
LEHIGH COUNTY, PENNSYLVANIA

DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT

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

FY 2025 Annual Action Plan

July 31, 2025

*In Accordance with the HUD Guidelines for the
Community Development Block Grant (CDBG) and
HOME Investment Partnerships (HOME) Programs*

Frank Kane, Director
Department of Community and
Economic Development



Contents

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)	2
PR-05 Lead & Responsible Agencies – 91.200(b).....	23
AP-10 Consultation – 91.100, 91.200(b), 91.215(l).....	25
AP-12 Participation – 91.105, 91.200(c)	53
AP-15 Expected Resources – 91.220(c) (1, 2)	57
AP-35 Projects – 91.220(d)	66
AP-38 Projects Summary.....	70
AP-50 Geographic Distribution – 91.220(f).....	85
AP-55 Affordable Housing – 91.220(g)	89
AP-60 Public Housing – 91.220(h).....	90
AP-65 Homeless and Other Special Needs Activities – 91.220(i).....	92
AP-75 Barriers to affordable housing – 91.220(j)	98
AP-85 Other Actions – 91.220(k)	101
AP-90 Program Specific Requirements – 91.220(l)(1,2,3)	108



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

1. Introduction

As a Federal Entitlement, Lehigh County is required to complete an annual application for the use of the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funds to the U.S. Department of Housing and Urban Development (HUD). The Annual Action Plan is a guide to how the County will allocate its resources for specific activities that support the Goals and Objectives of Lehigh County's Five-Year Consolidated Plan. This is Lehigh County's second Annual Action Plan as a part of the FY 2024-2029 Five Year Consolidated Plan. The Five-Year Consolidated Plan describes the housing and non-housing needs of County residents and presents a five-year strategy to address those needs. The FY 2025 Annual Action Plan for Lehigh County includes the County's CDBG and HOME Programs and outlines which activities the County will undertake during the program year beginning October 1, 2025, and ending September 30, 2026. Lehigh County's Department of Community and Economic Development is the lead entity and administrator for the CDBG and HOME funds.

The FY 2025 Annual Action Plan outlines the actions to be undertaken in Fiscal Year 2025 with the Federal resources allocated to Lehigh County. The FY 2025 Annual Action Plan excludes the Cities of Allentown and Bethlehem (despite being located within Lehigh County) since they both are Federal Entitlements that receive their own CDBG and HOME allocations from HUD. The CDBG and HOME Programs and activities outlined in this FY 2025 Annual Action Plan will principally benefit low- and moderate-income persons and will provide funding to targeted areas of the County where there is the highest percentage of low- and moderate-income residents. The Annual Action Plan does not incorporate the Public Housing Authority's Comprehensive Grant (Comp Grant) into this consolidated plan and application, but the public housing authority participated in the planning process for the development of this plan.

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

Available Funds:

The following financial resources are included in the FY 2025 Annual Action Plan which the County will receive to address the priority needs and specific objectives identified in Lehigh County's Five-Year Consolidated Plan. Lehigh County will receive the following Federal funds during the FY 2025 program year:

Entitlement Funds	Amount
FY 2025 CDBG Funds	\$ 1,274,277.00
CDBG Program Income	\$ 0.00
FY 2025 HOME Funds	\$ 524,168.61
Local HOME Match	\$ 0.00
HOME Program Income	\$ 0.00
Totals:	\$ 1,798,445.61

Table 1 - Federal Resources

FY 2025 CDBG Program Budget:

Lehigh County proposes to undertake the following activities with the FY 2025 CDBG funds:

1. **Black Heritage Association of the Lehigh Valley - Section 3 Contractor and Worker Training** - \$20,000.00
2. **North Penn Legal Services - Fair Housing Outreach** - \$4,000.00
3. **CDBG Administration** - \$230,855.00
4. **Aspire - Mental Health Therapy** - \$15,000.00
5. **Big Brothers Big Sisters - Bigs Mentoring Program** - \$20,000.00
6. **Communities in Schools - LCTI Support** - \$20,000.00
7. **LVCIL - PLACE** - \$18,913.00
8. **Manito - Therapeutic Riding** - \$20,000.00
9. **North Penn Legal Services - Legal Help Project** - \$15,000.00
10. **Parkland CARES - Food Pantry** - \$12,000.00
11. **CALV - Second Harvest Food Bank** - \$32,000.00
12. **CACLV - Roof and HVAC Replacement** - \$176,000.00

- 13. Catasauqua Borough - Street Reconstruction - \$70,000.00**
- 14. Coplay Borough - Fire Equipment Replacement - \$45,379.53**
- 15. Emmaus Borough - Curb Cuts - \$100,000.00**
- 16. Fountain Hill Borough - Street Reconstruction - \$199,900.00**
- 17. Slatington Borough - Street Reconstruction - \$79,000.00**
- 18. Slatington Borough - Road Reconstruction - \$196,229.47**
- Total CDBG: \$1,274,227.00**

FY 2025 HOME Program Budget:

Lehigh County proposes to undertake the following activities with the FY 2025 HOME funds:

- 1. HOME Administration - \$44,553.61**
- 2. CHDO Set-Aside - \$78,626.00**
- 3. Soteria / Cortex - Urban Place Apartments - \$200,989.00**
- 4. Calvary Temple - Willows at Calvary - \$200,000.00**
- Total HOME: \$524,168.61**

Maps:

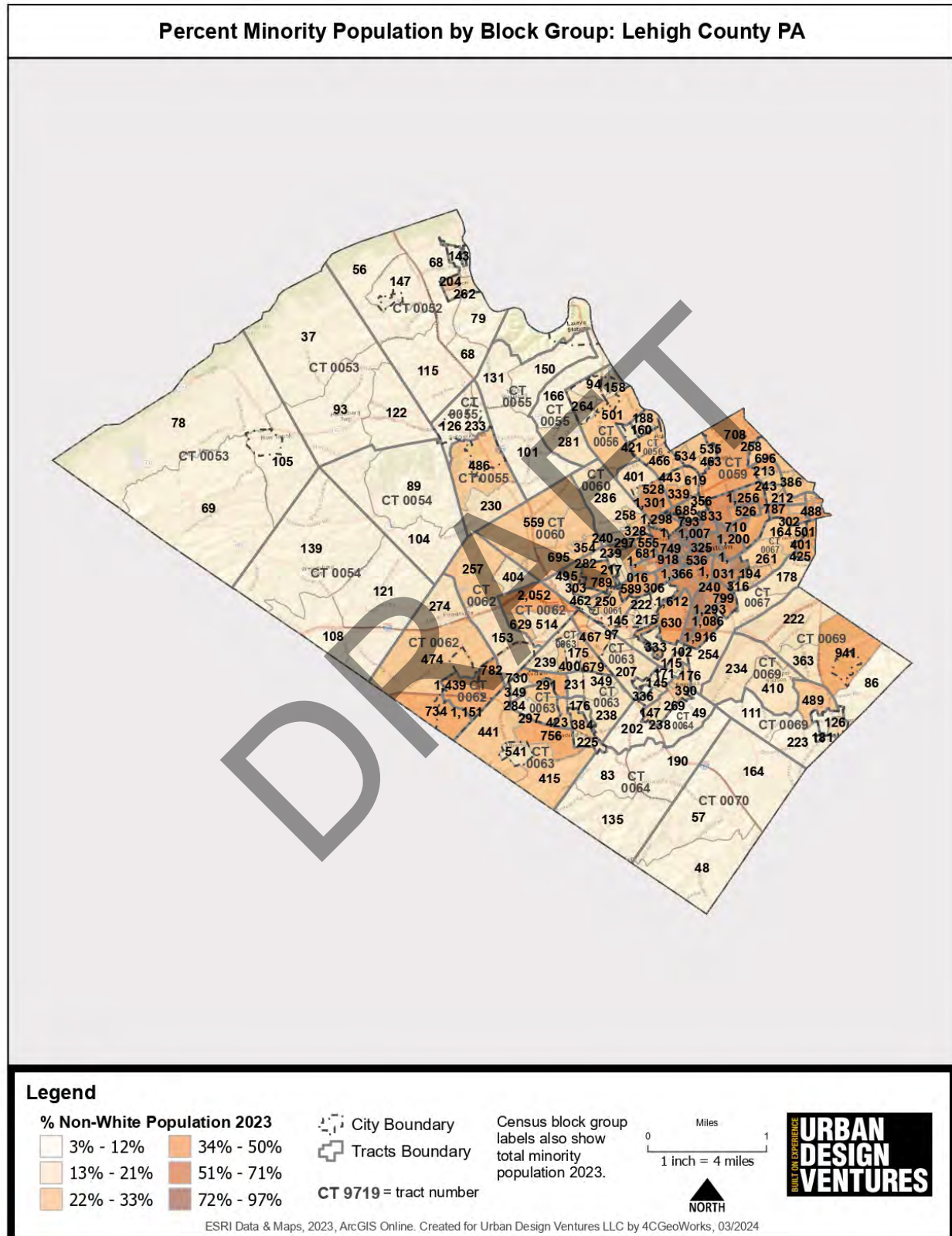
Below are the maps which illustrate the demographic characteristics of the Lehigh County:

- Percent White Population by Block Group
- Percent Minority Population by Block Group
- Percent Population Age 65+ by Block Group
- 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

