- Communities in Schools of the Lehigh Valley

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 the Lehigh Valley
- Lehigh Valley Workforce Development Board
- Local elected officials

The County hired a third-party vendor, Community Grants, Planning & Housing, LLC (CGP&H) to implement its County-wide housing rehabilitation program. CGP&H is continuing its work with the

County to ensure that the housing rehabilitation program provides assistance to lower income homeowners.

Lehigh County is part of the Lehigh Valley Regional Housing Advisory Board. 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.

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's 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 any questions are discussed 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 PA CareerLink®, the Lehigh County Housing Authority and LCTI to identify Section 3 residents and businesses and to provide feedback on available job opportunities. Such partnerships help to develop a better understanding of community needs. The County budgeted \$19,500.00 in FY 2019 for the Lehigh Career & Technical Institute – Scholarships for Low-Income Residents project, which will provide four (4) scholarships for low- and moderate-income individuals, including Section 3 individuals, to attain a CDL-A and/or HEO certification.

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.

Discussion:

Not Applicable.

Program Specific Requirements

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

Introduction:

Lehigh County receives an annual allocation of CDBG funds. Since the County receives this federal allocation the questions below have been completed, as they are 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
	\$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
---	--------

CDBG Percentage:

- Administrative Percentage: 20.0%
- Public Service Percentage: 8.3%
- Low and Moderate Income Percentage: 100%

Public Participation Documents
FY 2019 Amendment #2 for CDBG-CV

Comment Period and Public Hearing Notification

Public Hearing Agenda

Public Hearing Comments

Public Hearing Participants

Proof of Posting – Dated Screen Shot

DRAFT #3

PUBLIC NOTICE
PUBLIC HEARING AND SUBSTANTIAL AMENDMENT
Lehigh County FY 2019 Annual Action Plan

Lehigh County invites public comment on the Substantial Amendment to the Fiscal Year 2019 Annual Action Plan. The public comment period will end on February 24, 2021.

A virtual public hearing will be held on February 22, 2021 at 11:00 am EDT. To participate in the teleconference, dial (425) 436-6348 and enter access code 289060. For additional information about the meeting or to arrange for special accommodations or alternative document formats contact lauriemoyer@lehighcounty.org.

Programs	Description	Fiscal Year	Original Budget	New Budget	Change
Reserved	Funding held in reserve	2019	\$315,085	\$0	-\$315,085
Technology Adaptations	Funding for the purchase and implementation of technology to address alternative service delivery needs.	2019	\$0	\$315,085	\$315,085
Food Security	Funding towards the purchase, storage, and distribution of food to banks and pantries.	2019	\$0	\$250,000	\$250,000
Financial and Legal Counseling	Foreclosure, unemployment compensation, legal and Fair Housing counseling.	2019	\$0	\$250,000	\$250,000
Housing Stabilization	Funding for security deposits, 6 months of rental, mortgage, and utility assistance, mortgage arrears, case management, emergency expenses, and housing search for LMI households.	2019	\$0	\$750,000	\$750,000
Administration	Administration for Lehigh County Operations	2019	\$73,795	\$91,705	\$17,910

The purpose of the hearing is to discuss the proposed amendments. Lehigh County plans to create the listed programs using its allocation of CDBG-CV funding. All programs will fulfill the CDBG-CV requirement of preparing, planning for, and/or responding to COVID-19, as well as provide assistance to low to moderate income households. Comments on the Substantial Amendment may be submitted to lauriemoyer@lehighcounty.org or by participating in the public hearing described above. All comments received on or by February 24, 2021 will be considered.

Lehigh County intends to submit the Substantial Amendment to the US Department of Housing and Urban Development (HUD) on or about February 25, 2021.

Posted on Lehigh County's website on 2/19/21, and remained on the website through 2/24/21.

Public Hearing
CDBG-CV Funding
Second Amendment to FY 2019
February 22, 2021 at 11:00 am

Housekeeping

- All of you are on mute. To unmute hit *6. To mute again hit *6.
- Attendance

What is CDBG-CV?

CDBG-CV funding guidelines are the same as CDBG, with a few key differences.

- Similarities
 - Projects must benefit households living outside the city limits of Allentown and Bethlehem.
 - Projects must fundable, meaning they must meet a national objective test.
 - These objectives are found on the LCDCE website. www.lehighcounty.org, under departments click on Community & Economic Development, under section links click CDBG Grant Application
 - Projects must be eligible, meaning the activity is listed on the CDBG Eligible Activities list.
 - Public service projects must still substantiate that they are providing either a new service or can prove a quantifiable increase in the level of need for an existing service.

Differences

- Projects funded under CDBG-CV must qualify for either the low- to moderate-income national objective or urgent need.
- All projects eligible under CDBG-CV must prevent, prepare for, and/or respond to the coronavirus.
- CDBG-CV does not limit the amount Lehigh County can award to public service projects.
- CDBG-CV allows for a two year spending window.
- CDBG-CV is gap filler funding.

Lehigh County was awarded two allocations of CDBG-CV. The CDBG-CV not yet allocated shall be divided into programs. Applicants can submit applications on a rolling basis until all funding has been awarded.

- Programs
 - Technology Adaptations - \$315,085
 - Food Security - \$250,000
 - Financial and Legal Counseling - \$250,000
 - Housing Stabilization - \$750,000

Lehigh County is proposing the increase of administration from \$247,619 to \$265,529.

Lehigh County will submit the substantial amendment to HUD no earlier than February 25, 2021.

Questions and Comments

lauriemoyer@lehighcounty.org

Amendment Comments

FY 2019 – Second Amendment for CDBG-CV

One question was posed regarding the ability of Lehigh County to modify the program allocations in the future. Lehigh County agreed that funding will be adjusted, and/or programs added or modified, based on need as voiced by applicants.

No additional comments were received during the comment period.

DRAFT #3

From: [Cyndi King](#)
To: [Laurie A Moyer](#)
Subject: FW: FreeConferenceCall Detail Report
Date: Monday, February 22, 2021 11:27:03 AM
Attachments: [image001.png](#)

From: FreeConferenceCall Services <noreply@freeconferencecall.com>
Sent: Monday, February 22, 2021 11:26 AM
To: Cyndi King <CyndiKing@lehighcounty.org>
Subject: FreeConferenceCall Detail Report

County of Lehigh Warning: This is an external email. Please exercise caution.



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Account Information

Date: February 22, 2021 10:55:01 AM
Dial-in number: ☐ (425) 436-6348
Access code: 289060
Account: #s12113812

Audio

Caller	Service Type	Start Time	End Time	Duration
+1 610 435 5334 - HAO		10:55:01 AM	11:25:50 AM	31m
+1 484 357 4908 - SHARON TREXLER		10:59:19 AM	11:25:40 AM	27m
+1 610 709 7544 - ALLENTOWN, PA		10:59:31 AM	11:25:44 AM	27m
+1 484 232 8654 - EMMAUS, PA		11:00:06 AM	11:25:44 AM	26m
+1 484 541 2195 - BRAIN PEDERSEN		11:00:14 AM	11:25:46 AM	26m
+1 215 275 9486 - TRIMBLE K		11:01:14 AM	11:25:47 AM	25m
+1 610 782 3000 - LEHIGH COUNTY C		11:02:38 AM	11:25:40 AM	24m
+1 610 837 7699 - GOVAN, DEIRDRE		11:03:46 AM	11:04:43 AM	1m
+1 610 837 7699 - GOVAN, DEIRDRE		11:05:14 AM	11:25:44 AM	21m

Number of attendees: 9
Toll minutes: 208m

Note: All times in Eastern Time

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Tel: (844) 844-1322

Fax: (562) 432-5250

Attendees included:

George Samuelson, Lehigh County

Brian Peterson, LVCIL

Mike Shaffer, Pinebrook Family Answers

Maria Cruz, Hispanic American Organization

Kathy Trembel, Pinebrook Family Answers

Sharon Trexler, Alburtis Borough

Laurie Moyer, Lehigh County

Comments:

None

DRAFT #3

PUBLIC NOTICE

PUBLIC HEARING AND SUBSTANTIAL AMENDMENT

Lehigh County FY 2019 and FY 2020 Annual Action Plans Lehigh County invites public comment on the Substantial Amendment to the Fiscal Year 2019 and 2020 Annual Action Plans. The public comment period will end on February 24, 2021.

A virtual public hearing will be held on February 22, 2021 at 11:00 am EDT. To participate in the teleconference, dial (425) 436-6348 and enter access code 289060. For additional information about the meeting or to arrange for special accommodations or alternative document formats contact lauriemoyer@lehighcounty.org

Programs	Description	Fiscal Year	Original Budget	New Budget	Change
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Financial and Legal Counseling	Foreclosure, unemployment compensation, legal and Fair Housing counseling.	2020	\$0	\$250,000	\$250,000
Housing Stabilization	Funding for security deposits, 6 months of rental, mortgage, and utility assistance, mortgage arrears, case management, emergency expenses, and housing search for LMI households.	2020	\$0	\$750,000	\$750,000
Administration	Administration for Lehigh County Operations	2020	\$247,619	\$265,529	\$17,910

The purpose of the hearing is to discuss the proposed amendments. Lehigh County plans to create the listed programs using its allocation of CDBG-CV funding. All programs will fulfill the CDBG-CV requirement of preparing, planning for, and/or responding to CO VID- 19, as well as provide assistance to low to moderate income households. Comments on the Substantial Amendments may be submitted to lauriemoyer@lehighcounty.org or by participating in the public hearing described above. All comments received on or by February 24, 2021 will be considered.

Lehigh County intends to submit the Substantial Amendments to the US Department of Housing and Urban Development (HUD) on or about February 25, 2021.

Annual Action Plans



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Public Participation Documents
FY 2019 Amendment for CDBG-CV

Public Hearing 1A and 1B Agenda and Comments

Public Hearing 1A Attendee List

Public Hearing 1B Attendee List

Proof of Publication Notice – CDBG-CV Notice of Funding Availability

Proof of Publication – Amendment of FY 2019 Annual Plan for CDBG-CV Awards

Amendment Comments

DRAFT #3

Public Hearing 1A and 1B

CDBG-CV Funding

Welcome

Housekeeping

- All of you are on mute. To unmute hit *6. To mute again hit *6.
- Attendance

What is CDBG-CV?

CDBG-CV funding guidelines are the same as CDBG, with a few key differences.

- Similarities
 - Projects must benefit households living outside the city limits of Allentown and Bethlehem.
 - Projects must fundable, meaning they must meet a national objective test.
 - These objectives are found on the LCDCED website. www.lehighcounty.org, under departments click on Community & Economic Development, under section links click CDBG Grant Application
 - Projects must be eligible, meaning the activity is listed on the CDBG Eligible Activities list.
 - Public service projects must still substantiate that they are providing either a new service or can prove a quantifiable increase in the level of need for an existing service.

Differences

- Projects funded under CDBG-CV must qualify for either the low- to moderate-income national objective or urgent need.
- All projects eligible under CDBG-CV must prevent, prepare for, and/or respond to the coronavirus.
- CDBG-CV does not limit the amount Lehigh County can award to public service projects.
- CDBG-CV allows for a two year spending window.
- CDBG-CV is gap filler funding.

How to Apply

- The application is available on the department's website.
 - www.lehighcounty.org, under departments click on community & economic development. On that page, scroll to Latest news and first thing is the notice for this public hearing. AT the bottom of the notice, click on read more. That will bring up the application.
- The application must be submitted via email or mail. It can't be uploaded via the department website, like the CDBG application.
- The deadline for submitting the application is 4 pm, May 15th.

Timeline for Release of Funds

- We plan to announce awards by May 19th.
- Seek Commissioner approval on May 28th and June 11th.
- If we have a contract from HUD, the subrecipient agreements will be executed by June 22nd.

- Contracts will be back dated to May 20th to enable you to encumber expenses prior to executing your contract.

Questions and Comments

Laurie Moyer

lauriemoyer@lehighcounty.org

Hearing 1A - no questions or comments were voiced.

Hearing 1B - no questions or comments were voiced.

DRAFT #3

Laurie A Moyer

From: FreeConference.com <support@freeconference.com>
Sent: Thursday, May 07, 2020 12:20 PM
To: Laurie A Moyer
Subject: FreeConference.com call summary

County of Lehigh Warning: This is an external email. Please exercise caution.