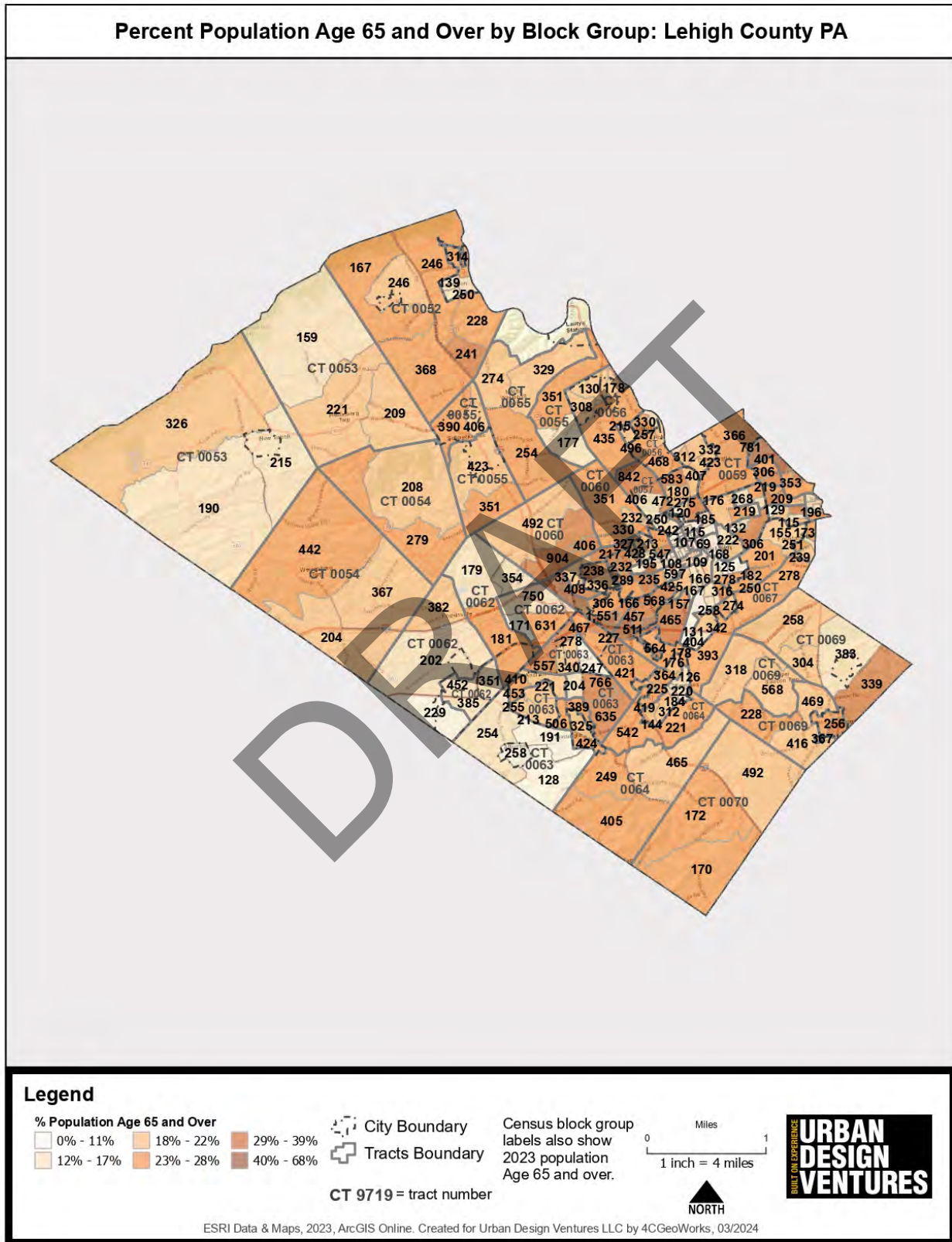
Percent White Population by Block Group



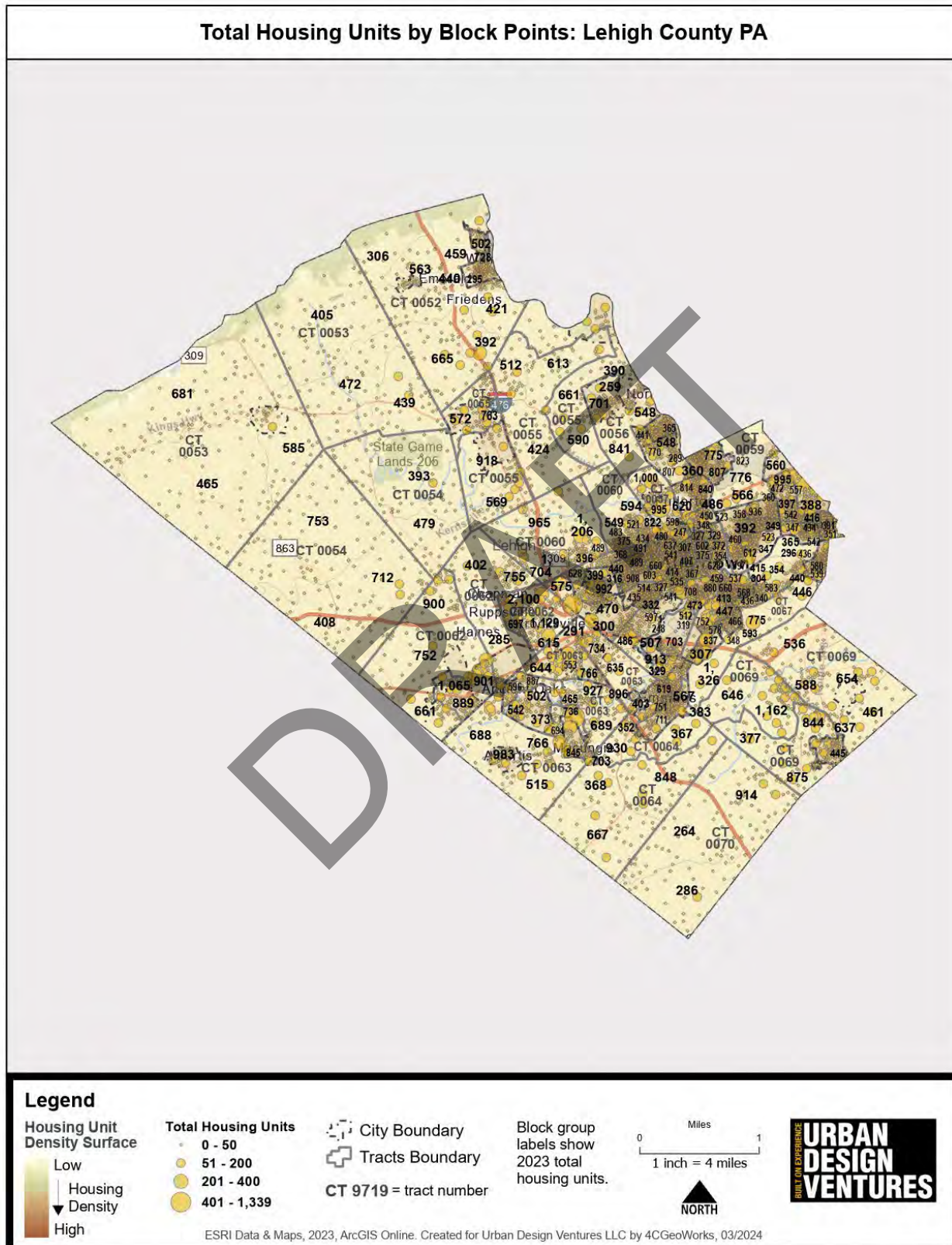
Percent Minority Population by Block Group



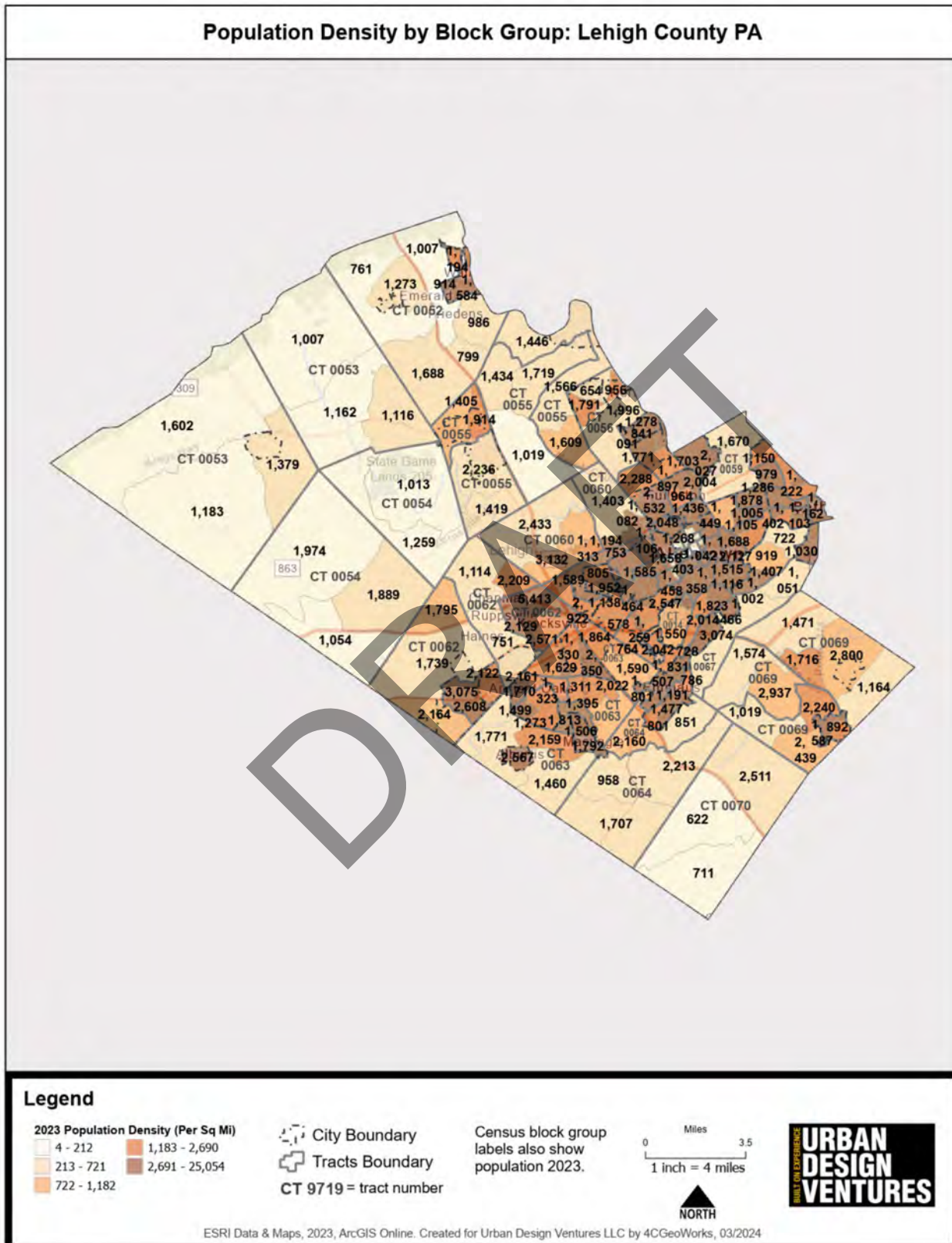
Percent Population Age 65+ by Block Group