FreeConference.com call summary



FreeConference.com call summary

CDBG-CV Allocation Public Hearing – 1A
Thursday, May 7 2020 12:00 PM - 12:19 PM EDT
197 free minutes | 16 attendees

Rate this call

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Agenda

The purpose of the public hearing is to discuss Lehigh County's Community Development Block Grant - CV Program (CDBG-CV), and how it could be used to meet the needs of Lehigh County residents and businesses in response to, prepare for, and prevention of, coronavirus

Attendees

Caller

Sapan Shah
Internet

Duration

11:47 AM - 12:19 PM

1 (610) 533-****
17128328330

11:48 AM - 12:19 PM

Laurie Moyer
17128328330

11:55 AM - 12:18 PM

1 (908) 399-****
17128328330

11:55 AM - 12:18 PM

1 (610) 767-****
17128328330

11:57 AM - 11:59 AM

1 (484) 541-****
17172758940

11:58 AM - 12:14 PM

1 (610) 767-****
17128328330

11:59 AM - 12:19 PM

1 (610) 282-****
17128328330

12:00 PM - 12:18 PM

1 (484) 477-****
17172758940

12:00 PM - 12:15 PM

Seth
Internet

12:04 PM - 12:08 PM

1 (610) 390-****
17172758940

12:09 PM - 12:10 PM

Sapan
Internet

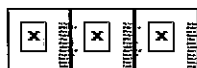
12:10 PM - 12:11 PM

Seth Hoderewski
Internet

12:13 PM - 12:13 PM

1 (484) 541-****
17172758940

12:14 PM - 12:19 PM



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- May 7 2020 12:00 PM EDT
- Access code: 7049527
- [Copy details](#)

Add to calendar:

[Outlook](#) [Mac](#) [Google](#) [Yahoo](#)

Description

The purpose of the
public hearing is
to discuss Lehigh

Participants (7)

[Show all](#)

LM

Laurie Moyer

lauriemoyer@lehighcounty.org

Attending

BP

Brian Pedersen

brianpedersen@lvcil.org

Attending

SH

Seth Hoderewski

sethhoderewski@lvcil.org

Attending

PA

pauletegilfoil@lehighcounty.org

pauletegilfoil@lehighcounty.org

Attending

DS

Dan Stevens

dstevens@slatington.org

Attending

DC

Dane Carroll

dc25@ustpd.org

Attending

SS

Sapan Shah

sapan@lvsolve.org

Invited

[Close](#)

Mary Kovalchick, LCCC

Laurie A Moyer

From: FreeConference.com <support@freeconference.com>
Sent: Thursday, May 07, 2020 6:05 PM
To: Laurie A Moyer
Subject: FreeConference.com call summary

County of Lehigh Warning: This is an external email. Please exercise caution.

FreeConference.com call summary



FreeConference.com call summary

CDBG-CV Public Hearing 1B
Thursday, May 7 2020 5:30 PM - 6:00 PM EDT
77 free minutes | 4 attendees

Rate this call

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Agenda

A public hearing to discuss Lehigh County's Community Development Block Grant - CV (CDBG-CV) allocation, and how it could be used to meet the needs of Lehigh County residents and businesses in response to, prepare for, and prevention of, coronavirus.

Attendees

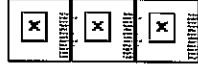
Caller	Duration
1 (484) 226-**** 17128328330	5:29 PM - 5:54 PM

1 (610) 737-****
17172758940

5:29 PM - 5:55 PM

Laurie Moyer
17128328330

5:30 PM - 5:54 PM



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7080 Hollywood Blvd · Suite 903 · Los Angeles, CA 90028 · USA

Attendees :

Chris Cassidy, CACLV

Nick Quinn, CACLV

DRAFT #3

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)

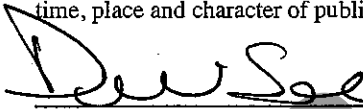
Copy of Notice or Advertisement

SS:

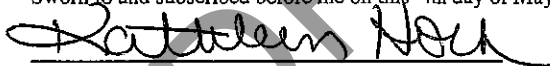
of THE MORNING CALL, LLC. of the County and State aforesaid, being duly sworn, deposes and says that THE MORNING CALL is a newspaper of general circulation as defined by the aforesaid Act, whose place of business is 101 North Sixth Street, City of Allentown, County and State aforesaid, and that the said newspaper was established in 1888 since which date THE MORNING CALL has 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::

May 02, 2020.

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.


Designated Agent, THE MORNING CALL, LLC.

Sworn to and subscribed before me on this 4th day of May, 2020


Notary Public

Commonwealth of Pennsylvania - Notary Seal
Kathleen Hoch, Notary Public
Lehigh County
My commission expires March 3, 2024
Commission number 1296535

Member, Pennsylvania Association of Notaries

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

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

THE MORNING CALL, LLC. a Corporation,
Publishers of THE MORNING CALL
A Newspaper of General Circulation

By: _____

Order # - 6666828

Proof of Publication Notice in the *Morning Call*

Sold To:

LC Office of Comm Dev - CU00164605
Government Ctr-Laurie Moyer 17 S 7th St
ALLENTOWN,PA 18101-2401

Bill To:

LC Office of Comm Dev - CU00164605
Government Ctr-Laurie Moyer 17 S 7th St
ALLENTOWN,PA 18101-2401

**LEHIGH COUNTY, PENNSYLVANIA
COMMUNITY DEVELOPMENT BLOCK
GRANT - CV (CDBG-CV)**

**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 May 7, 2020 at 12:00 pm and 5:30 pm, prevailing time, via conference call. To attend the conference call dial the toll free number of 717-275-8940 and when prompted enter the access code 704 9527.

The purpose of the public hearings is to discuss Lehigh County's Community Development Block Grant - CV Program (CDBG-CV), and how it could be used to meet the needs of Lehigh County residents and businesses in response to, preparation for, and prevention of, coronavirus. 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 amendment to the Consolidated Plan and application for CDBG-CV funding. The actual allocation of funds that Lehigh County is eligible to receive is \$757,860. At least 70% of the CDBG-CV funds must benefit low- and moderate-income persons. The County intends to afford citizens, local agencies, and interested parties the opportunity to become involved in the planning process.

Persons, organizations, or municipalities that wish to request funding should obtain a copy of the request for funding applications by visiting <http://www.lehighcounty.org/Departments/Community-Economic-Development> or emailing lauriemoyer@lehighcounty.org. Applications are due at 4:00 pm on May 15, 2020, to the Lehigh County Office of Community Development, Government Center, Room 519, Allentown, PA.

All interested persons are encouraged

Order # - 6666828

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COMMUNITY DEVELOPMENT BLOCK
GRANT - CV (CDBG-CV)PUBLIC HEARING NOTICE AND
REQUESTS FOR PROPOSALS
FROM NON-PARTICIPATING MUNICIPAL
AGENCIES

Notice is hereby given by Lehigh County, PA that it will hold public hearings on May 7, 2020 at 12:00 pm and 5:30 pm, prevailing time, via conference call. To attend the conference call dial the toll free number of 717-251-5046 and when prompted enter the access code 704 1507.

All interested persons are encouraged to attend one of the public hearings and to present oral or written testimony concerning the needs of Lehigh County residents and the use of CDBG-CV 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 email to kurtzweyer@lehighcounty.org.
610-820-6565 - 5/2/20legals
public notices

Legal Notice

As a result of the current closure of school district buildings pursuant to the directives set forth by Governor Wolf, notice is hereby given that the Board of School Directors ("Board") of the Southern Lehigh School District ("District") has changed the meeting location from Southern Lehigh High School to a virtual meeting platform for the Board meeting scheduled for Monday, May 11, 2020 at 7:30 p.m. The Board meeting for Monday, May 11, 2020 at 7:30 p.m. is cancelled. Information on how to access and participate in the virtual meeting will be made available on the District's public website: www.sld.org.Southern Lehigh School District
575 Main Street, Center Valley, PA 16944
Elaine A. Lebo, Board Secretary
610-666-006 - 5/2/2020Subscribe online
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I am a professional carpenter and I am looking for a few good people to join my team. I am looking for people who are hard working, honest, and have a good attitude. If you are interested, please call me at 610-820-6601.

I am a professional carpenter and I am looking for a few good people to join my team. I am looking for people who are hard working, honest, and have a good attitude. If you are interested, please call me at 610-820-6601.

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All Real Estate advertised herein is subject to the federal law housing act which makes it illegal to advertise any preference, limitation or discrimination based on race, color, religion, sex, handicap, familial status or marital status, or on intention to make any such preference, limitation or discrimination. We will not knowingly accept any advertising for Real Estate which is in violation of the law. All persons are hereby informed that all dwellings advertised are available on an equal opportunity basis.

The most money-saving coupons are in Sunday's paper.

THE
MORNING
CALLHome Repair
& MaintenanceTHE MORNING CALL
The Morning Call would like to inform you about The Home Improvement Consumer Protection Act, 53 P.S. § 517.1, et seq., effective July 1, 2009. The law applies to contractors who perform at least \$5,000 worth of home improvements a year. Contractors are required to submit an application in the Pennsylvania Attorney General's Office in order to obtain a registration number.THE REGISTRATION NUMBER MUST APPEAR IN ALL ADVERTISEMENTS CIRCULATED WITHIN THE COMMONWEALTH. The law defines advertisements as any statement promoting home improvement services in a newspaper, periodical, pamphlet, circular, billboard, sign, letterhead, business card or other printed materials. All contractors currently advertising in The Morning Call should contact their representative to include their registration number in their ads. The law allows consumers to verify a contractor's registration with Attorney General's Office by visiting the Attorney General's website or by calling the toll-free consumer hotline, 1-888-520-6680. You can learn more about the law and its requirements by visiting the Attorney General's website: <http://www.attorneygeneral.gov/hic.aspx>hauling
HAULING - All types of junk removal. 1 place to entire house clean outs. Will beat any price. (610) 324-0894. Registration # 23304986
Dial Direct 610-820-6565
Want to run your ad for 60 days? Call about our special!

LOOKING FOR BARGAIN BUYS? - Look first to classified. NEED REPAIRS? - Check the Business Service Directory.

Ad Number: 6666828-1S01 / PO# May 7, 2020
Insertion Number: LC Office of Community Development
Size: 1 x 0.06
Color Type: B&W
Description: May 7, 2020

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THE MORNING CALL

Publication Date: 05/02/2020

This E-Sheet confirms that the ad appeared in The Morning Call on the date and page indicated.

The most
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Sunday's paper.THE
MORNING
CALL

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)

Copy of Notice or Advertisement

SS:

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 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::

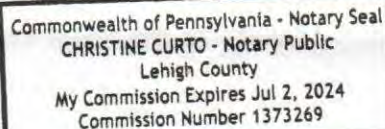
Sep 13, 2020.

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.


Designated Agent, THE MORNING CALL, LLC.

Sworn to and subscribed before me on this 15th day of September, 2020


Notary Public



PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

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

THE MORNING CALL, LLC. a Corporation,
Publishers of THE MORNING CALL
A Newspaper of General Circulation

By: _____

Order # - 6762964

Proof of Publication Notice in the *Morning Call*

Sold To:

Lehigh County Community Development - CU00164605
17 S 7th St
Allentown, PA 18101-2401

Bill To:

Lehigh County Community Development - CU00164605
17 S 7th St
Allentown, PA 18101-2401

NOTICE OF PUBLIC COMMENT
CDBG-CV Awards
FY 2019 Annual Plan for the Community
Development Block Grant Program
Amendment
Lehigh County, PA

Lehigh County will amend grant funds to award Community Development Block Grant CARES Act (CDBG-CV) funding to projects that plan, prepare for, and/or respond to the corona virus pandemic. Lehigh County will also reserve a portion of the \$757,860 allocation to fund projects responding to the impact of the corona virus pandemic in the Fall of 2020.

Copies of the amendment are available for public inspection and review from September 14, 2020 to September 18, 2020 on the Lehigh County Department of Community & Economic Development webpage.