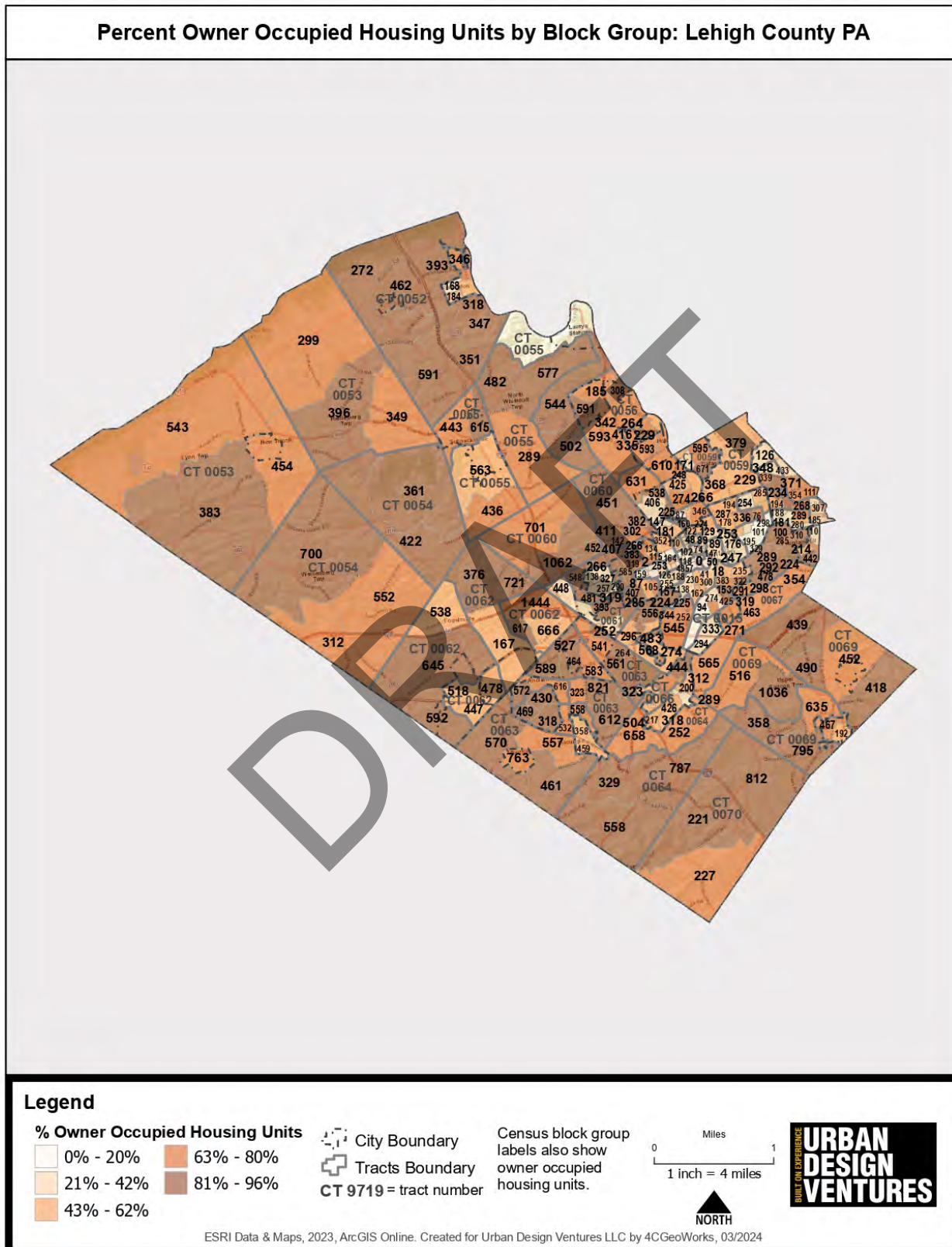
Housing Units by Block Group



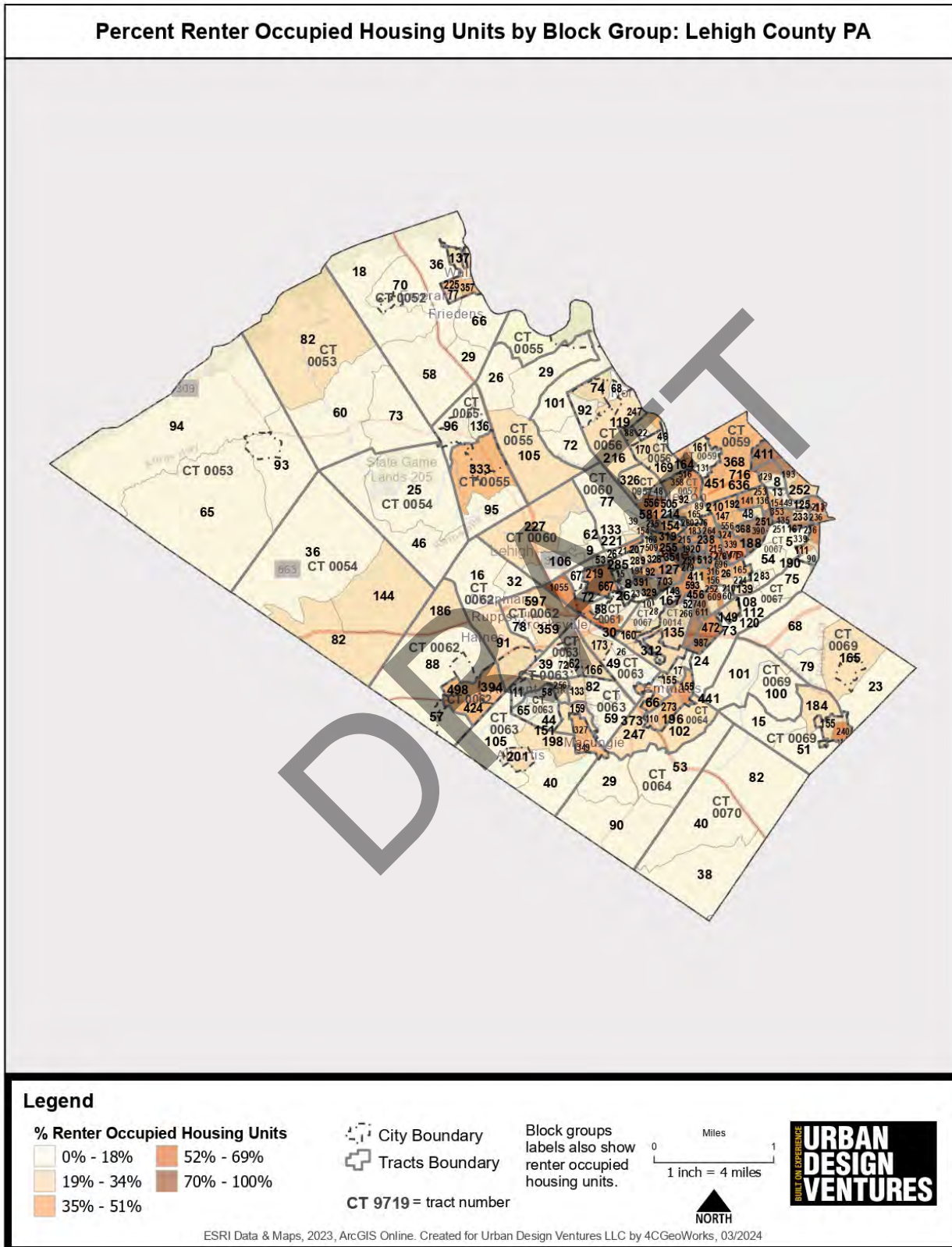
Population Density by Block Group



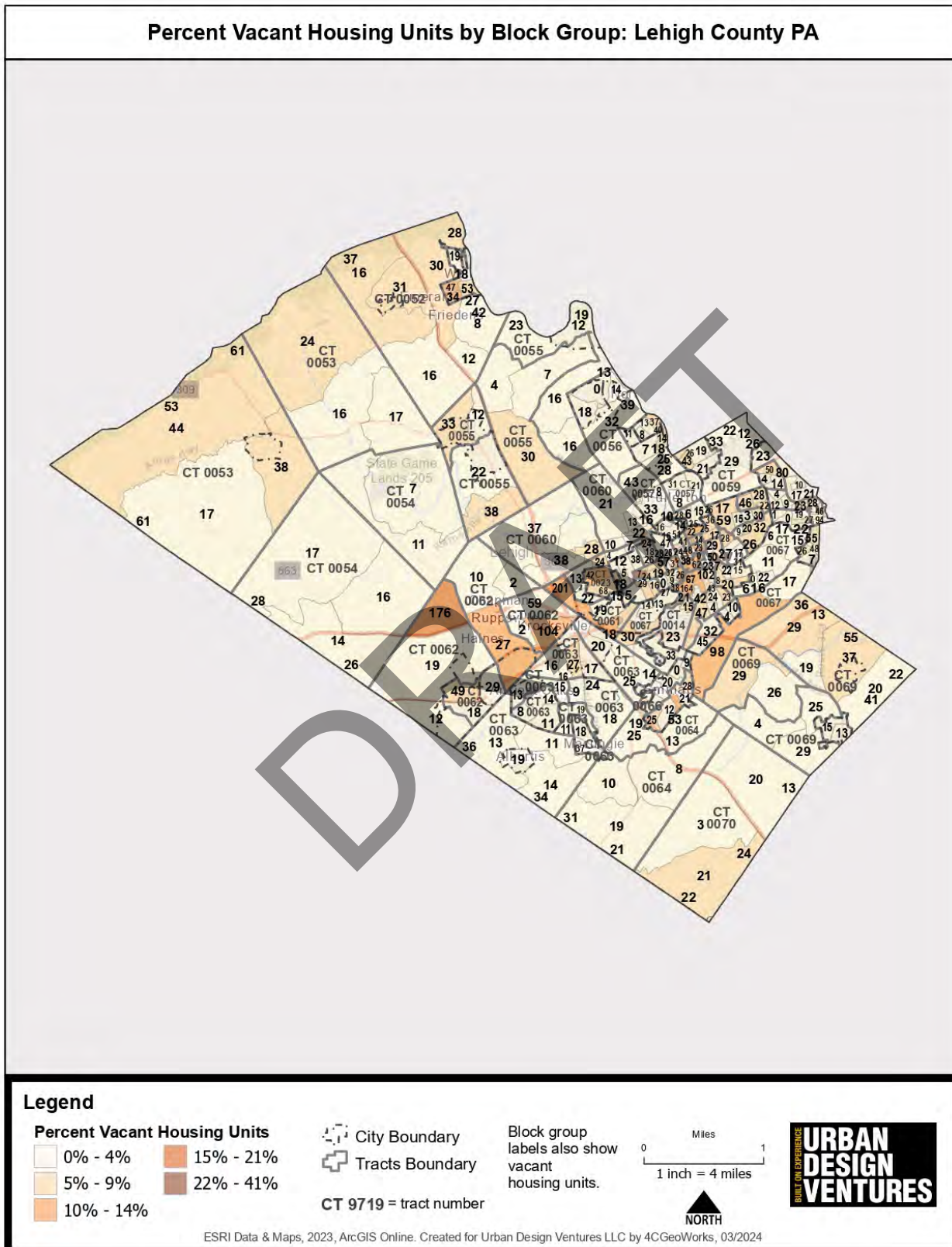
Percent Owner-Occupied Housing Units by Block Group



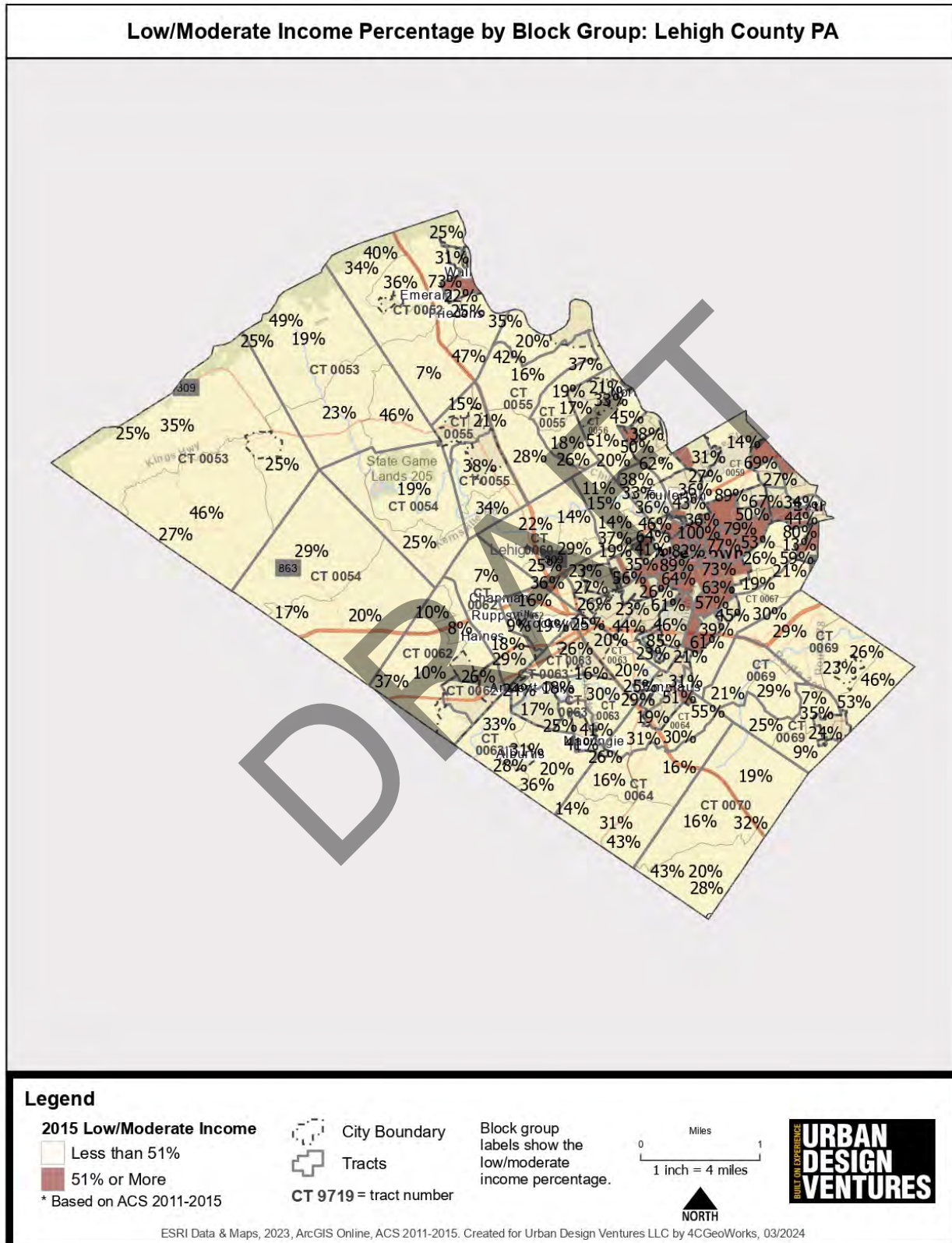
Percent Renter-Occupied Housing Units by Block Group