<http://www.lehighcounty.org/Departments/Community-Economic-Development>

The amendment includes the following awards:

- Catholic Charities, Rent Conciliation Program - \$118,500
- CACLV, Foreclosure Mitigation Counseling - \$15,000
- CACLV, Sixth Street Shelter Rental Assistance Program - \$50,000
- Conference of Churches, Rental Assistance Program - \$105,480
- Lehigh Carbon Technical Institute, Scholarships - \$30,000
- The Literacy Center, Workforce Development Online Education - \$30,000
- North Penn Legal Services, Virtual Housing Clinics - \$20,000
- Grant Administration, Lehigh County DCED - \$73,795
- Reserved Allocation for Fall 2020 COVID - \$315,085

Interested persons are encouraged to express their views on the amendment in writing via mail (Office of Community Development, 17 South Seventh Street, Allentown, PA 18101) or email (lauriamover@lehighcounty)

Client Name: / PO# FY 2019 Annual P
 Advertiser: Lehigh County Community Development
 Section/Page/Zone: FEATURES/U013/1
 Description: FY 2019 Annual Plan

Ad Number: 6762964-1S01
 Insertion Number: 1 x 0.06
 Size: B&W
 Color Type: 1 x 0.06

Publication Date: 09/13/2020

This E-Sheet confirms that the ad appeared in The Morning Call on the date and page indicated. You may not create derivative works, or in any way exploit or repurpose any content displayed or contained on the electronic tearsheet

legals, public notices

Districts, the existing use of "Pocket Neighborhood Development" shall be changed to "P" for "Permitted by Right" in the column for the R-MAP zoning district.

Part Three. Repealer. All ordinances to the contrary, insofar as they conflict with the provisions of this Ordinance Amendment are hereby repealed to the extent of the inconsistency.

Part Four. Severability. The provisions of this Ordinance Amendment are declared to be severable. If any provision of this Ordinance Amendment is declared by a court of competent jurisdiction to be invalid or unconstitutional, such determination shall have no effect on the remaining provisions of this Ordinance Amendment or other sections of the Zoning Ordinance.

Effective Date. That this Ordinance will take effect ten (10) days after final passage.

City Council will consider the foregoing at a Public Hearing on Wednesday, September 30, 2020 at 4:00 PM at Council Chambers, 435 Hamilton Street, Allentown, PA 18101. Copies of the full text of this Ordinance are available to any interested party for examination and copying at cost at the City Clerk's Office or for inspection during regular business hours of the offices of this newspaper and the Lehigh County Department of Law. All interested parties are invited to comment. The meeting will be livestreamed. The link to the meeting can be found on the city website at <https://www.allentownpa.gov>. Council will receive comments on the legislation prior to the meeting and will consider all comments from city residents. All comments must include name and address, including your city and be emailed to Michael.Honig@allentownpa.gov by 2:00 PM on the date of the meeting or you can enter your comments directly on the website. Comments received from city residents by that deadline will be forwarded to the Mayor and Council members prior to the meeting. Timely received comments will also be posted on the City's website as a supporting document to the meeting. City Council may adopt this amendment to the Zoning Ordinance and Zoning Map at a Special Council Meeting at 7:30 pm immediately following this Public Hearing.

Michael P. Hanlon
 City Clerk
 610-262-7747
 610-262-7747

Notice
 Lower Saucon Township in Northampton County is seeking qualified applicants for the position of a full-time Crewman position in the Public Works Department. The position is a Class A license preferred. Candidates are subject to pre-employment physical and drug test. Interested applicants may download an application and position requirements on our website at www.lowerSauconTownship.org. Applications will be received until September 23, 2020. All qualified applicants will receive consideration for employment without regard to race, color, religion, creed, ancestry, national origin, age, sex or non-job related handicap. EOE.

Leslie Huhn Township Manager
 610-262-7747

NOTICE OF PUBLIC COMMENT
 FOR THE
 FY 2019 Annual Plan for the Community Development Block Grant Program
 Allentown, Lehigh County, PA

Lehigh County will amend grant funds to award Community Development Block Grant CDBG Act (CDBG) funding to projects that plan, prepare for, and/or respond to the coronavirus pandemic. Lehigh County will also reserve a portion of the \$750,000 allocation to fund projects responsive to the impact of the coronavirus pandemic in the Fall of 2020.

Copies of the amendment are available for public inspection and review at September 14, 2020 to September 18, 2020 on the Lehigh County Department of Community & Economic Development website.

<http://www.lehighcounty.org/departments/Community-Economic-Development>

The amendment includes the following awards:

- Catholic Charities, Rent Cancellation Program - \$110,000
- CACV, Foreclosure Mitigation Counseling - \$15,000
- CACV, Sixth Street Shelter Rental Assistance Program - \$30,000
- Conference of Churches, Rental Assistance Program - \$105,000
- Lehigh Carbon Technical Institute, Scholarship - \$30,000
- The Literacy Center, Workforce Development Online Education - \$30,000
- North Penn Legal Services, Virtual Housing Clinics - \$20,000
- Grant Administration, Lehigh County COVID - \$75,000
- Reserved Allocation for Fall 2020 COVID - \$15,000

Interested persons are encouraged to express their views on the amendment in writing via mail to the Office of Community Development, 17 South Seventh Street, Allentown, PA 18101 or email (lauren@lehighcounty.org). Comments will also be accepted via phone (610-811-1944). All comments received on or by 5:00 p.m. on September 18, 2020 will be considered. The amendment shall be submitted to HUD on September 21, 2020.

BY ORDER OF: County of Lehigh, Government Center, Community Development, 17 S. 7th St., Allentown, PA 18101

610-262-7747
 WANT SOME EXTRA CASH? PRICE IT RIGHT - Describe it adequately, and call our classified department to sell your unwanted items today. Extra cash is as simple as that!
 Call 610-820-4565.

A SMALL, INEXPENSIVE - classified ad will help you solve your renting, selling or hiring needs. Call 610-820-4565 to discuss the many advertising packages available to suit your needs.

WANT SOME EXTRA CASH? PRICE IT RIGHT - Describe it adequately, and call our classified department to sell your unwanted items today. Extra cash is as simple as that!
 Call 610-820-4565.

- Want Some Extra Cash? Price it right, describe it adequately, and call our classified department to sell your unwanted items today. Extra cash is as simple as that!
 Call 610-820-4565.

- We will help you write on ad for any items you want to sell, we're Classified Salespeople Call 610-820-4565.

legals, public notices

MEETING NOTICE
 The Lehigh County Housing Authority Board meeting scheduled for Wednesday, September 16, 2020 at 12:00 pm at 643 Broad Street, Emmaus, PA, will be held at this location due to COVID-19 restrictions. Instead, a virtual, public meeting will be held on Wednesday, September 16, 2020 at 12:00 pm at 643 Broad Street, Emmaus, PA. Use the link below to attend via Internet, or call the telephone numbers listed to attend by phone.

Part Four. Severability. The provisions of this Ordinance Amendment are declared to be severable. If any provision of this Ordinance Amendment is declared by a court of competent jurisdiction to be invalid or unconstitutional, such determination shall have no effect on the remaining provisions of this Ordinance Amendment or other sections of the Zoning Ordinance.

Effective Date. That this Ordinance will take effect ten (10) days after final passage.

City Council will consider the foregoing at a Public Hearing on Wednesday, September 30, 2020 at 4:00 PM at Council Chambers, 435 Hamilton Street, Allentown, PA 18101. Copies of the full text of this Ordinance are available to any interested party for examination and copying at cost at the City Clerk's Office or for inspection during regular business hours of the offices of this newspaper and the Lehigh County Department of Law. All interested parties are invited to comment. The meeting will be livestreamed. The link to the meeting can be found on the city website at <https://www.allentownpa.gov>. Council will receive comments on the legislation prior to the meeting and will consider all comments from city residents. All comments must include name and address, including your city and be emailed to Michael.Honig@allentownpa.gov by 2:00 PM on the date of the meeting or you can enter your comments directly on the website. Comments received from city residents by that deadline will be forwarded to the Mayor and Council members prior to the meeting. Timely received comments will also be posted on the City's website as a supporting document to the meeting. City Council may adopt this amendment to the Zoning Ordinance and Zoning Map at a Special Council Meeting at 7:30 pm immediately following this Public Hearing.

Michael P. Hanlon
 City Clerk
 610-262-7747
 610-262-7747

Notice
 Lower Saucon Township in Northampton County is seeking qualified applicants for the position of a full-time Crewman position in the Public Works Department. The position is a Class A license preferred. Candidates are subject to pre-employment physical and drug test. Interested applicants may download an application and position requirements on our website at www.lowerSauconTownship.org. Applications will be received until September 23, 2020. All qualified applicants will receive consideration for employment without regard to race, color, religion, creed, ancestry, national origin, age, sex or non-job related handicap. EOE.

Leslie Huhn Township Manager
 610-262-7747

NOTICE OF PUBLIC COMMENT
 FOR THE
 FY 2019 Annual Plan for the Community Development Block Grant Program
 Allentown, Lehigh County, PA

Lehigh County will amend grant funds to award Community Development Block Grant CDBG Act (CDBG) funding to projects that plan, prepare for, and/or respond to the coronavirus pandemic. Lehigh County will also reserve a portion of the \$750,000 allocation to fund projects responsive to the impact of the coronavirus pandemic in the Fall of 2020.

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<http://www.lehighcounty.org/departments/Community-Economic-Development>

The amendment includes the following awards:

- Catholic Charities, Rent Cancellation Program - \$110,000
- CACV, Foreclosure Mitigation Counseling - \$15,000
- CACV, Sixth Street Shelter Rental Assistance Program - \$30,000
- Conference of Churches, Rental Assistance Program - \$105,000
- Lehigh Carbon Technical Institute, Scholarship - \$30,000
- The Literacy Center, Workforce Development Online Education - \$30,000
- North Penn Legal Services, Virtual Housing Clinics - \$20,000
- Grant Administration, Lehigh County COVID - \$75,000
- Reserved Allocation for Fall 2020 COVID - \$15,000

Interested persons are encouraged to express their views on the amendment in writing via mail to the Office of Community Development, 17 South Seventh Street, Allentown, PA 18101 or email (lauren@lehighcounty.org). Comments will also be accepted via phone (610-811-1944). All comments received on or by 5:00 p.m. on September 18, 2020 will be considered. The amendment shall be submitted to HUD on September 21, 2020.

BY ORDER OF: County of Lehigh, Government Center, Community Development, 17 S. 7th St., Allentown, PA 18101

610-262-7747
 WANT SOME EXTRA CASH? PRICE IT RIGHT - Describe it adequately, and call our classified department to sell your unwanted items today. Extra cash is as simple as that!
 Call 610-820-4565.

A SMALL, INEXPENSIVE - classified ad will help you solve your renting, selling or hiring needs. Call 610-820-4565 to discuss the many advertising packages available to suit your needs.

WANT SOME EXTRA CASH? PRICE IT RIGHT - Describe it adequately, and call our classified department to sell your unwanted items today. Extra cash is as simple as that!
 Call 610-820-4565.

- Want Some Extra Cash? Price it right, describe it adequately, and call our classified department to sell your unwanted items today. Extra cash is as simple as that!
 Call 610-820-4565.

- We will help you write on ad for any items you want to sell, we're Classified Salespeople Call 610-820-4565.

bargain box

FREE BARGAIN BOX ADS
 If you have merchandise other than pets and commercial property, and all items listed total \$250 or less, we will run a free 3 line ad for 8 days. One ad per household every 30 days. No guaranteed run dates.

All Free Bargain Box Ads must be submitted using The Morning Call Self Service Tool. www.morningcall.com/self-service. No real ads accepted. www.morningcall.com/self-service

AIR HOCKEY TABLE - Well loved, works fine. \$897. \$25 OBO. Call 610-217-2884 or leave message. No guaranteed run dates.

KITCHEN AID ULTRA POWER MIXER - Includes food grinder. Great shape. Model KSM90. \$400. 610-432-3575

OUTSIDE FOUNTAINS 2 @ \$201.10 \$30 - all have pumps \$107-6602

WANTED VERY OLD BEER CANS - 1930's to 1960's flat tops and cans tops call bill 5705207519

WHEELCHAIR - 700 lb cap. \$250. 610-570-0307

RAINBOW VACUUM - All attachments, power nozzle, manuals, works well, can deliver ASE \$150 484-523-5356

VHS PLAYER / DISNEY TAPES - VHS player 126. Dis tapes 20. 610-248-8873

PILATES CHAIR - Usage chair, 4 DVDs, including Susan Luck's Favorite Moves. \$100 OBO 267-041574

SUNBEAM STAND MIXER - Two bowls and beaters and dough hooks. Call 610-261-4211 and leave message

PLAYSTATION 3 - If it doesn't work, you get your money back \$140 OBO. 484-714-1244

KITCHEN - RICE COOKER, CREPE MAKER, AND OVEN - \$100. 610-261-4211

FEDORA CAVANAGH - FELT KELLY GREEN SZ 7 1/2, EC, ORIGINAL BOX - \$200. 610-909-0528

RUSSIAN VINTAGE - SAKOVAR, MA TRIOSKA, POTTERY, CRYSTAL, ARMY UNIFORM - \$20 OBO 610-909-0528

ANTIQUES - CHEAP - Hoosier cabinet, 1920's ice chest and more. Call 610-261-4211 or text for pics 908-246-9877

HALLOWEEN - 29 Assorted inside decor items \$1-45. Ken 610-437-6362

ROLL TOP DESK AND CHAIR - Desk is 48" wide, 40" high, 22" deep. \$125. 610-758-9111

NEW VINYL SOFFIT - approx 45 ft white - sold & vented \$30 398 9663

3 BRAND NEW STAR TREK PLATES - New in box - Kirk, Spock, Enterprise. \$10 each 610-261-1653

LUMBER - treated pine lumber 2x4x10 \$3.00 per board 610-838-2663

18" USED MATCHBOX & WHEELS - Asking \$75. Call 610-868-4466

NESCO 4 QT OVEN - with cookbook. \$24. 610-261-4211

2 OUTDOOR PRELIT XMAS TREES - 3ft, 4ft, 5ft. \$90 for both. 1130 West Green St., Allentown. 11am-5pm

WANT TO CLEAN OUT YOUR CLOSET? - We'll take your clothes, shoes, and more. Call 610-820-4565 and order your ad today!

Join Our Team
 At CSG you will have the opportunity to assist adults with intellectual & developmental disabilities (IDD) in many ways, including building independent lives & a connection to their community across the Lehigh Valley.

Direct Support Professionals (DSP)
 FT/PT/PRN - All Shifts
 PT - 1st Shift

Become a valued member of the CSG Team and make an impact in someone else's life, while also making a difference in your own.

CSG offers Health Insurance & Benefits including generous paid time off, extensive paid training, career advancement, 401K & more!

Apply at: csgonline.org EOE

Full-Time Warehouse Team Member
 Shifts: Day, Overnight, Weekend • Location: Bensalem, PA | Easton, PA
 Hourly pay rate:
 Earn \$15.25/hr - \$16.40/hr, plus benefits and a \$500 sign-on bonus.
 * Bonus applicable to start dates between 9/6-10/3.

Amazon is hiring for the following types of roles in your area:
 Fulfillment Centers - Work inside Amazon warehouses, selecting, packing and shipping customer orders.
 Basic qualifications: High school or equivalent diploma
 Go to amazon.force.com to apply

Positions Available
 • Day Program Professional
 • Day Program Professional/Program Specialist
 \$1000 sign on bonus, if hired by Sept. 20
 For more info call 570-702-8088
 www.KCRNow.com
 An Equal Opportunity Employer
 KCR Care, it's a Great Place to Work.

articles for sale

OLD CROCKS - All Sizes, Used, Brand- ed, \$1200. Or Best Offer 610-262-7747

OLD FARM HOUSES WINDOWS - Vintage, \$300. Or Best Offer 610-262-7747

wanted automotive
 BUYING UNWANTED VEHICLES - ANY COND - FREE TOWING 610-432-7700 DALES AUTO SALES

SCOPE OUT a great find!

virtual Job Fair

THE MORNING CALL

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YARD SALES

garage/ yard sales

Bethlehem - 331 Park Ave Sat 9/12 & Sun 9/13 10am-5pm. Estate Sale. Breakfront, nice side table & chairs, sofa & 2 chairs, hutch with mirror, coffee table & 2 end tables. 610-217-9909

The most money-saving coupons are in Sunday's paper.

The most money-saving coupons are in Sunday's paper.

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Amendment Comments
FY 2019 Amendment for CDBG-CV

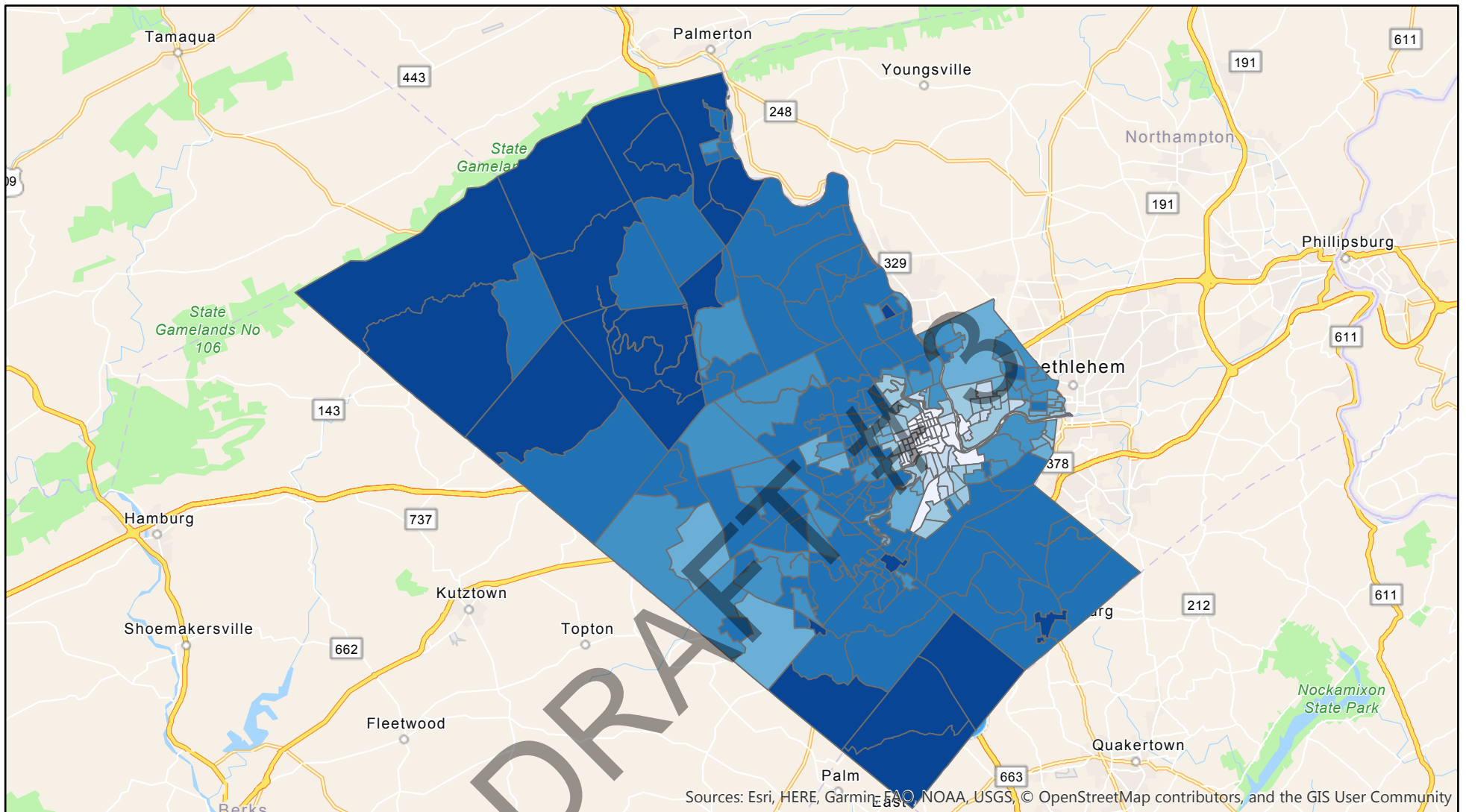
No questions or comments were received during the comment period.