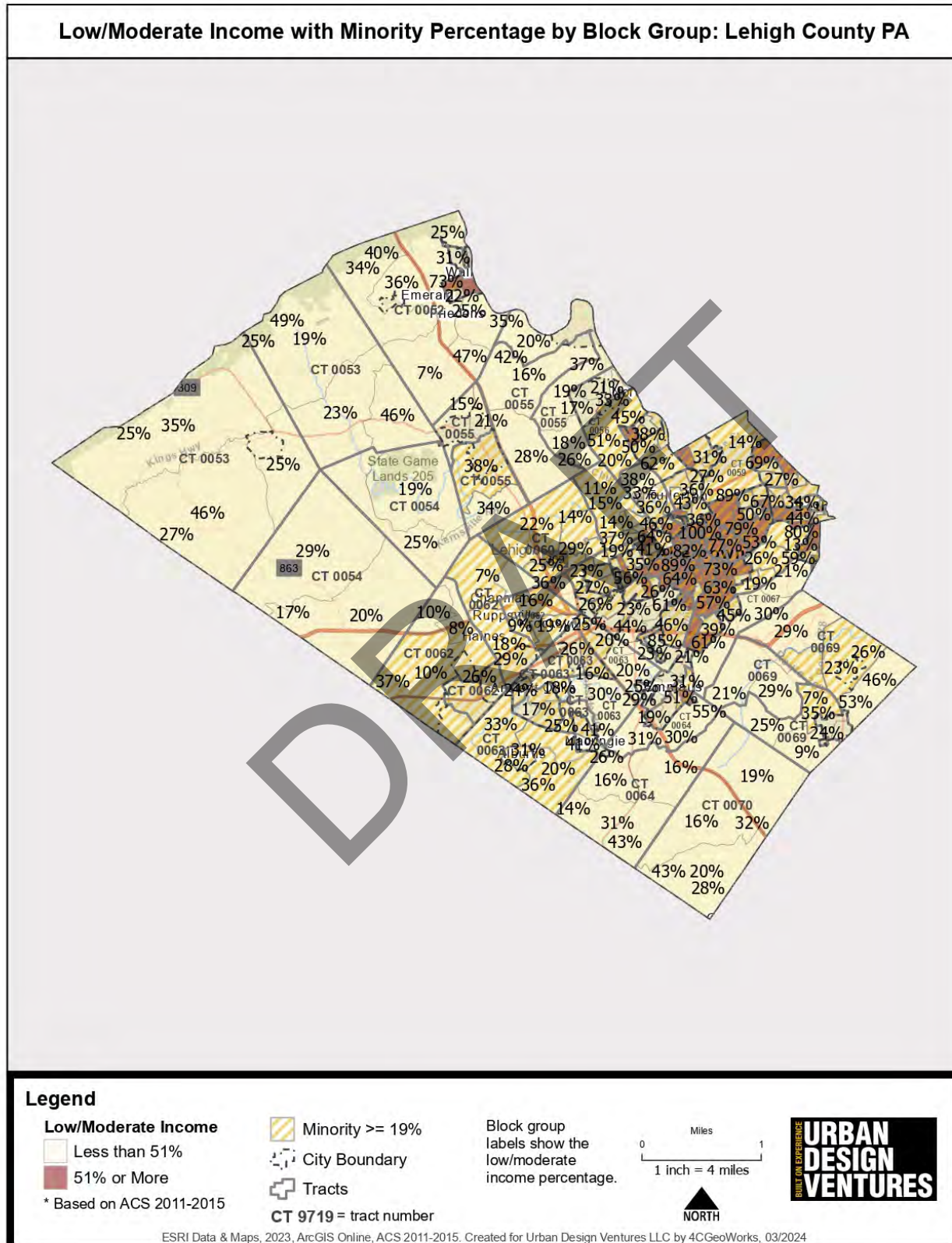
Percent Vacant Housing Units by Block Group



Low/Moderate Income Percentage by Block Group



Low/Moderate Income Percentage by Block Group with Minority Population Overlay



2. Summarize the objectives and outcomes identified in the Plan

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

The goal of Lehigh County is to improve the quality of life for County residents by funding improvements to public facilities and infrastructure, providing public services, and by retaining and increasing the supply of affordable housing units for both owner occupants and renters. During the FY 2025 CDBG and HOME Program Year, the County proposes to address the following priority need categories identified in its Five-Year Consolidated Plan:

HOUSING PRIORITY - HS

Need:

The County has been experiencing a growth in population and an influx of lower income persons which has created a housing shortage, especially affordable housing.

Objectives:

- **HS-1 Housing Development** – Increase the number of decent, safe, sanitary, accessible, and affordable housing units in the County, both for owner-occupied and rental-occupied housing.
- **HS-2 Homeownership** – Increase the opportunities for homeownership for low- and moderate-income households through downpayment/closing cost assistance, and housing counseling services.
- **HS-3 Housing Rehabilitation** – Promote and assist in the preservation of existing owner-occupied and renter-occupied affordable housing stock in the County.
- **HS-4 Rent and Utility Assistance** – Promote housing stability through rental assistance, utility payments, and deposits for low- and moderate-income tenants who are at risk of becoming homeless.
- **HS-5 Fair Housing** – Affirmatively further fair housing by promoting and informing households on their rights and educating landlords, realtors, mortgage companies, sellers, etc. on fair housing practices which will reduce discrimination in housing.
- **HS-6 Housing Supportive Services** – Promote and assist low- and moderate-income households to locate and/or remain in affordable housing through housing counseling and supportive services.

HOMELESS PRIORITY - HO**Need:**

The County is situated at the crossroads of major interstate highways and the expanding metropolitan area of the East Coast which has brought an influx of homeless and at risk of homelessness persons into the area.

Objectives:

- **HO-1 Housing Opportunities** – Increase the housing opportunities and living conditions of persons and families who are homeless or who are at risk of homelessness.
- **HO-2 Continuum of Care** – Support the efforts and resources of the Lehigh County Continuum of Care to promote housing opportunities for emergency shelters, transitional housing, and permanent supportive housing for the homeless and those who are at risk of homelessness.
- **HO-3 Support and Management Services** – Provide funding for supportive and management services to governmental and non-profit agencies and organizations to assist persons who are homeless or who are at risk of becoming homeless.
- **HO-4 Homeless Prevention** – Provide funding for programs and activities to address eviction and unfair housing practices which may contribute to homelessness

SPECIAL NEEDS PRIORITY - SN**Need:**

The County is experiencing an increase in the number of persons aging in place, the elderly, persons with physical disabilities, developmentally delayed persons, etc. There is a need to improve living standards for persons with special needs by increasing and expanding public services and public facilities.

Objectives:

- **SN-1 Housing** – Increase the number of decent, safe, sound, sanitary, accessible, and affordable units in the County for the elderly, persons with disabilities, and other special needs populations.
- **SN-2 Accessibility** – Provide funds for improvements to owner-occupied housing and improve renter-occupied housing by making reasonable accommodations for persons who are physically disabled.
- **SN-3 Social Services** – Promote and support social service programs and facilities for all persons with special needs.
- **SN-4 Removal of Architectural Barriers** – Remove Architectural Barriers which restrict the mobility and access to public facilities and services for persons with physical disabilities.

- **SN-5 Transportation** – Provide funds for improving and expanding transportation and access services for the elderly, persons with disabilities, and persons with other special needs.

COMMUNITY DEVELOPMENT PRIORITY - CD

Need:

The County's infrastructure, community facilities and public services are being strained by its population growth, increased demand for services, and the age of the infrastructure and facilities. There is a need to improve, preserve, and create public facilities and infrastructure to support the growing population.

Objectives:

- **CD-1 Community Infrastructure** – Improve and upgrade roads, bridges, utilities, sewer systems, ADA accessibility, etc. to meet the increasing demand of residents.
- **CD-2 Community Facilities** – Improve, upgrade, and expand parks, playgrounds, recreational facilities, libraries, public buildings, etc. to meet the needs of the population.
- **CD-3 Public Services** – Provide funding to improve, expand, and create public services for social and welfare programs so they are available to meet the needs of low- and moderate-income residents in the County.
- **CD-4 Food Programs** – Provide assistance for food and nutritional programs to address the needs of the unemployed, underemployed, elderly, disabled, and homeless individuals.
- **CD-5 Clearance/Demolition** – Remove slum and blighting conditions through the demolition and clearance of buildings and sites that pose a threat to the health, safety, and welfare of surrounding residents.
- **CD-6 Public Safety** – Provide funding to improve and expand fire protection, emergency health and management services, crime prevention, etc. to better serve the residents of the county.
- **CD-7 Transportation** – Improve and expand public transportation with additional bus routes, improved bus shelters, increased time schedules, etc. to assist low- and moderate-income persons to access employment sites, medical treatment and essential services.

ECONOMIC DEVELOPMENT PRIORITY - EDS

Need:

The local economy in the County has been expanding, however, there is a need for job training and services to meet the employment needs of companies.

Objectives:

- **ED-1 Employment** – Provide funding to support job training, retention, and educational programs to address the need for a well trained labor force.
- **ED-2 Financial Assistance** – Provide funds for new development, expansion, and equipment purchases through economic development programs.
- **ED-3 Revitalization** – Provide assistance in acquiring land and making sites available for redevelopment to promote new development in areas of the County that need to be revitalized.
- **ED-4 Incentives** – Support local, state, and federal tax breaks, tax credits, development bonuses and planning initiatives to create orderly and positive economic development throughout the County.
- **ED-5 Coordination and Cooperation** – Promote, support and form public and private partnerships to improve employee access to jobs through public transportation and the supply of worker housing throughout the County.

ADMINISTRATION, PLANNING, AND MANAGEMENT PLANNING - AMP

Need:

There is a need for administration, management, and planning services to efficiently and effectively operate federal and state grant programs.

Objectives:

- **AMP-1 General Administration** – Provide experienced management and oversight to maintain efficient and effective administration of the federal and state grant programs.
- **AMP-2 Staffing** – Hire and retain professional staff and support personnel to provide efficient and sound management of the programs and activities.
- **AMP-3 Planning** – Provide planning for special studies, environmental review records, fair housing choice activities, promoting Section 3 enterprises, training and outreach, and compliance with federal, state and local laws and ordinances.

3. Evaluation of past performance

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

Lehigh County has a good performance record with HUD and regularly meets its established performance standards. Each year the County prepares a Consolidated Annual Performance and Evaluation Report (CAPER). This report is submitted to HUD within ninety (90) days after the start of the next program year. Copies of the FY 2023 CAPER are available for review at the Lehigh County Department of Community and Economic Development Offices and also on the County website. The FY 2023 CAPER, which was the fifth CAPER for the FY 2019-2023 Five Year Consolidated Plan, was submitted and approved by HUD. In the FY 2023 CAPER, Lehigh County

expended 100% of its CDBG funds to benefit low- and moderate-income persons. This was the second year of a multi-year Low/Mod Benefit Certification. The multi-year certification is at 94.80%. The County expended/obligated 11.10% of its funds during the FY 2023 CAPER period on public services, which is below the statutory maximum of 15%. The County expended/obligated 19.04% of its funds during this CAPER period on Planning and Administration, which is below the 20% regulatory cap. As of the 2023 CAPER, Lehigh County was under the required 1.5 maximum drawdown ratio with a ratio of 1.42 as of November 20, 2024.

The HOME program is also administered by Lehigh County and is in accordance with applicable activity initiation and match requirements.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

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

Each item of the plan primarily benefits the low- and moderate-income population in Lehigh County. Lehigh County has an approved Citizen Participation Plan, as required by HUD, which is on file with HUD and at the Lehigh County Department of Community and Economic Development. The County abided by its Citizen Participation Plan in the preparation and development of the FY 2025 Annual Action Plan.

The first step of the planning process for the FY 2025 Annual Action Plan started with the distribution of applications for CDBG and HOME funds. On Thursday, February 27, 2025, the Department of Community and Economic Development distributed the FY 2025 Requests for Funding to local municipalities and non-profit agencies/organizations. These were due back to the County on Tuesday, April 15, 2025. Information was also available on the Lehigh County Department of Community and Economic Development's website.

The County held two (2) public hearings to obtain resident input on the needs of Lehigh County. The needs public hearing notice was published on Friday, March 14, 2025, in "The Morning Call," and the needs public hearing notice was posted on the County's website, and emails were sent to local municipalities and non-profit agencies/organizations. The first session of the first needs hearing was held on Tuesday, March 25, 2025, at 3:00 PM over zoom. The second session of the first needs hearing was held on Thursday, March 27, 2025, at 10:00 AM in Room 524 located at 17 South Seventh Street, Allentown, PA. At these public hearings, residents had the opportunity to give their input and their thoughts on the housing, community development, and economic development needs in Lehigh County and how the funds should best be spent to benefit low- and moderate-income persons.

The Final Public Hearing Notice was published on Monday, June 30, 2025. At the Public Hearing, held on Tuesday, July 15, 2025 at 12:00 PM, the residents were given the opportunity to comment on the "draft" version of the FY 2025 Annual Action Plan and which projects/activities would be funded with FY 2025 CDBG and HOME funds.

The FY 2025 Annual Action Plan was on public display beginning July 1, 2025, through July 31, 2025, at the following locations in the County and on the County's website (<http://www.lehighcounty.org/>):

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

The following schedule was used in the preparation of the FY 2025 Action Plan:

- **February 27th** – 2025 CDBG and HOME applications are available on website
- **March 14th** – Ad runs for public comment period / 1st public hearing
- **March 25th** – 1st Public Hearing, Session 1, 3:00 pm, Zoom
- **March 27th** – 1st Public Hearing, Session 2, 10:00 am, Room 524
- **April 15th** – Project application submission deadline
- **June 30th** – Ad runs for public comment period / 2nd public hearing
- **July 1st** – Draft Annual Action Plan on display
- **July 15th** – 2nd Public Hearing, 12:00 pm, Room 524
- **July 31st** – Draft Annual Action Plan off display
- **August 15th** – Submission to HUD
- **October 1st** – Program Year Begins

5. Summary of public comments

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

Lehigh County recorded public comments at the two (2) public hearings on the needs of the County.

- **Tuesday, March 25, 2025** – There were twenty-six (26) participants and two (2) Lehigh County DCED staff members at the public needs hearing. A meeting summary can be found in the Appendices. All comments were accepted.
- **Thursday, March 27, 2025** - There was one (1) participants and one (1) Lehigh County DCED staff members at the public needs hearing. A meeting summary can be found in the Appendices. All comments were accepted.

The Final public hearing on the Draft version of the FY 2025 Annual Action Plan was held on Tuesday, July 15, 2025.

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

All of the previous comments were accepted, and the requests for funding were incorporated into the FY 2025 CDBG and HOME Programs. Of the twenty-seven (27) funding applications received for FY 2025, nineteen (19) were funded.

There was one (1) funding applications that were not approved for FY 2025 funds.

One (1) of the projects was not funded due to the street (Strawberry Street) not being a primary residential street.

One (1) of the projects was not funded due to multiple issues. Requested \$125,000 for public services. Current services primarily provided to Allentown residents. Application was submitted at 12:01 am on 4/16 (technically late). Requested clarification, subset of requested services, narrowed down budget with a response by noon on May 1st. No response.

One (1) of the projects was not funded due to multiple issues. Requested \$125,000 for public services although application was to expand facility AND services at 221 N. 7th Street in Allentown. Requested clarification, subset of requested services, narrowed down budget with a response by noon on May 1st. No response.

One (1) of the projects was not funded due to multiple issues. Requested \$30,000 for public services. Requested clarification on whether the program was new or if there was a quantifiable increase in need. Requested a narrowed down budget Set a response deadline of noon on May 1st. No response until 5/6. Since this project is a workforce development program, which is an undermet need of the CP, I offered to review a pared down, focused application. An application for \$30,000 was submitted. I attempted to fit in a grant for \$10,000 but I would have to further cut down proposed awards for grants submitted on time.

Lastly, one (1) of the projects was not funded due to the project not being prepared for federal funding.

7. Summary

The FY 2025 Annual Action Plan for Lehigh County includes the County's CDBG and HOME Programs and outlines which activities the County will undertake during the program year beginning October 1, 2025, and ending September 30, 2026. This is the County's fifth year of its Five-Year Consolidated Plan.

During the FY 2025 Program Year, Lehigh County, Pennsylvania anticipates the following Federal financial resources:

• FY 2025 CDBG Funds	\$ 1,274,277.00
• CDBG Program Income	\$ 0.00
• FY 2025 HOME Funds	\$ 524,168.61
• Local HOME Match	\$ 0.00
• HOME Program Income	\$ 0.00
Total:	\$ 1,798,445.61

During the FY 2025 CDBG and HOME Program Years, Lehigh County proposes addressing the following priority need categories from its Five-Year Consolidated Plan:

- Housing Strategy;
- Homeless Strategy;
- Community Development Strategy; and
- Administration, Planning, and Management Strategy.

A “draft” of the FY 2025 Annual Action Plan was placed on display at the Lehigh County Government Center and on the County’s website (<http://www.lehighcounty.org/>), which is at the location of the Department of Community and Economic Development offices located at 17 South Seventh Street, Allentown, PA, as well as eight (8) regional libraries for public review. The display period started on Tuesday, July 1, 2025, through Thursday, July 31, 2025, for a 30-day display period. A Final Public Hearing was held on Tuesday, July 15, 2025, to discuss the proposed activities and solicit citizen comments. Upon completion of the 30-day comment period, Lehigh County will submit the FY 2025 Annual Action Plan to the U.S. Department of Housing and Urban Development Philadelphia Office on or before Friday, August 15, 2025.

PR-05 Lead & Responsible Agencies – 91.200(b)**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

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

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

Table 2 – 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 six (6) staff members, along with a planning consulting firm to assist with the oversight and compliance for the CDBG, HOME, and housing programs. The Department of Community and Economic Development prepares the Five Year Consolidated Plan, Annual Action Plans, Environmental Review Record (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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DRAFT

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

While preparing the FY 2025 Annual Action Plan, Lehigh County consulted with the Lehigh County Housing Authority, local municipalities, non-profit agencies/organizations, and members of the Eastern Pennsylvania CoC - Lehigh Valley Regional Homeless Advisory Board, which includes the following two (2) counties: Lehigh and Northampton.

The Eastern Pennsylvania CoC serves and acts as the oversight and planning body for preventing and ending homelessness for the CoC general membership body. Lehigh County is a member of the Lehigh Valley Regional Homeless Advisory Board (LV-RHAB) under the Eastern PA CoC. The Board comprises a diverse set of representative stakeholders throughout Lehigh and Northampton Counties. The Board sets policy based on the knowledge and experience of its members. The Board also sets priorities and makes funding decisions.

Other members of the Board consist of the social service agencies, shelter providers, etc. that serve residents in the region. Coordination of the programs and funds is accomplished by the CoC Board for the chronically homeless individuals and families, families with children, veterans, and unaccompanied youth, along with the administration of the HMIS System.

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

Lehigh County works with the following agencies to enhance coordination:

- **Lehigh County Department of Community and Economic Development** - oversees the CDBG and HOME programs.
- **Lehigh County Housing Authority** - oversees the Section 8 Housing Choice Voucher Program, improvements to public housing communities, and the development of scattered site affordable housing.
- **Social Services Agencies** - the County provides funds to address the needs of low- and moderate-income persons.
- **Housing Providers** - the County provides funds to rehabilitate and develop affordable housing for low- and moderate-income families and individuals.
- **Lehigh Valley Regional Homeless Advisory Board** - oversees the Continuum of Care Network for Eastern Pennsylvania CoC - Lehigh Valley Regional Homeless Advisory Board for the following counties: Lehigh and Northampton.

A part of the CDBG and HOME application planning process, local agencies, organizations, and municipalities were invited to submit proposals for CDBG and HOME funds for eligible activities.

These groups participate in the planning process by attending the public hearing and submission of funding applications.

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.

Lehigh County is a member of the Lehigh Valley Regional Homeless Advisory Board (LV-RHAB) under the Continuum of Care Network for Eastern Pennsylvania (Eastern PA CoC). The Eastern PA CoC is administered by the Pennsylvania Department of Community and Economic Development (PA-DCED). Lehigh County's Department of Community and Economic Development staff attends the local CoC meetings and acts as the County's representative. The County coordinates its activities with the Continuum of Care and supports its applications for funds. The County helps the Eastern Pennsylvania CoC to address homelessness by working together to develop a framework to deliver housing and services to the homeless.

The RHAB identifies regional and local homeless issues; coordinates regional planning; identifies regional housing gaps and needs, strategies, and priorities; provides input for Supportive Services for Veteran Families (SSVF) and Emergency Solutions Grants (ESG) applications; participates in completion of the CoC application; monitors Homeless Management Information Systems (HMIS) participation and implementation; and coordinates and follows-up on the Point-In-Time (PIT) count and Annual Homeless Assessment Report (AHAR). Lehigh County is a member of the Lehigh Valley Regional Homeless Advisory Board (RHAB), which also includes Northampton County. Many of the homeless resources in Lehigh and Northampton Counties are utilized by residents of both Counties. The Lehigh Valley RHAB Co-Chairs are currently representatives of Catholic Charities in Allentown, PA, which is located in Lehigh County and the Third Street Alliance in Easton, PA, which is located in Northampton County.

The CoC solicits and considers a wide range of opinions through the five (5) Regional Homeless Advisory Boards' (RHABs) monthly meetings and semi-annual full CoC meetings. Both forums provide opportunities for persons to provide input and assistance in ending homelessness. The RHAB Chairs represent multiple interest groups including: CDBG Jurisdictions, Public Housing Authorities, domestic violence service providers, Veterans, youth service providers, Community Action Partnerships (CAP), homeless service providers, and faith-based organizations.

Most of the Eastern PA CoC comes under the State Consolidated Plan developed by PA-DCED, however, there are twelve (12) additional Consolidated Plan Jurisdictions representing the more populated areas of the Lehigh Valley and surrounding Counties, plus cities. PA-DCED uses web-based forums to meet with Regional Housing Advisory Committees (RHACs). RHAC meetings are held annually and generally last two (2) hours. The RHACs include state grantees, housing officials,

developers, non-profits, CoC Chairs, and PA-DCED staff. Also, as part of the citizen participation process, members of the CoC receive notice of public meetings, documents available for review, and citizen comment periods. The County's Consolidated Plan Jurisdictions follow the Consolidated Plan guidelines for consultation, including interviews, surveys, and focus groups with stakeholders knowledgeable about homelessness in their communities.

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

Most of the Eastern PA CoC ESG funding is allocated by PA-DCED. The CoC participated in developing priorities, target populations, outcome measures, and evaluation processes for ESG under HEARTH, including prioritizing Rapid Re-Housing (RRH) for 45% of funds (excluding emergency shelters, outreach, and administration). Since then, the CoC has provided input on ESG funding decisions and project scoring based on knowledge of projects, capacity of applicants and participation in CoC planning. PA-DCED, as the Collaborative Applicant and HMIS Lead, has access to Point-in-Time and Homeless Management Information System (HMIS) data. PA-DCED convened a Data Committee composed of CoC members to review and analyze quarterly CoC performance reports for establishing benchmarks and data driven performance standards for outcome evaluation and funding decisions.

The CoC finalized a Monitoring Plan in June 2017 which sets performance standards and outlines a process for evaluating the outcomes of projects receiving both CoC and ESG funding. This process will be carried out by the CoC's Data Committee, the five RHABs, and the Governing Board.

The CoC and the HMIS Lead work together to assess data quality throughout the CoC. This includes working on Annual Homeless Assessment Report (AHAR) submission, the PIT count, project review/ranking, and working with individual programs while completing their Annual Performance Reports (APRs). The CoC continues to work toward increasing the bed coverage percentage in HMIS. According to the Eastern PA CoC, the largest overall barrier to HMIS-participation remains non-HUD funded volunteer and faith-based operated projects and VA-funded projects, such as VASH. Additional outreach to volunteer and faith-based organizations will occur through the implementation of coordinated entry. Increased engagement and education among these groups should lead to increased HMIS participation. The CoC will work with Veterans to improve participation among VA-funded projects.

In addition, the CoC works closely with the HMIS Lead Agency on the HMIS policies and procedures. Specifically, many system modifications have been made in order to create the infrastructure for implementation of Coordinated Entry.

The HMIS Lead Agency maintains the CoC's Governance Charter for HMIS, the HMIS Privacy and Security Plan, the HMIS Data Quality and Functionality Plan, and the MOU with the CoC. These documents are reviewed and approved by the CoC's Governing Board.