DRAFT #3

MAPS

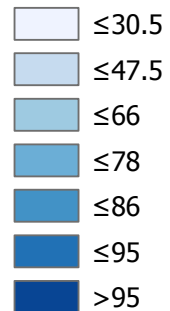
DRAFT #3

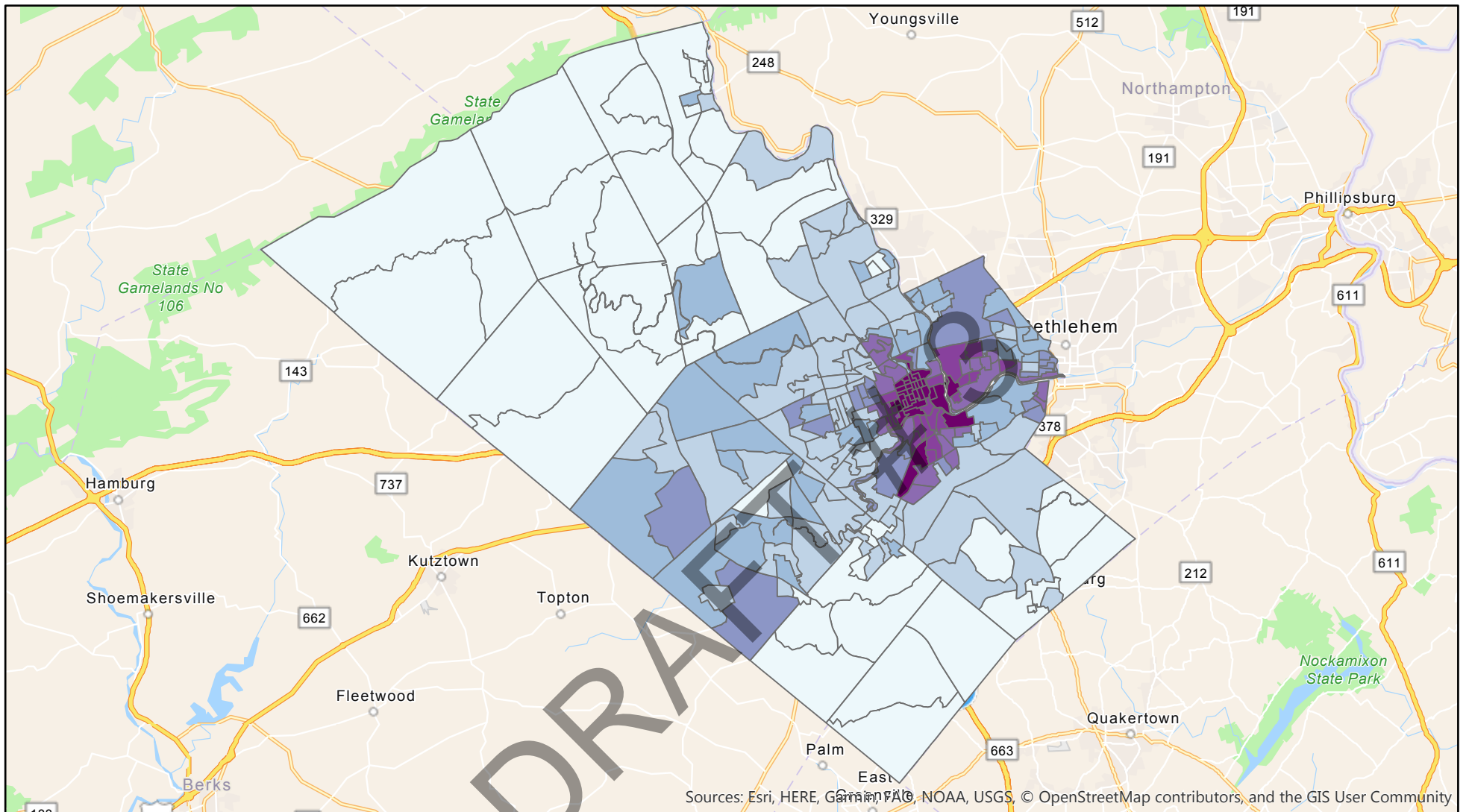




Lehigh County Census Block Groups

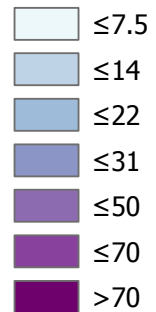
Percent White

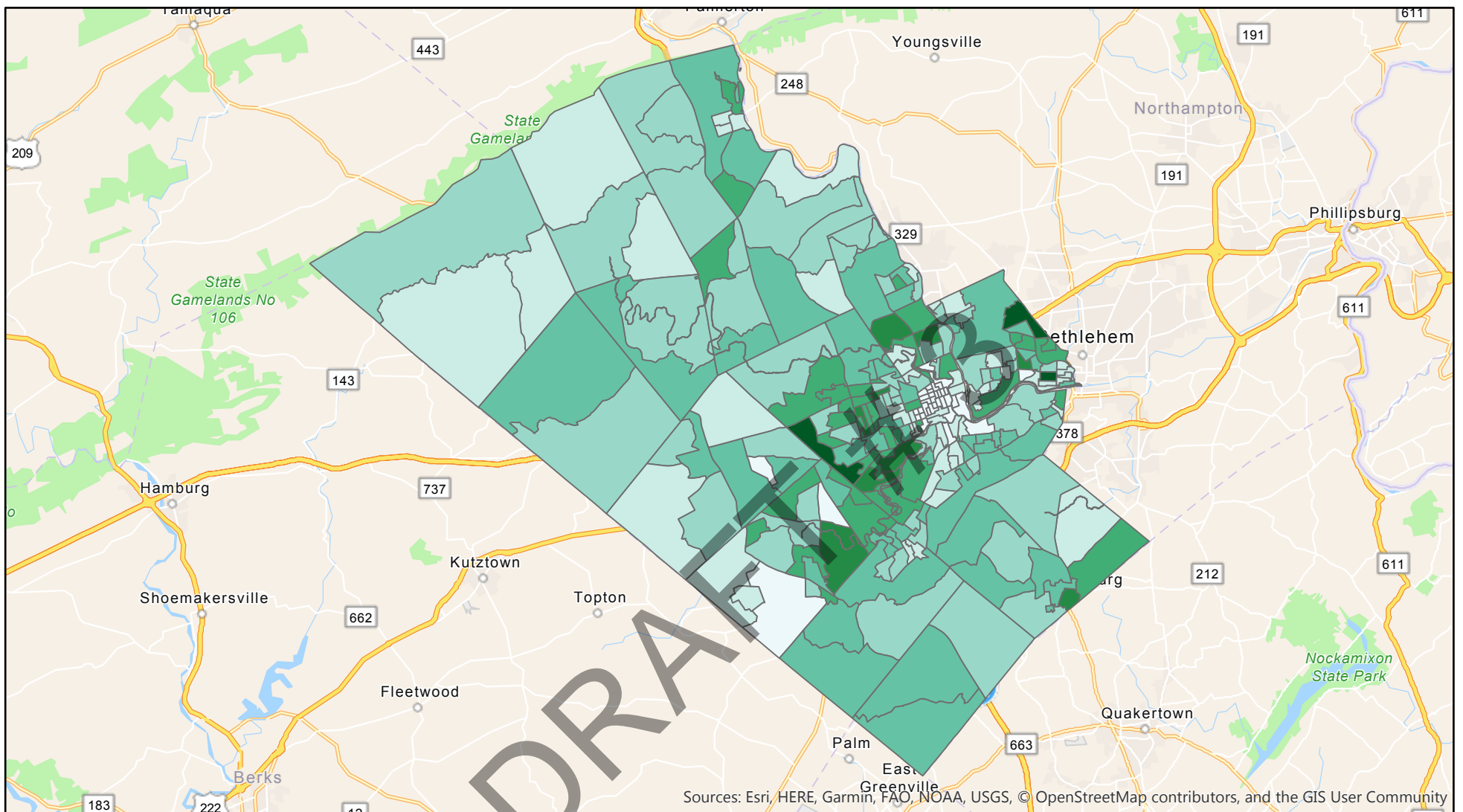




Lehigh County Census Block Groups

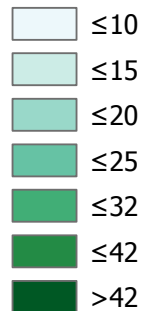
Percent Minority

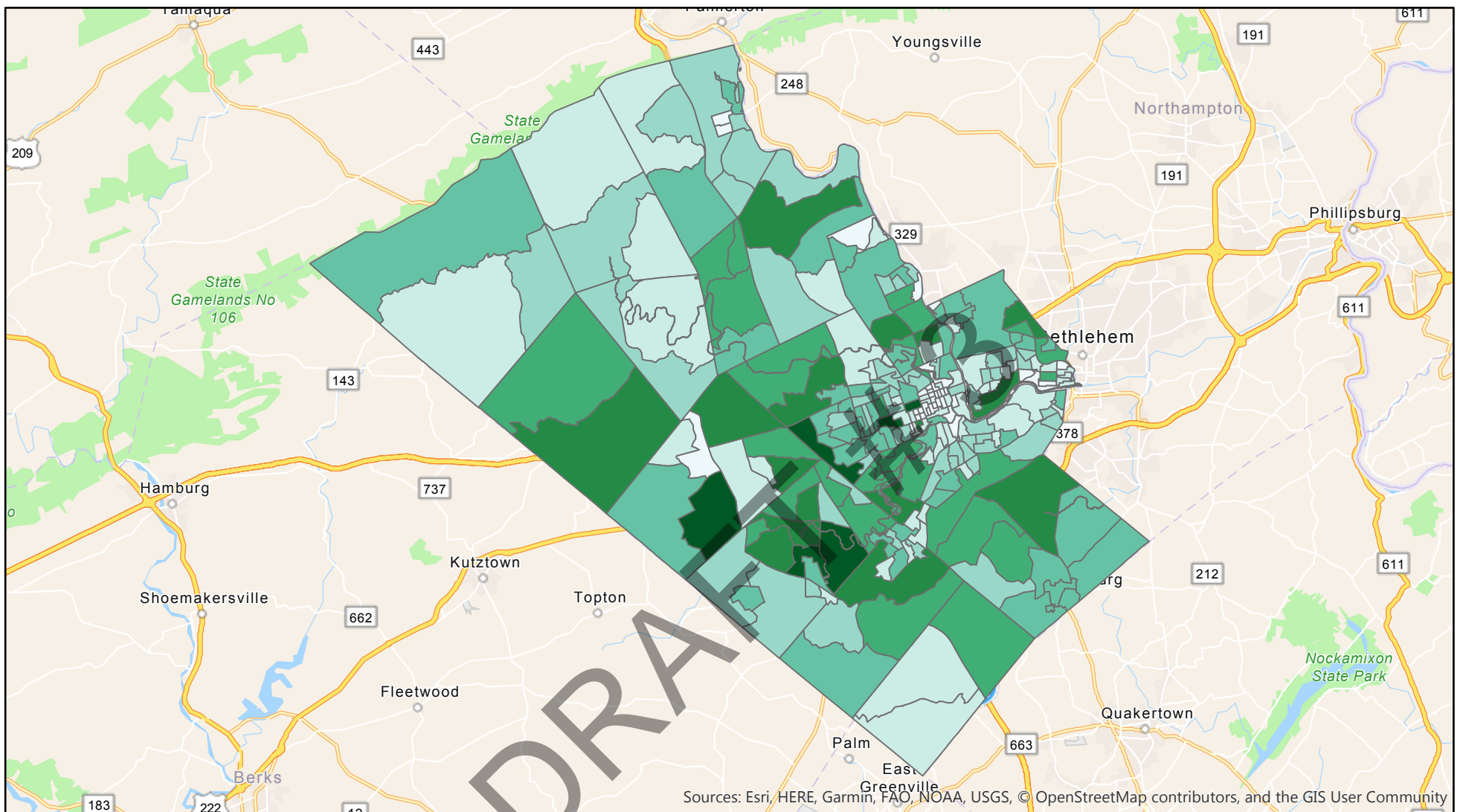




Over 65 by Block Group

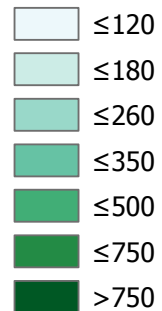