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

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 Health Agency Child Welfare Agency Other government – County Planning organization Civic Leaders Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Lead-based Paint Strategy Anti-poverty Strategy Community Development 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 coordinated the FY2025 Annual Action Plan process. Lehigh County department staff and elected officials were contacted to determine the needs for the County.
2.	Agency/Group/Organization	Alburtis Borough
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Alburtis Borough was contacted to determine the needs for the Borough.
3.	Agency/Group/Organization	Catasauqua Borough
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Catasauqua Borough was contacted to determine the needs for the Borough. The Borough submitted a funding request for road reconstruction. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Annual Action Plan.
4.	Agency/Group/Organization	Fountian Hill Borough
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Fountian Hill was contacted to determine the needs of the Borough. The borough submitted a funding request for street reconstruction; they were funded in 2025.
5.	Agency/Group/Organization	Coplay Borough
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Coplay Borough was contacted and submitted a request for funding for the replacement of fire equipment. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Annual Action Plan.
6.	Agency/Group/Organization	Emmaus Borough
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Emmaus Borough was contacted and submitted a request for funding for curb cuts. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Annual Action Plan.
7.	Agency/Group/Organization	Macungie Borough
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Macungie Borough was contacted to determine the needs of the Borough.
8.	Agency/Group/Organization	Slatington Borough
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Slatington Borough was contacted and submitted two (2) requests for funding for road reconstruction and street reconstruction. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Annual Action Plan.
9.	Agency/Group/Organization	Lower Macungie Township
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lower Macungie Township was contacted to determine the needs for the Township.
10.	Agency/Group/Organization	North Whitehall Township
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	North Whitehall Township was contacted to determine the needs for the Township.
11.	Agency/Group/Organization	Salisbury Township
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Salisbury Township was contacted and submitted a request for funding for sanitary sewer rehabilitation. The County reviewed the application and decided not to fund the activity because it did not meet the goals and objectives as outlined in the County's Annual Action Plan.
12.	Agency/Group/Organization	South Whitehall Township
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	South Whitehall Township was contacted to determine the needs for the Township.
13.	Agency/Group/Organization	Upper Macungie Township
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Upper Macungie Township was contacted to determine the needs for the Township.
14.	Agency/Group/Organization	Whitehall Township
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Whitehall Township was contacted to determine the needs for the Township.
15.	Agency/Group/Organization	Upper Milford Township
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Upper Macungie Township was contacted to determine the needs for the Township.
16.	Agency/Group/Organization	Washington Township
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Washington Township was contacted to determine the needs for the Township.
17.	Agency/Group/Organization	Weisenberg Township
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Weisenberg Township was contacted to determine the needs for the Township.
18.	Agency/Group/Organization	Upper Saucon Township
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Upper Saucon Township was contacted to determine the needs for the Township.
19.	Agency/Group/Organization	Allentown Housing Authority
	Agency/Group/Organization Type	Housing PHA Services-Housing Services-Fair Housing Other government-Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Allentown Housing Authority was contacted to determine the public housing needs of Allentown and cooperative strategy with the County and the LCHA.
20.	Agency/Group/Organization	Family Promise
	Agency/Group/Organization Type	Services-Children Services-Education Civic Leaders Regional organization
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Family Promise was contacted and provided information on the needs of the youth and low-mod population in the Lehigh Valley
21.	Agency/Group/Organization	LVCC
	Agency/Group/Organization Type	Services-Education Civic Leaders
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	LVCC was contacted and provided information on the needs of the low-mod population in the Lehigh Valley.

22.	Agency/Group/Organization	Allentown Diocese
	Agency/Group/Organization Type	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Services-Persons with Disabilities Services-Health Services-Education Civic Leader
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Allentown Diocese was contacted and provided information on the needs of the low-mod population in the Lehigh Valley.
23.	Agency/Group/Organization	Big Brother Big Sister of Lehigh Valley
	Agency/Group/Organization Type	Services-Children Services-Education Civic Leaders Regional organization
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Big Brother Big Sister of Lehigh Valley was contacted and provided information on the needs of the youth population in the Lehigh Valley. They submitted a funding request for the Bigs Mentoring Program. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Annual Action Plan.

24.	Agency/Group/Organization	Aspire to Autonomy, Inc. (ASPIRE)
	Agency/Group/Organization Type	Services-Victims of Domestic Violence Services-Victims Regional organization
	What section of the Plan was addressed by Consultation?	Homeless Needs-Families with children Homelessness Needs-Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	ASPIRE was contacted to discuss the prevalence of human trafficking in Lehigh County, and it submitted a request for funding for operating costs for mental health therapy for victims of human trafficking or those at high risk of being trafficked. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Annual Action Plan.
25.	Agency/Group/Organization	Community Action Lehigh Valley (CALV)
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Services-Health Services-Education Services-Employment 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 Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	CACLV was contacted regarding the needs of low- and moderate-income individuals in Lehigh County and submitted funding requests for an urgent need roof and HVAC replacement program, and Second Harvest. The County reviewed the applications and funded the activities because they met the goals and objectives as outlined in the County's Annual Action Plan.
26.	Agency/Group/Organization	Communities In School of Eastern PA
	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Services-Education Regional organization
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	CIS was contacted and provided information on the needs of the youth population in the Lehigh Valley. They submitted a funding request for LCTI support. The County reviewed the application and funded the activity because they met the goals and objectives as outlined in the County's Annual Action Plan.
27.	Agency/Group/Organization	Parkland Cares
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Homeless Services-Health Regional organization

	What section of the Plan was addressed by Consultation?	Homeless Needs-Chronically homeless Homeless Needs-Families with children Homelessness Needs-Veterans Homelessness Needs-Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Parkland Cares was contacted and provided information on the needs of the low-mod population in the Lehigh Valley. They submitted a funding request for their food pantry program. The County reviewed the applications and funded the activities because they met the goals and objectives as outlined in the County's Annual Action Plan.
28.	Agency/Group/Organization	Whitehall Coplay Hunger Initiative
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Homeless Services-Health Regional organization
	What section of the Plan was addressed by Consultation?	Homeless Needs-Chronically homeless Homeless Needs-Families with children Homelessness Needs-Veterans Homelessness Needs-Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	WCHI was contacted and provided information on the needs of the low-mod population in the Lehigh Valley. WCHI submitted two funding requests for their Food Pantry and Garden. The County reviewed the applications and funded the activities because they met the goals and objectives as outlined in the County's Annual Action Plan.

29.	Agency/Group/Organization	Lehigh Conference of Churches
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Victims of Domestic Violence Services-homeless Services - Victims Regional organization Civic Leaders
	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?	Lehigh Conference of Churches was contacted and presented the needs of homeless and persons at-risk of becoming homeless and other households in Lehigh County.
30.	Agency/Group/Organization	Lehigh Valley Health Network
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Health Agency Child Welfare Agency 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 Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lehigh Valley Health Network was contacted to determine the needs of LMI residents, homeless individuals, persons at risk of homelessness, and persons with HIV/AIDS living in Lehigh County.
31.	Agency/Group/Organization	Bradbury Sullivan Center
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Education Services-Victims Regional organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Bradbury Sullivan Center was contacted regarding the needs of LMI residents, homeless persons, persons at-risk of becoming homeless, and members of the LGBTQ+ community in Lehigh County.

32.	Agency/Group/Organization	Heidel Hollow Farm
	Agency/Group/Organization Type	Services-Education
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Heidel Hollow Farm was contacted regarding the needs of LMI residents in Lehigh County.
33.	Agency/Group/Organization	Lehigh Valley Center for Independent Living
	Agency/Group/Organization Type	Housing Services-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?	LVCIL was contacted to discuss the needs of elderly and disabled persons in Lehigh County, and submitted a request for continued funding for housing location assistance. The County reviewed the application and funded the activity because they met the goals and objectives as outlined in the County's Annual Action Plan.
34.	Agency/Group/Organization	Manito Life Center
	Agency/Group/Organization Type	Services-Children Services-Education

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Manito Life Center was contacted regarding the needs of at-risk youth and submitted a request for funding for their Therapeutic Riding Program. The County reviewed the application and funded the activity because they met the goals and objectives as outlined in the County's Annual Action Plan.
35.	Agency/Group/Organization	Sights for Hope
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Regional organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sights for Hope was contacted for information regarding needs of the disabled population issues in Lehigh County.
36.	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?	Casa Guadalupe was contacted for information regarding the needs of Hispanic and LMI residents of the Lehigh Valley.
37.	Agency/Group/Organization	New Bethany, Inc.
	Agency/Group/Organization Type	Services-Housing Services-Homeless Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy 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?	New Bethany, Inc. was contacted about homelessness strategy in Lehigh County.
	Agency/Group/Organization	The Literacy Center

38.	Agency/Group/Organization Type	Services-Education Services-Employment Regional organization Planning organization Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Literacy Center was contacted about low-moderate income resident needs in Lehigh County.
39.	Agency/Group/Organization	Lehigh Conversation
	Agency/Group/Organization Type	Services-Education Services-Employment Planning organization Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lehigh Conservation was contacted for information regarding low-mod resident needs in Lehigh Valley.
40.	Agency/Group/Organization	Verizon
	Agency/Group/Organization Type	Services-Broadband Internet Service Provider Services-Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Economic Development Other-Broadband Access Plan

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Verizon's service plans were examined to ascertain broadband access in Lehigh Valley.
41.	Agency/Group/Organization	Lehigh Career & Technical Institute (LCTI)
	Agency/Group/Organization Type	Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	LCTI was contacted about job training needs for LMI persons within the county.
42.	Agency/Group/Organization	Black Heritage Association of the Lehigh Valley
	Agency/Group/Organization Type	Services-Employment Regional Organization Civic Leaders
	What section of the Plan was addressed by Consultation?	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?	Black Heritage Association of the Lehigh Valley was contacted and submitted a request for new funding to prepare LMI residents for construction careers. The County reviewed the application and funded the activity because they met the goals and objectives as outlined in the County's Annual Action Plan.
	Agency/Group/Organization	North Penn Legal Services

43.	Agency/Group/Organization Type	Services – Housing Services-Elderly Persons Services-Victims of Domestic Violence Services-Victims 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?	North Penn Legal Services was contacted and submitted requests for continued funding for fair housing activities and for legal aid to LMI residents. The County reviewed the applications and funded the activities because they met the goals and objectives as outlined in the County's Annual Action Plan.
44.	Agency/Group/Organization	Barry Issett & Associates
	Agency/Group/Organization Type	Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development 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 Conservation was contacted for information regarding employment and economic needs in Lehigh Valley

Table 3 – Agencies, groups, organizations who participated

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 Annual Action Plan.
Annual and Five Year Capital Plans	Lehigh County Housing Authority/Valley Housing Development Corporation (LCHA/VHDC)	LCHA/VHDC is the lead agency providing public housing assistance in Lehigh County. The goals of the County and the Housing Authority are complementary.
Lehigh Valley Hazard Management Plan	Lehigh County and Northampton County Emergency Management Agencies	They are incorporated in the Annual Action Plan.
2021 Childhood Lead Surveillance Annual Report	PA Department of Health	They are incorporated in the Annual Action Plan.
Broadband Equity, Access, and Deployment (BEAD) Program	Pennsylvania Broadband Development Authority	They are incorporated in the Annual Action Plan.
Livable Landscapes – Lehigh County Open Space Plan	Lehigh Valley Planning Commission	They are incorporated in the Annual Action Plan.
Analysis of Impediments to Fair Housing Choice	Lehigh County Department of Community and Economic Development	They are incorporated in the Annual Action Plan.

Table 4 – Other local / regional / federal planning efforts

Narrative (optional)

Lehigh County's Department of Community and Economic Development is the administrating agency for the CDBG and HOME programs. 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 and Whitehall Townships.

Coordination with various non-profit organizations, such as Family Promise, LVCC, Allentown Diocese, Big Brother Big Sister of Lehigh Valley, ASPIRE, CALV, Communities In School of Eastern PA, Parkland Cares, Whitehall Coplay Hunger Initiative, Lehigh Conference of Churches, Lehigh Valley Health Network,

Bradbury Sullivan Center, Heidel Hollow Farm, Lehigh Valley Center for Independent Living, Manito Life Center, Sights for Hope, Casa Guadalupe Center, New Bethany, Inc, The Literacy Center, Lehigh Conservation, LCTI, Black Heritage Association of the Lehigh Valley and North Penn Legal Services 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.