Percent Over 65

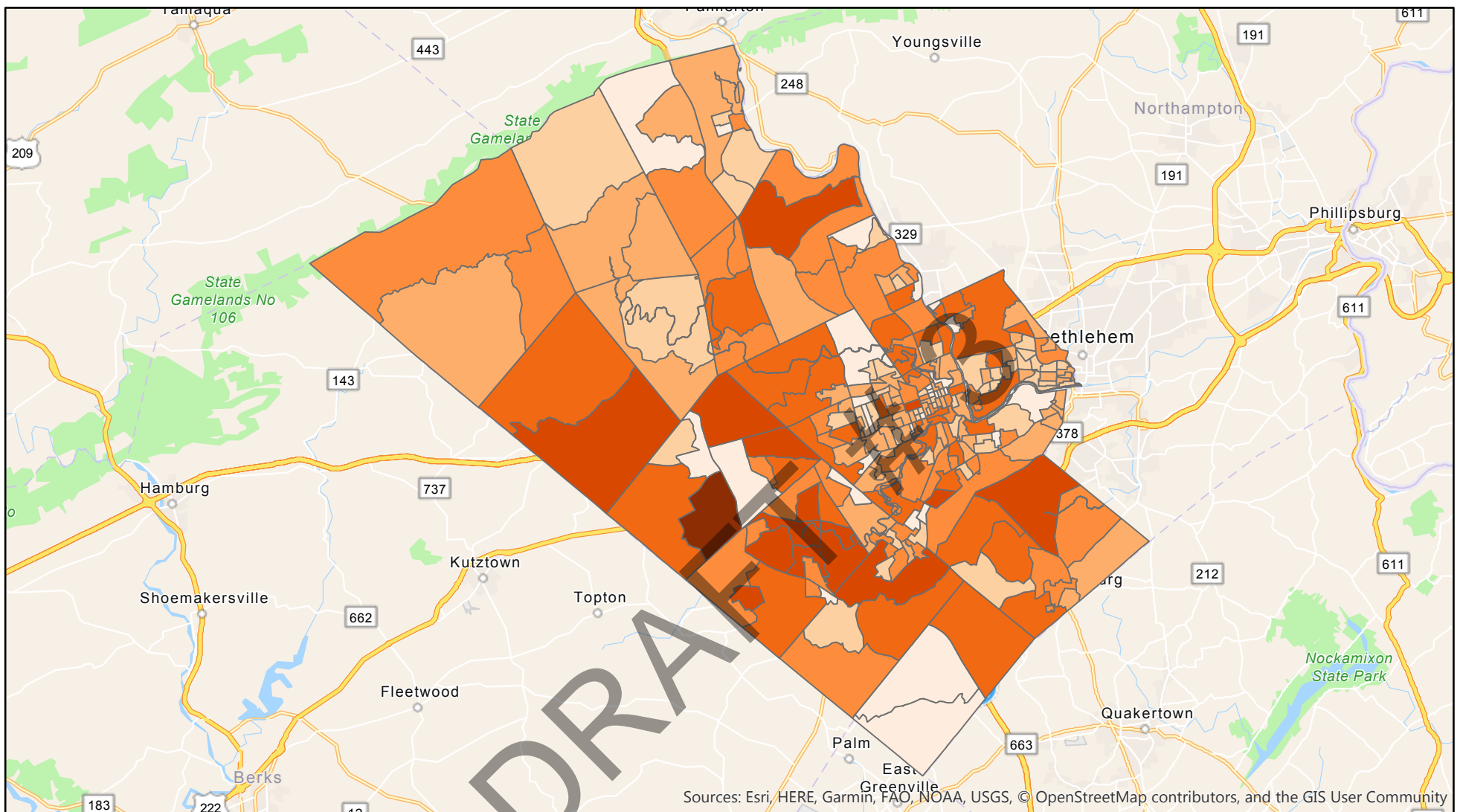




Over 65 by Block Group

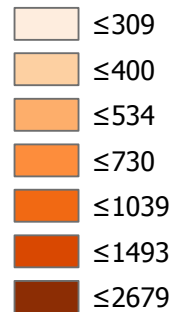
Over 65

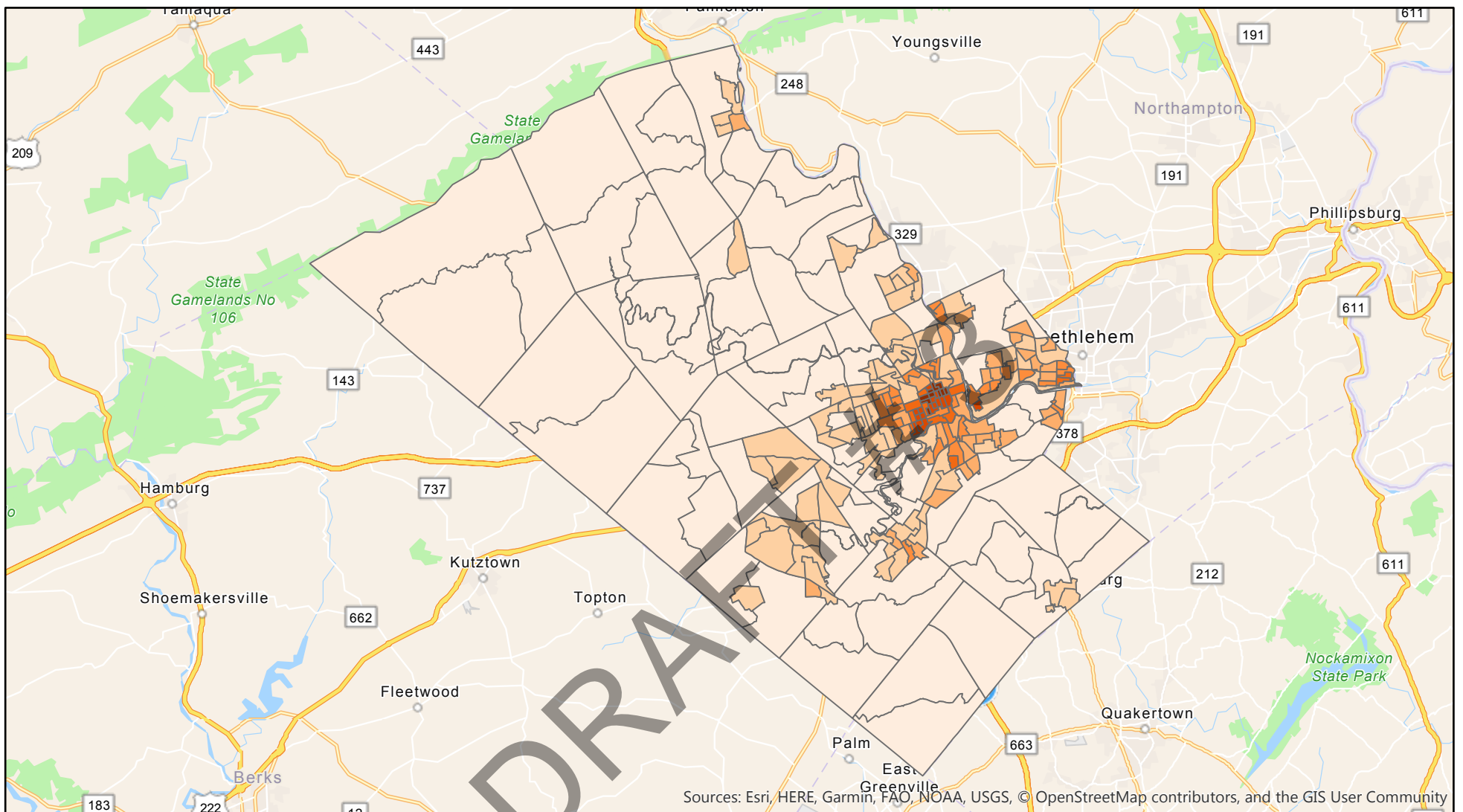




Lehigh County Census Block Groups

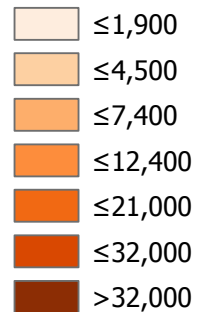
Total Households

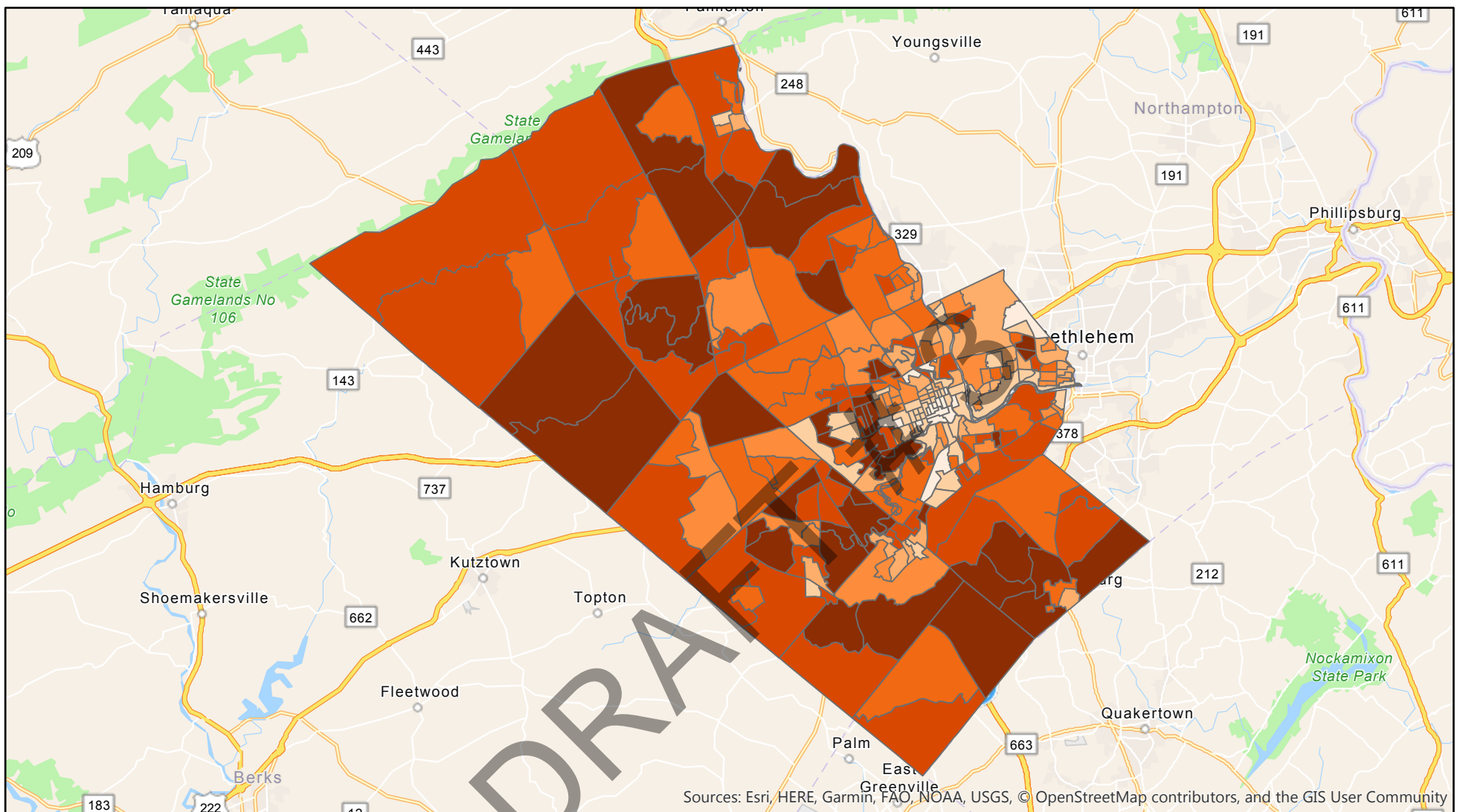




Lehigh County Census Block Groups

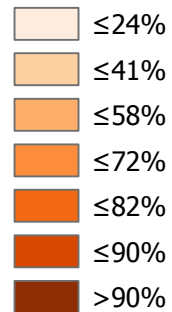
Population Density (Pop per Square Mile)