DRAFT

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

The Annual Action Plan is made up of multiple components, which include: funding applications from municipalities, social service agencies, and housing organizations; citizen participation comments; and the development of the Annual Action Plan. Each item of the plan primarily benefits the low- and moderate-income population in Lehigh County. Lehigh County has an approved Citizen Participation Plan, as required by HUD, which is on file with HUD and at the Lehigh County Department of Community and Economic Development. The County abided by its Citizen Participation Plan in the preparation and development of the FY 2025 Annual Action Plan.

The FY 2025 Annual Action Plan planning process started with the distribution of applications for CDBG and HOME funds. On Thursday, February 27, 2025, the Department of Community and Economic Development distributed the FY 2025 CDBG Requests for Funding to local municipalities and non-profit agencies/organizations. These were due back to the County on Tuesday, April 15, 2025. Information was also available on the Lehigh County Department of Community and Economic Development's website.

The County held two (2) needs public hearings to obtain resident input on the needs of Lehigh County. The needs public hearing notice was published on Monday, March 14, 2025, and was posted on the County's website and emails were sent to local municipalities and non-profit agencies/organizations. The first session for the first public hearing was held on Tuesday, March 25, 2025, and the second session was held on Thursday, March 27, 2025. At these public hearings, residents had the opportunity to give their input and their thoughts on the housing, community development, and economic development needs in Lehigh County and how the CDBG funds should best be spent to benefit low- and moderate-income persons. The Final Public Hearing Notice was published on Monday, June 30, 2025, and held on Tuesday, July 15, 2025, at 12:00 PM, the residents were given the opportunity to comment on the "draft" version of the FY 2025 Annual Action Plan and which projects/activities would be funded with FY 2025 CDBG and HOME funds.

The FY 2025 Annual Action Plan was on public display July 1, 2025, through July 31, 2025, at the Lehigh County Department of Community and Economic Development, Lehigh County Government Center, 17 South 7th Street, Allentown, PA 18101, at all of the area libraries located in the County, and on the County's website (<http://www.lehighcounty.org/>).

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response/Attendance	Summary of comments received	Summary of comments not accepted & reasons	URL (If applicable)
1.	Newspaper Ad #1	Minorities Persons with disabilities Non-targeted / broad community Residents of Public and Assisted Housing Agencies / Organizations	The needs public hearing notice for both hearings was published on Friday, March 14, 2025 in The Morning Call, and the needs public hearing notice was posted on the County's website and emails were sent to local municipalities and non-profit agencies/organizations.	The proof of publication for the ads are included in the Citizen Participation Appendix of the Annual Action Plan.	None.	Not Applicable.
2.	Public Meetings #1	Minorities Persons with disabilities Non-targeted / broad community Residents of Public and Assisted Housing Agencies / Organizations	The first session of the first needs hearing was held on Tuesday, March 25, 2025, the second needs hearing was held on Thursday, March 27, 2025. See public hearing comments and the sign-in sheets in the summaries.	See public hearing summaries in the Citizen Participation section of the Plan.	None.	http://www.lehighcounty.org

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response/Attendance	Summary of comments received	Summary of comments not accepted & reasons	URL (If applicable)
3.	Internet Outreach	Non-targeted / broad community	None.	None.	None.	http://www.lehighcounty.org
4.	Email Blast	Minorities Persons with disabilities Non-targeted / broad community Residents of Public and Assisted Housing Agencies / Organizations	The email blast was sent out on March 3, 2025 to the distribution list. Municipalities and agencies/organizations submitted applications for funding and provided comments at the public hearings.	Of the twenty-seven (27) funding applications received in FY 2025, nineteen (19) were funded. Lehigh County needs were addressed through the funded projects.	None.	Not Applicable.
5.	Newspaper Ad #2	Minorities Persons with disabilities Non-targeted / broad community Residents of Public and Assisted Housing	The final public hearing notice was published in The Morning Call on Monday, June 30, 2025, in The Morning Call. This ad was published to inform the public that the Draft FY 2025 Annual Action Plan was on display and a second public hearing to solicit comments would be held on July 15, 2025.	The proof of publication for the ads are included in the Citizen Participation Appendix of the Annual Action 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 & reasons	URL (If applicable)
		Agencies / Organizations				
6.	Public Meeting #2	Minorities Persons with disabilities Non-targeted / broad community Residents of Public and Assisted Housing Agencies / Organizations	The final public hearing to solicit comments on the FY 2025 budget and draft FY 2025 Annual Action Plan was held on July 15, 2025. See public hearing comments and the sign-in sheets in the summaries.	See public hearing summaries in the Citizen Participation section of the Plan.	None.	http://www.lehighcounty.org

Table 5 – Citizen Participation Outreach

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

Lehigh County will receive \$1,274,277 in CDBG funds and \$524,168.61 in HOME funds for the FY 2025 program year. The program year is October 1, 2025 through September 30, 2026. These funds will be used to address the following strategies: Housing Strategy, Homeless Strategy, Community Development Strategy, and Administration, Planning, and Management Strategy. The accomplishments of these projects/activities will be reported in the FY 2025 Consolidated Annual Performance and Evaluation Report (CAPER).

Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 7				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	1,274,277	0	0	1,247,277	3,690,503	A total of 18 projects/activities were funded based on the CDBG allocations

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 7				Expected Amount Available Reminder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	524,168.61	0	0	524,168.61	1,306,163.66	4 projects/activities were funded based on FY 2025 HOME allocation.

Table 6 - Expected Resources – Priority Table

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

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

- Lehigh County Affordable Housing Trust Funds (AHTF)** - The Pennsylvania Optional County Affordable Housing Trust Funds Act of 1992 (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.

- **Continuum of Care Grant** - Lehigh County is part of the Lehigh Valley Regional Housing Advisory Board, which in turn is a part of the Eastern Pennsylvania CoC. In FY 2024 CoC funds, Eastern Pennsylvania CoC received funding for fifty-one (51) projects totaling \$29,254,498 for support services and permanent supportive housing projects throughout the region. HUD contracted with these agencies during the FY 2024 program year.
- **The Lehigh County Housing Authority** - Expects to receive \$671,240 in FY 2025 funds from the Public Housing Capital Fund Program.
- Other federal funds that may be used in support of housing, community development, and economic development during FY 2025 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 on any land, property, or buildings that are available for sale with CDBG funds.

Discussion

Lehigh County is a member of the Eastern Pennsylvania Continuum of Care Network, PA-509 Continuum of Care, administered by the Lehigh Valley Regional Homeless Advisory Board (RHAB).

The Lehigh Valley Regional Homeless Advisory Board was allocated FY 2024 funding to the following projects:

- **Catholic Social Services of the Diocese of Scranton, Inc. - PA0386-Rural Permanent Supportive Housing** - \$152,045
- **Catholic Social Services of the Diocese of Scranton, Inc. - PA0519-PSHP Pike County** - \$129,039
- **Catholic Social Services of the Diocese of Scranton, Inc. - PA0450-Susquehanna/Wayne PSHP** - \$138,988
- **Center for Community Action - PA0813 South Central PA 2024 RRH** - \$357,351
- **Center for Community Action - PA0661 Bedford, Fulton, Huntingdon 2024 RRH** - \$131,959
- **Center for Community Action - PA0372 Blair CAP - Rapid Re-Housing Program** - \$1,210,041
- **Center for Community Action - PA1138 Central Valley JMSU RRH** - \$387,177
- **Centre County Government - PA0814 Centre County Rapid Re-Housing Program** - \$435,419
- **Clinton County Housing Coalition, Inc. - PA0966 CCHC Regional Rapid Rehousing FY2024** - \$259,941

- Commonwealth of Pennsylvania - PA0188 Commonwealth of PA HMIS (PA-509) FY2024 - \$394,946
- Commonwealth of Pennsylvania - PA-509 CoC Planning Project Application FY2024 (PA0964) - \$1,140,791
- County of Franklin - PA0182 - Franklin/Fulton Homeless Assistance Project - \$313,663
- County of Franklin - PA0649 - Franklin/Fulton S+C Project - \$112,990
- Fitzmaurice Community Services, Inc - PA0214 - Pathfinders PSH - \$284,177
- Housing Authority of the County of Cumberland - PA0447 - PSH Consolidated - \$747,537
- Housing Authority of the County of Cumberland - PA0812 - Rapid Rehousing Cumberland Perry Lebanon - \$193,186
- Housing Authority of the County of Cumberland - PA0177 Perry County Veterans Program - \$54,091
- Housing Authority of the County of Cumberland - PA0514 Perry County Rapid Rehousing - \$238,316
- Housing Development Corporation of NEPA - PA0384 HDC SHP 3 2024 - \$201,898
- Housing Development Corporation of NEPA - PA0582 HDC SHP 6 2024 - \$195,296
- Housing Transitions, Inc. - PA0176 Nittany House Apartments - \$298,613
- Lehigh County Housing Authority - PA0215 LCHA S+C 2024 - \$299,458
- Monroe, County of - PA1087 - Pocono Mountains Rapid-Rehousing Project FY2024 - \$312,561
- New Bethany, Inc. - PA1086 New Bethany Rapid Rehousing FY2024 - \$164,380
- Northern Cambria Community Development Corporation - PA0360 Independence Gardens - \$316,868
- Pennsylvania Coalition Against Domestic Violence - PA1137 FY 24 NEW Eastern PA CoC DV RRH - \$2,102,686
- Pennsylvania Coalition Against Domestic Violence - PA1119 Eastern PA CoC DV CE Extension Renewal FY24 - \$331,027
- Pennsylvania Coalition Against Domestic Violence - PA1088 Eastern PA CoC DV RRH Consolidation Renewal FY24 - \$7,049,236
- Pennsylvania Coalition Against Domestic Violence - PA0927 Coordinated Entry Specialist for Domestic Violence - \$90,341
- Pennsylvania Coalition Against Domestic Violence - PA1137 FY24 NEW Eastern PA CoC DV RRH Expansion - \$3,445,453
- Resources for Human Development, Inc. - PA0205-Crossroads Family - \$317,022
- Resources for Human Development, Inc. - PA0206-Crossroads Individual - \$453,046
- Resources for Human Development, Inc. - PA0449-Crossroads Housing Bonus Expansion - \$244,022
- Service Access and Management Inc. - PA1031 Rapid Re-Housing Franklin County - \$174,897
- Tableland Services, Inc. - PA0705 Consolidated Permanent Supportive Housing with Disabilities - \$448,983
- Tableland Services, Inc. - PA0366 SHP Rapid Re-Housing Project - \$173,199
- The Lehigh Conference of Churches - PA0213 - Outreach and Case Management for the Disabled, Chronically Homeless - \$75,838
- The Lehigh Conference of Churches - PA1029 - Pathways RRH - \$479,346
- The Lehigh Conference of Churches - PA0222 - Pathways Permanent Supportive Housing Consolidation - \$1,336,584
- The Salvation Army, a New York Corporation - Salvation Army Carlisle PH Project - \$92,526
- The Salvation Army, a New York Corporation - Allentown Hospitality House Permanent Housing Program - \$221,088
- Third Street Alliance for Women & Children - PA0811_Third Street Alliance_Lehigh Valley Rapid ReHousing Program - \$465,955

- **Transitions of PA - PA0859 SUN Counties Rapid Re-Housing for Domestic Violence Victims - \$124,496**
- **Transitions of PA - PA1139 Transitions of PA PSH for Snyder and Northumberland Counties - \$87,757**
- **Transitions of PA - PA0445 Transitions of PA Permanent Supportive Housing - \$268,391**
- **United Way of Pennsylvania - PA1084 Enhanced East CES Expansion - \$192,026**
- **United Way of Pennsylvania - PA1084 Enhanced East CES - \$349,125**
- **United Way of Pennsylvania - PA 0736 - Connect To Home Coordinated Entry Project - \$651,410**
- **Valley Housing Development Corporation - PA0216-VHDC SHP #2/3 2024 - \$500,525**
- **Valley Youth House Committee, Inc. - PA0808 - Lehigh Valley RRH for families - \$374,725**
- **Valley Youth House Committee, Inc. - PA0887 - TH-RRH for Lehigh Valley Youth - \$734,063**