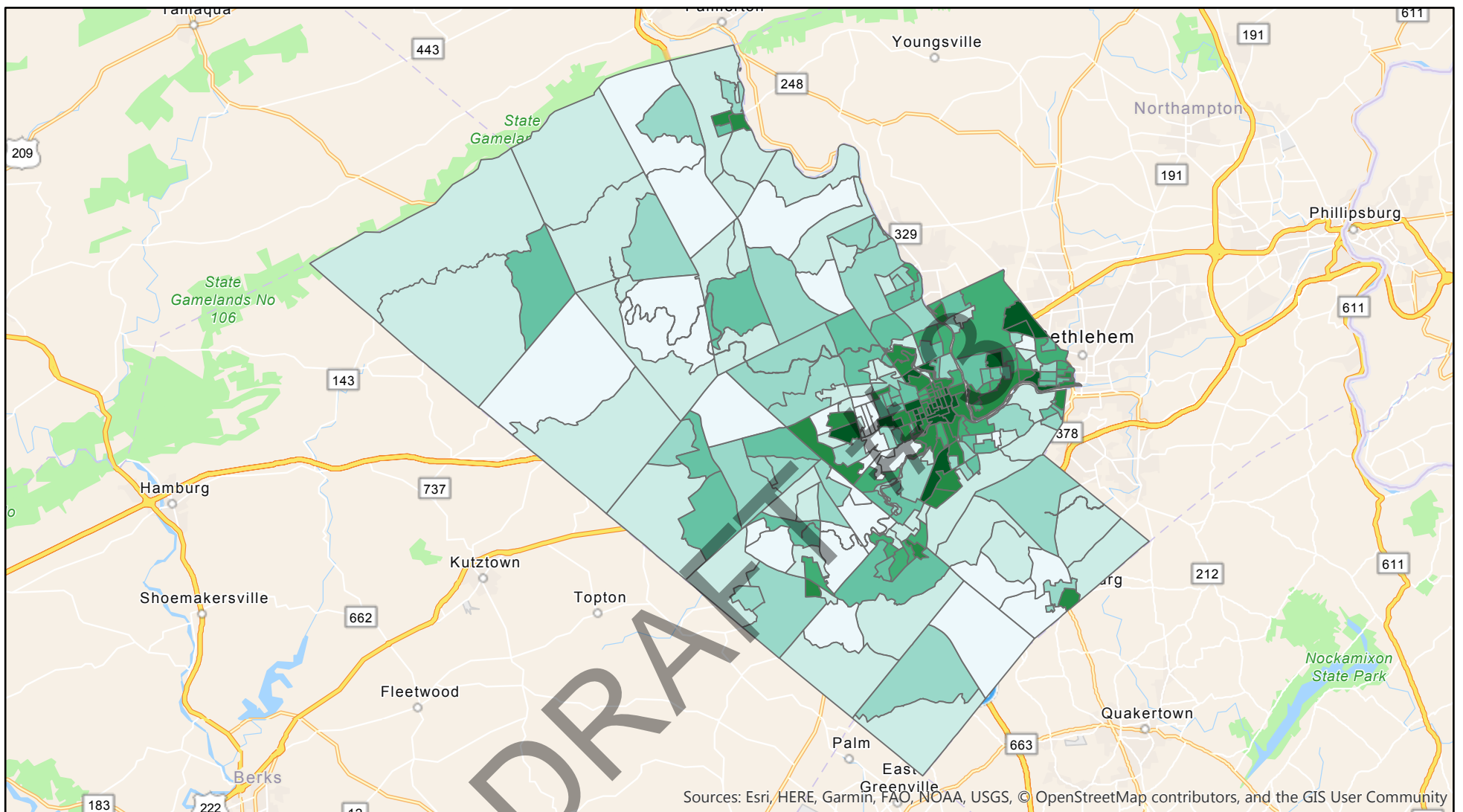




Lehigh County Census Block Groups

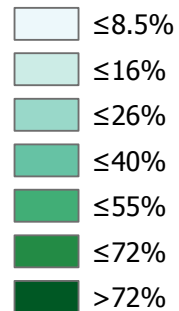
Percent Owner-Occupied Units

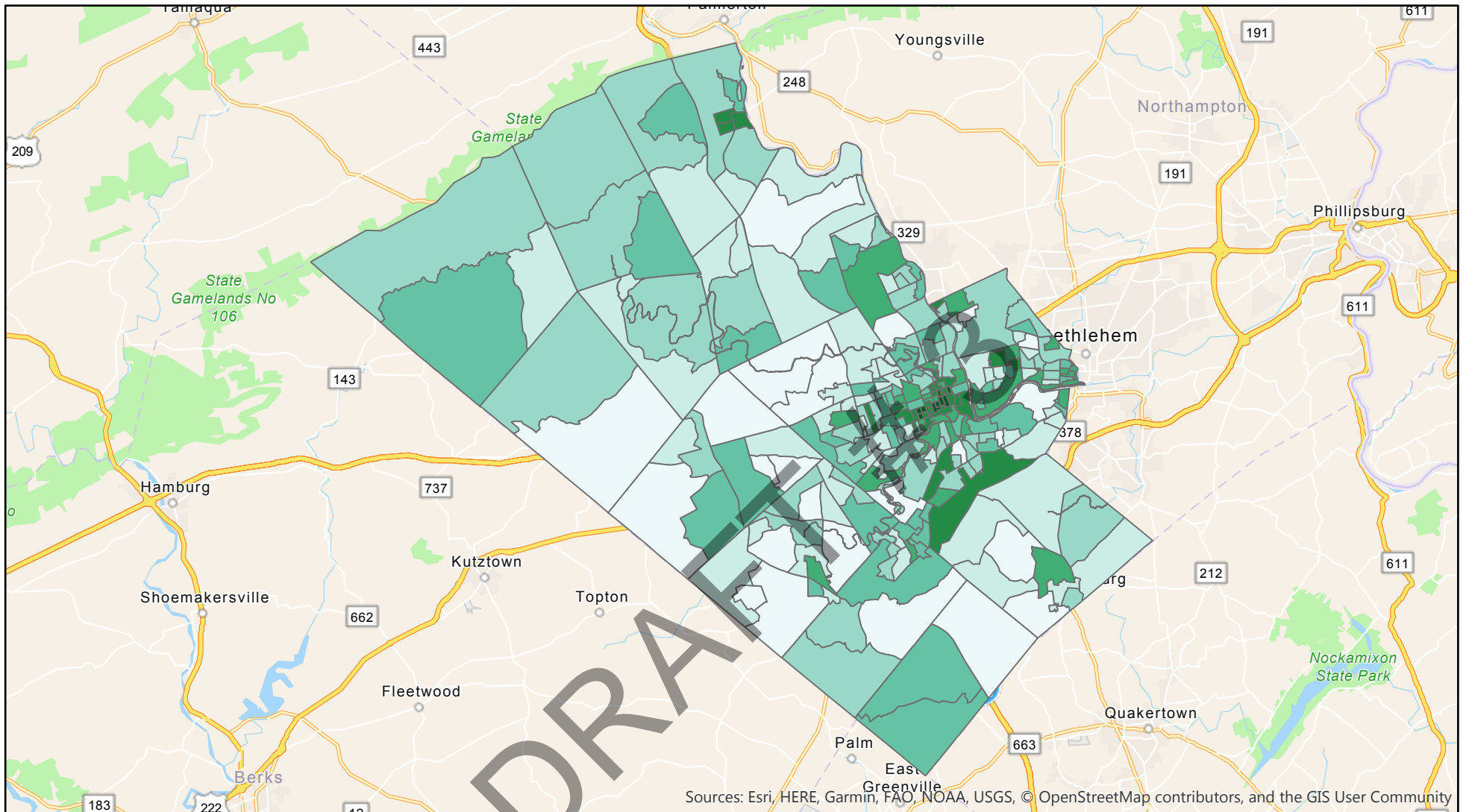




Lehigh County Census Block Group

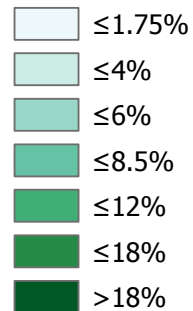
Percent Renter Occupied

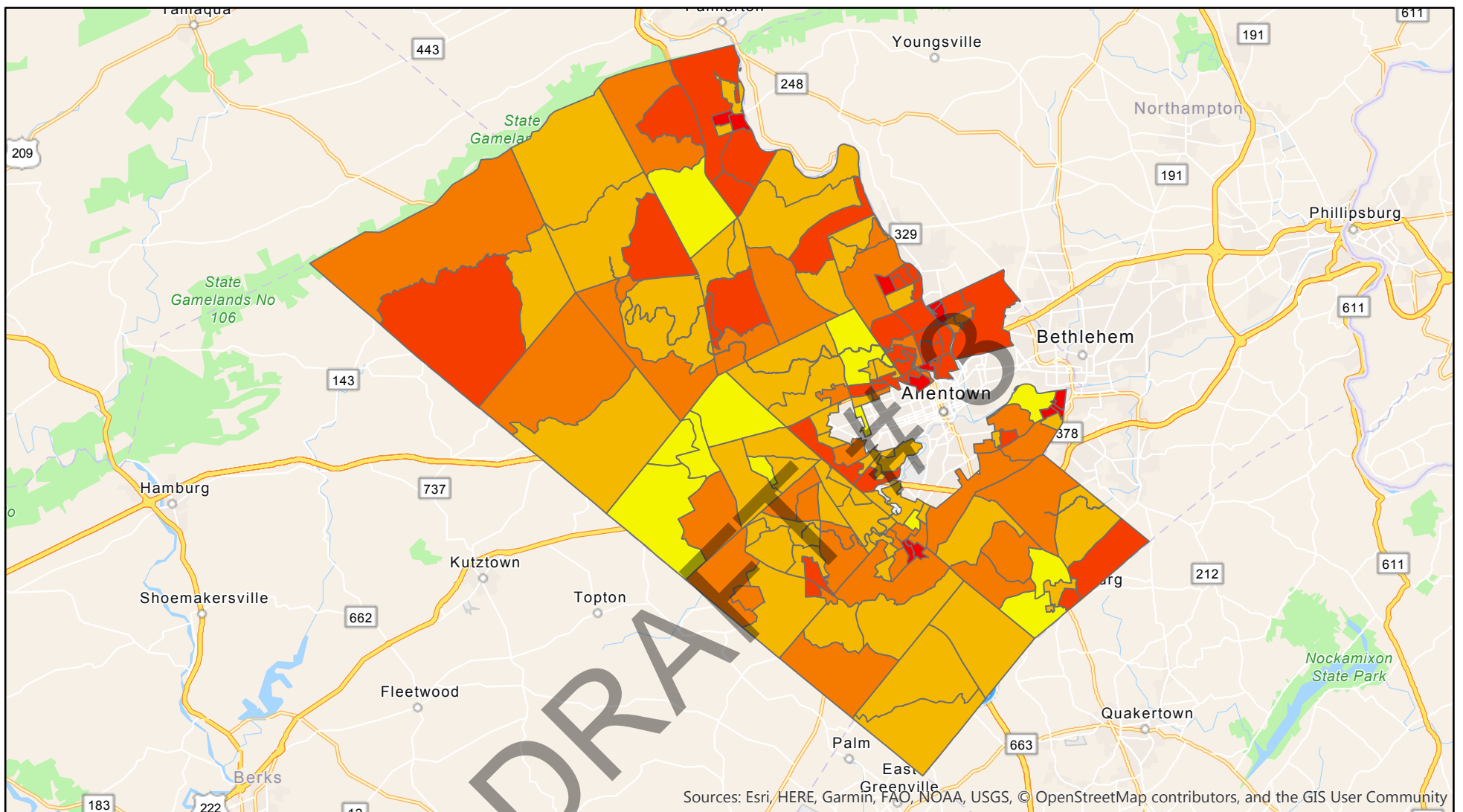




Lehigh County Census Block Group

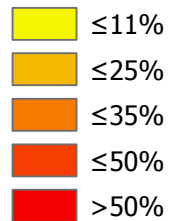
Percent Vacant

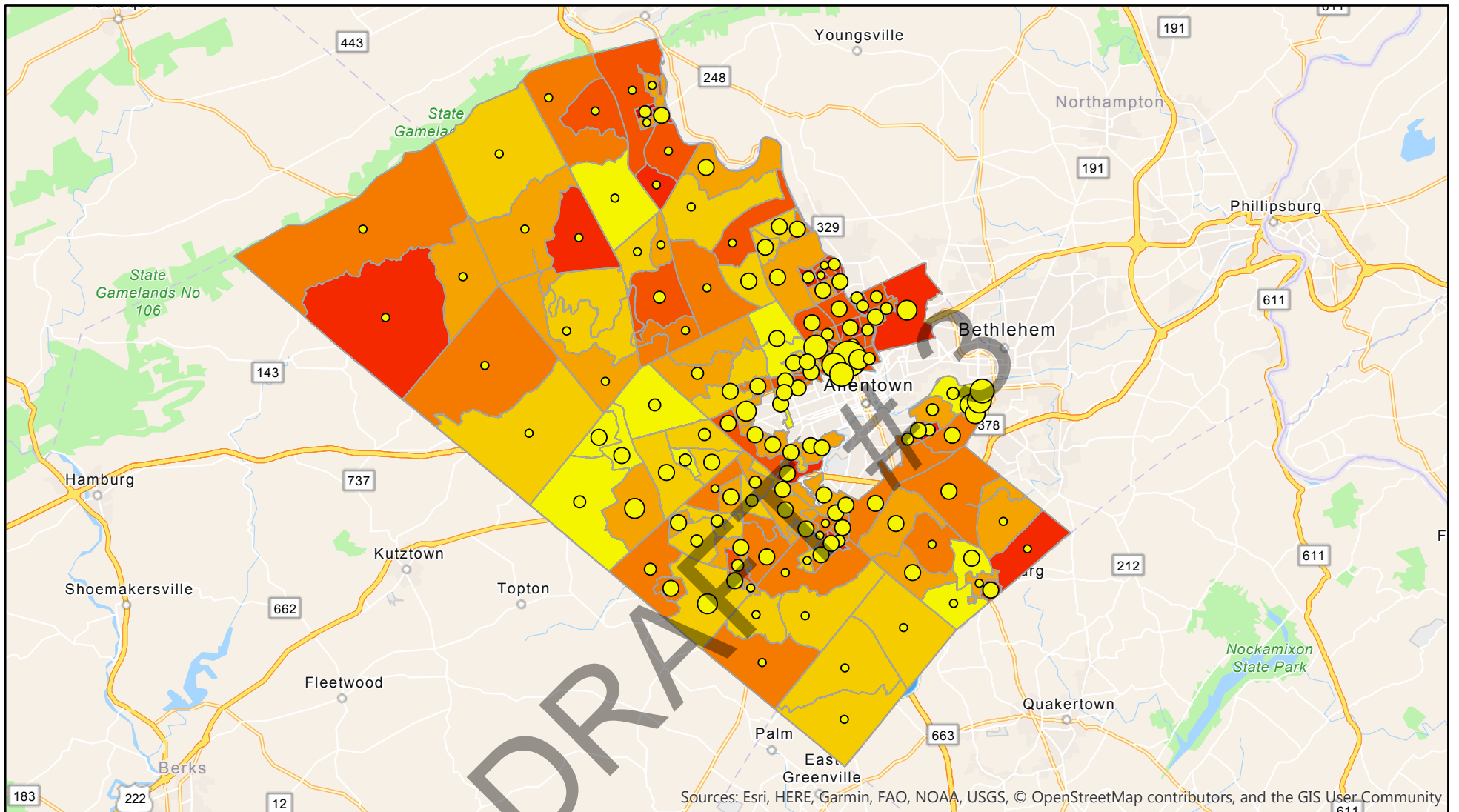




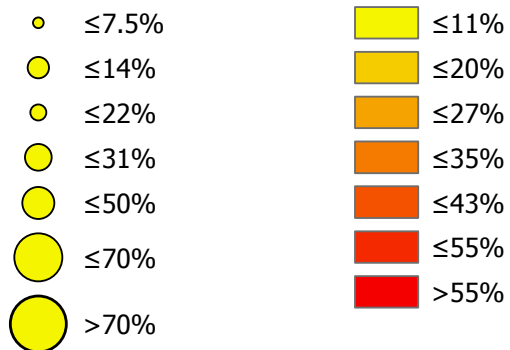
Lehigh County Census Block Groups

Low/Mod Percent

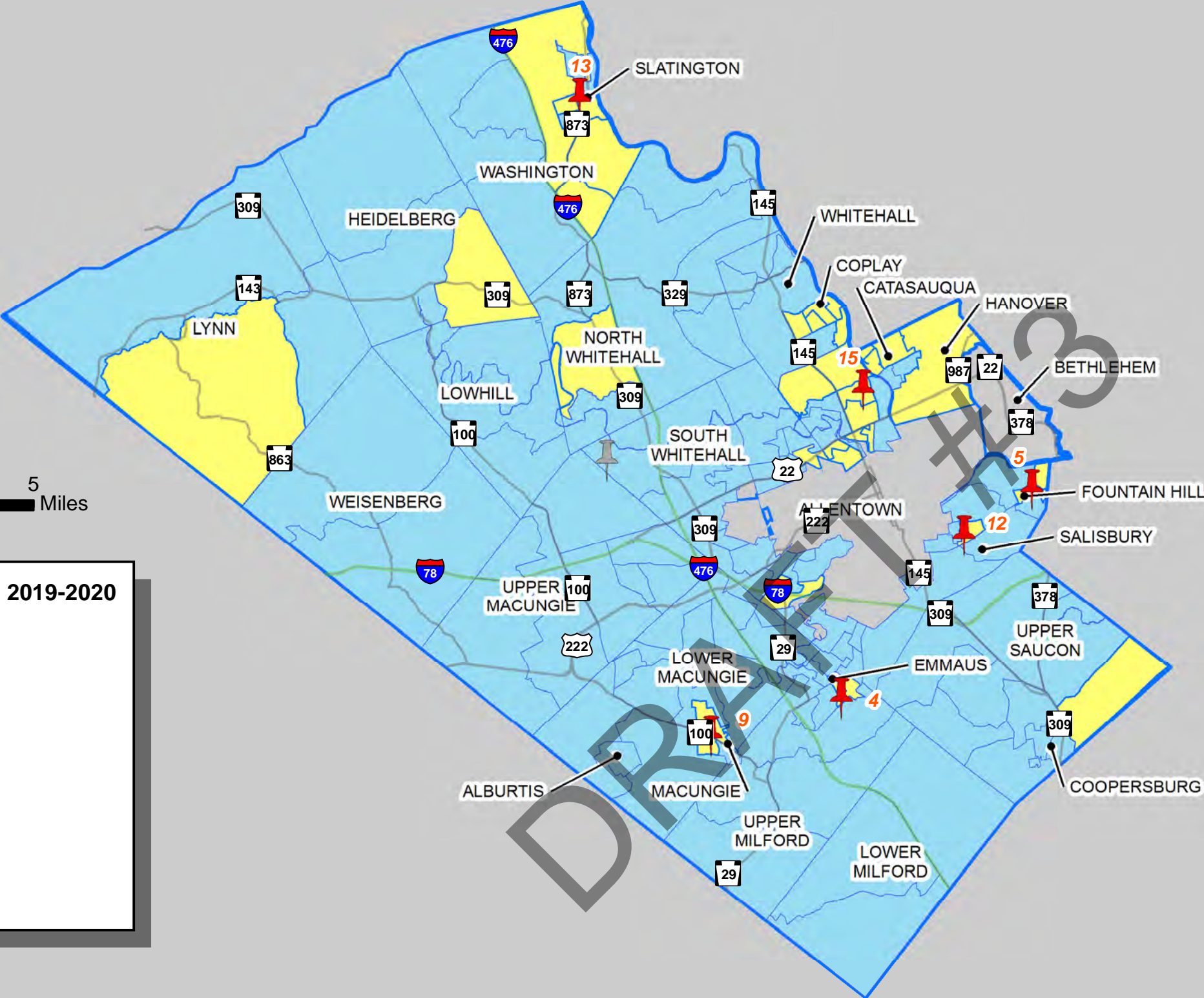
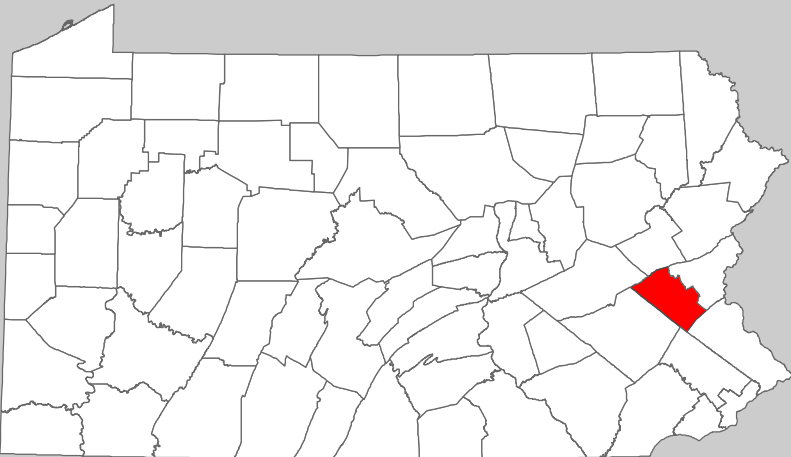




Minority Percentage Low/Mod Percent



Low to Moderate-Income by Block Groups with Project Locations



CDBG Locations 2019-2020

- Address**
- Localized
 - County-Wide

- Main Roads**
- Interstates
 - Major Highways
 - Low/Mod "No"
 - Low/Mod "Yes"

Location Specific Projects

Project ID	Project No.	Organization	Project Description
4	CD-19-04	Emmaus Borough	Curb Cuts
5	CD-19-05	Fountain Hill Borough	Street Reconstruction
9	CD-19-09	Macungie Borough	Curb Cuts
12	CD-19-12	Salisbury Township	Sanitary Sewer Rehabilitation
13	CD-19-13	Slatington Borough	Memorial Park
15	CD-19-15	Whitehall Township	Curb Cuts

County Wide Projects

Project ID	Project No.	Organization	Project Description
1	CD-19-01	Catholic Charities	Utility & Rental Assistance
2	CD-19-02	Communities in Schools of the Lehigh Valley	Case Management for At-Risk Students
3	CD-19-03	County of Lehigh	Housing Rehabilitation
7	CD-19-07	LCTI	Scholarships for LMI Section 3 Residents
8	CD-19-08	LVCIL	Housing Location Assistance
6	CD-19-06	LCCC Foundation	ESL class for communication success
10	CD-19-10	Meals on Wheels	Subsidized Meal Program
11	CD-19-11	NPLS	LMI Legal Assistance
14	CD-19-14	The Literacy Center	ESL & ABE Courses
16	CD-19-16	County of Lehigh	Administration

SF 424, SF 424D, and Certifications

FY 2019 Amendment for CDBG-CV

DRAFT #3

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☐ Application
☒ Changed/Corrected Application

* 2. Type of Application:

- ☐ New
☐ Continuation
☒ Revision

* If Revision, select appropriate letter(s):

AD: Increase Award, Decrease Duration

* Other (Specify):

* 3. Date Received:

09/11/2020

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Lehigh County

* b. Employer/Taxpayer Identification Number (EIN/TIN):

23-1663078

* c. Organizational DUNS:

0736186050000

d. Address:

* Street1:

17 South 7th Street

Street2:

* City:

Allentown

County/Parish:

* State:

PA: Pennsylvania

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

18101-2401

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Laurie

Middle Name:

* Last Name:

Moyer

Suffix:

Title:

Grants Management Specialist

Organizational Affiliation:

Department of Community & Economic Development

* Telephone Number:

610-871-1964

Fax Number:

* Email:

lauriemoyer@lehighcounty.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

US Department of Housing & Urban Development

11. Catalog of Federal Domestic Assistance Number:

CFDA Title:

* 12. Funding Opportunity Number:

CPD-19-01

* Title:

Guidance on submitting Consolidated Plans and Annual Action Plans for Fiscal Year 2019.

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Substantial amendment associated with the CARES Act.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

7th

* b. Program/Project

7th

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

05/01/2021

* b. End Date:

10/09/2023

18. Estimated Funding (\$):

* a. Federal

2,025,770.00

* b. Applicant

0.00

* c. State

0.00

* d. Local

0.00

* e. Other

0.00

* f. Program Income

0.00

* g. TOTAL

2,025,770.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name:

Phillips

Middle Name:

* Last Name:

Armstrong

Suffix:

* Title:

County Executive

* Telephone Number:

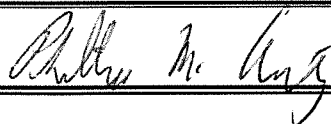
610-782-3001

Fax Number:

* Email:

philarmstrong@lehighcounty.org

* Signature of Authorized Representative:



* Date Signed:

07/28/2021

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

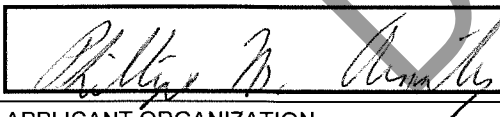
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE County Executive
APPLICANT ORGANIZATION Lehigh County	DATE SUBMITTED 09/21/2020

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.

Uniform Relocation Act and 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, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

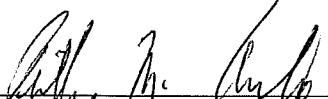
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

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 Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.


Signature of Authorized Official

09/21/2020
Date

County Executive
Title

Specific Community Development Block Grant 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 plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan 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 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 CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having 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 (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2019 [a period specified by the grantee of one, two, or three specific consecutive program years], 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.

In addition, 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.

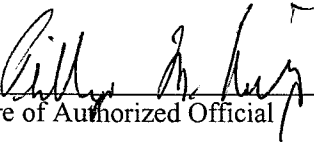
Excessive Force -- It has adopted and is enforcing:

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 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 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 of Authorized Official

9/21/2020 Date

County Executive Title

DRAFT #3

OPTIONAL Community Development Block Grant Certification

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 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 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 of Authorized Official

Date

Title

DRAFT #3

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

____NA_____
Signature of Authorized Official

Date

____NA_____
Title

DRAFT #3

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

NA
Signature of Authorized Official

Date

NA
Title

DRAFT #3

Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

NA
Signature of Authorized Official

Date

NA
Title

DRAFT #3

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

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.

DRAFT #3

SF 424 FORM

Original
Submission



Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

B-19-UC-42-0011

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Lehigh County

* b. Employer/Taxpayer Identification Number (EIN/TIN):

23-1663078

* c. Organizational DUNS:

0736186050000

d. Address:

* Street1:

17 South Seventh Street

Street2:

* City:

Allentown

County/Parish:

Lehigh County

* State:

PA: Pennsylvania

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

18101-2401

e. Organizational Unit:

Department Name:

Community and Economic Devel.

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms.

* First Name:

Laurie

Middle Name:

A.

* Last Name:

Moyer

Suffix:

Title:

Grant & Housing Manager

Organizational Affiliation:

Department of Community and Economic Development

* Telephone Number:

610-871-1964

Fax Number:

610-820-8257

* Email:

lauriemoyer@lehighcounty.org

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Community Development Block Grant (CDBG)

*** 12. Funding Opportunity Number:**

CPD-19-01

* Title:

Guidance on submitting Consolidated Plans and Annual Action Plans for Fiscal Year (FY) 2019.

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

FY 2019-2023 Five Year Consolidated Plan and FY 2019 Annual Action Plan for the Community Development Block Grant (CDBG) Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="1,216,119.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="1,216,119.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

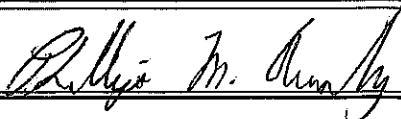
Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:

* Date Signed:

SF 424 D FORM

Original
Submission



ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

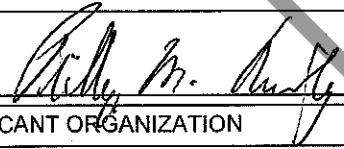
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
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15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	County Executive
APPLICANT ORGANIZATION	DATE SUBMITTED
Lehigh County, PA	08/12/2019

CERTIFICATIONS

Original
Submission



Specific Community Development Block Grant 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 plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

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1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, 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 CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having 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 (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2019, 2020, and 2021 [a period specified by the grantee of one, two, or three specific consecutive program years], 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.

In addition, 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.

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.

Uniform Relocation Act and 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, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

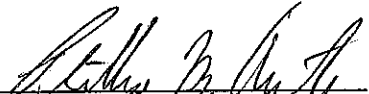
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

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 Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.


Signature of Authorized Official

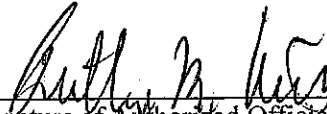
08/12/2019
Date

County Executive _____
Title

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 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 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 of Authorized Official

08/12/2019
Date

County Executive

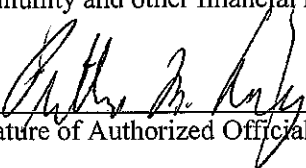
Title

DRAFT #3

OPTIONAL Community Development Block Grant Certification

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 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 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 of Authorized Official

08/12/2019

Date

County Executive

Title

DRAFT #3

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

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.

DRAFT #3