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

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

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.	HS-1 Housing Development	2024	2028	Affordable Housing	County Wide	Housing Priority	HOME: \$479,615.61	Rental units constructed: 5 Rental Units
2.	HS-3 Housing Rehabilitation	2024	2028	Affordable Housing	County Wide	Housing Priority	CDBG: \$176,000	Rental housing rehabilitation: 25 Households Housing Units
3.	HS-5 Fair Housing	2024	2028	Affordable Housing	County Wide	Housing Priority	CDBG: \$10,000	Public service activities for Low/Moderate Income Housing Benefit: 45 Households Assisted 1 Other
4.	HS-6 Housing Supportive Services	2024	2028	Affordable Housing	County Wide	Housing Priority	CDBG: \$18,913	Public service activities for Low/Moderate Income Housing Benefit: 25 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5.	CDS-1 Infrastructure	2024	2028	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$645,129.47	Public facility or infrastructure activities other than low/moderate income housing benefit: 19,656 Persons Assisted
6.	CD-3 Public Services	2024	2028	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$75,000	Public service activities other than Low/Moderate Income Housing Benefit: 220 Persons Assisted
7.	CD-4 Food Programs	2024	2028	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$44,000	Public service activities other than Low/Moderate Income Housing Benefit: 25,538 Persons Assisted
8.	CD-6 Public Safety	2024	2028	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$45,379.53	Public service activities other than Low/Moderate Income Housing Benefit: 3,423 Persons Assisted
9.	APM-1 Coordination	2024	2028	Non-Housing Community Development administrative management	County Wide	Administration, Planning, and Management Priority	CDBG: \$230,855.00 HOME: \$44,553.00	Other: 2 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10..	APM-3 Planning	2024	2028	Non-Housing Community Development administrative management	County Wide	Administration, Planning, and Management Priority	CDBG: \$20,000.00	Persons Benefited: 15 Individuals

Table 53 – Goals Summary

Goal Descriptions

1.	Goal Name	HS-1 Housing Development
	Goal Description	Increase the number of decent, safe, sanitary, accessible, and affordable housing units in the County, both for owner-occupied and rental-occupied
2.	Goal Name	HS-3 Housing Rehabilitation
	Goal Description	Increase the number of decent safe, sanitary, accessible, and affordable housing units in the County, both for owner-occupied and rental-occupied housing.
3.	Goal Name	HS-5 Fair Housing
	Goal Description	Affirmatively further fair housing by promoting and informing households on their rights and educating landlords, realtors, mortgage companies, sellers, etc. on fair housing practices which will reduce discrimination in housing.
4.	Goal Name	HS-6 Housing Supportive Services
	Goal Description	Promote and assist low- and moderate-income households to locate and/or remain in affordable housing through housing counseling and supportive services.
5.	Goal Name	CD-1 Infrastructure
	Goal Description	Improve and upgrade roads, bridges, utilities, sewer systems, ADA accessibility, etc. to meet the increasing demand.

6.	Goal Name	CD-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	CD-4 Food Programs
	Goal Description	Provide assistance for food and nutritional programs to address the needs of the unemployed, underemployed, elderly, disabled, and homeless individuals.
8.	Goal Name	CD-6 Public Safety
	Goal Description	Provide funding to improve and expand fire protection, emergency health and management services, crime prevention, etc. to better serve the residents of the county.
9.	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.
10.	Goal Name	APM-3 Planning
	Goal Description	Provide planning for special studies, environmental review records, fair housing choice activities, promoting Section 3 enterprises, training and outreach, and compliance with federal, state and local laws and ordinances.

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

Lehigh County proposes to assist the following:

- **Extremely Low-Income** - 10 families
- **Low-Income** - 12 families
- **Moderate-Income** - 8 families

AP-35 Projects – 91.220(d)

Introduction

Listed below are the FY 2025 CDBG and HOME activities for Lehigh County.

#	Project Name
1.	Black Heritage Association of the Lehigh Valley – Section 3 Contractor and Worker Training
2.	North Penn Legal Services – Fair Housing Outreach
3.	CDBG Administration
4.	Aspire – Mental Health Therapy
5.	Big Brothers Big Sisters – Bigs Mentoring Program
6.	Communities in Schools – LCTI Support
7.	LVCIL – PLACE
8.	Manito – Therapeutic Riding
9.	North Penn Legal Services – Legal Help Project
10.	Parkland CARES – Food Pantry
11.	CALV – Second Harvest Food Bank
12.	CACLV – Urgent Need Roof and HVAC Replacement Program
13.	Catasauqua Borough – Street Reconstruction
14.	Coplay Borough – Fire Equipment Replacement
15.	Emmaus Borough – Curb Cuts
16.	Fountain Hill Borough – Street Reconstruction
17.	Slatington Borough – Street Reconstruction
18.	Slatington Borough – Road Reconstruction
19.	HOME Administration
20.	CHDO Set-Aside
21.	Soteria / Cortex – Urban Place Apartments
22.	Calvary Temple – Willows at Calvary

Table 7 – Project Information

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

needs

Lehigh County has allocated its FY 2025 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.

Rationale for the priorities for allocating investments geographically

The proposed activities and projects for FY 2025 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:

- Block Group 1, Census Tract 68, Lehigh County, Pennsylvania, 84.10%
- Block Group 2, Census Tract 61.02, Lehigh County, Pennsylvania, 75.80%
- Block Group 4, Census Tract 68, Lehigh County, Pennsylvania, 67.10%
- Block Group 3, Census Tract 57.03, Lehigh County, Pennsylvania, 66.20%
- Block Group 5, Census Tract 67.01, Lehigh County, Pennsylvania, 64.70%
- Block Group 2, Census Tract 65, Lehigh County, Pennsylvania, 60.50%
- Block Group 3, Census Tract 56.02, Lehigh County, Pennsylvania, 60.30%
- Block Group 1, Census Tract 59.02, Lehigh County, Pennsylvania, 59.20%
- Block Group 4, Census Tract 67.01, Lehigh County, Pennsylvania, 58.40%
- Block Group 3, Census Tract 52, Lehigh County, Pennsylvania, 57.90%
- Block Group 3, Census Tract 51, Lehigh County, Pennsylvania, 57.60%
- Block Group 1, Census Tract 58, Lehigh County, Pennsylvania, 57.50%
- Block Group 2, Census Tract 51, Lehigh County, Pennsylvania, 57.20%
- Block Group 3, Census Tract 59.01, Lehigh County, Pennsylvania, 56.90%

- Block Group 1, Census Tract 55.03, Lehigh County, Pennsylvania, 54.70%
- Block Group 2, Census Tract 60.01, Lehigh County, Pennsylvania, 54.30%
- Block Group 1, Census Tract 63.03, Lehigh County, Pennsylvania, 53.90%
- Block Group 4, Census Tract 56.02, Lehigh County, Pennsylvania, 52.30%
- Block Group 3, Census Tract 57.05, Lehigh County, Pennsylvania, 51.90%
- Block Group 2, Census Tract 57.03, Lehigh County, Pennsylvania, 51.30%

Additionally, because Lehigh County is an exception grantee that use the upper quartile standard, all Census Tracts where at least 44.20% of households with low- and moderate-incomes are CDBG eligible. The following Census Tracts and Block Groups are eligible:

- Block Group 5, Census Tract 65, Lehigh County, Pennsylvania, 50.50%
- Block Group 1, Census Tract 63.05, Lehigh County, Pennsylvania, 50.00%
- Block Group 3, Census Tract 58, Lehigh County, Pennsylvania, 50.00%
- Block Group 1, Census Tract 57.02, Lehigh County, Pennsylvania, 49.60%
- Block Group 1, Census Tract 57.04, Lehigh County, Pennsylvania, 48.70%
- Block Group 1, Census Tract 64.01, Lehigh County, Pennsylvania, 48.60%
- Block Group 3, Census Tract 57.02, Lehigh County, Pennsylvania, 48.10%
- Block Group 4, Census Tract 63.05, Lehigh County, Pennsylvania, 47.80%
- Block Group 4, Census Tract 65, Lehigh County, Pennsylvania, 46.30%
- Block Group 1, Census Tract 53.02, Lehigh County, Pennsylvania, 45.80%
- Block Group 2, Census Tract 63.12, Lehigh County, Pennsylvania, 45.40%
- Block Group 3, Census Tract 68, Lehigh County, Pennsylvania, 45.40%
- Block Group 2, Census Tract 68, Lehigh County, Pennsylvania, 45.10%
- Block Group 2, Census Tract 62.04, Lehigh County, Pennsylvania, 44.80%
- Block Group 2, Census Tract 63.03, Lehigh County, Pennsylvania, 44.80%
- Block Group 4, Census Tract 51, Lehigh County, Pennsylvania, 44.60%
- Block Group 2, Census Tract 69.02, Lehigh County, Pennsylvania, 44.50%
- Block Group 1, Census Tract 61.02, Lehigh County, Pennsylvania, 44.20%

The HOME funds will be used for administration and for housing projects/activities. These funds will be targeted to low-income households and projects/activities designed to provide affordable housing to low-income households. The disbursement is based on the needs of low- and moderate-income households, not by geographic area.

Lehigh County does not anticipate any obstacles in the performance of the FY 2025 CDBG and HOME activities. Affordable housing was identified as the largest underserved need in Lehigh County in the Five-Year Consolidated Plan. Lehigh County during this program year became an HUD entitlement community under the HOME program. The County will use these additional funds to help assist with the need for affordable housing. The primary obstacle to meeting the underserved needs are the limited resources available to address the identified priorities in the County. Lehigh County will continue to partner with

other agencies when feasible, to leverage resources and maximize outcomes in housing, community, and economic development.

DRAFT

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

1.	Project Name	Black Heritage Association of the Lehigh Valley – Section 3 Contractor and Worker Training
	Target Area	County-wide
	Goals Supported	AMP-3 Planning
	Needs Addressed	Administration, Management, and Planning Strategy
	Funding	CDBG: \$20,000.00
	Description	This is an HUD S3 Certification & Job Training, Employment, and Business Opportunities outreach program for LMI individuals and construction contractors that provide maintenance and general construction services and workers.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	This project will assist 15 low- and moderate-income individuals.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 1132 Hamilton Street #203, Allentown, PA 18101.
	Planned Activities	The CDBG Matrix Code is 21A Administration.
2.	Project Name	North Penn Legal Services – Fair Housing Outreach
	Target Area	County Wide
	Goals Supported	HS-5 Fair Housing
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$4,000.00

	Description	NPLS will continue to provide housing-related legal help to low-income people in Lehigh County, using the LegalServer CMS (case management system) to track all details of legal cases and to generate reports. This system allows us to track time reports, income, demographics, and outcomes that are used for reporting and invoicing.
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	This project will assist 15 low- and moderate-income individuals.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 559 Main Street, Suite 200, Bethlehem, PA 18018
	Planned Activities	The National Objective is Low/Mod Limited Clientele Benefit (LMC). The CDBG Matrix Code is 21D Fair Housing Activities (subject to Admin cap).
3.	Project Name	CDBG Administration
	Target Area	County Wide
	Goals Supported	APM-1 General Administration
	Needs Addressed	Administration, Planning, and Management Priority
	Funding	CDBG: \$230,855.00
	Description	CDBG funds will be used to provide administration, management, and planning services to efficiently and effectively operate Federal and state grant programs
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	This project will assist 48,944 low- and moderate-income individuals and 1 organization.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 17 South Seventh Street, Allentown, PA 18101

	Planned Activities	The Regulatory Citation is General Program Administration, 570.206. The Matrix Code is 21A, General Program Administration.
4.	Project Name	Aspire – Mental Health Therapy
	Target Area	County Wide
	Goals Supported	CD-3 Public Services
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$15,000.00
	Description	ASPIRE's Specialized Trauma-Focused and Person-Centered Mental Health Therapy Program brought mental health therapy to individuals who are being trafficked, have been trafficked in the past, or are at a high risk of becoming trafficked.
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	This project will assist 150 low- and moderate-income individuals.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 411 Walnut Street, Allentown, PA 18102
	Planned Activities	The National Objective is Low/Mod Clientele (LMC). The Matrix Code is 05O, Mental Health Services.
5.	Project Name	Big Brothers Big Sisters – Bigs Mentoring Program
	Target Area	County Wide
	Goals Supported	CD-3 Public Services
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$20,000.00
	Description	Big Brother Big Sisters of the Lehigh Valley will use CDBG funding to implement its High School Bigs Mentoring Program in the Whitehall Coplay School District.

	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	This project will assist 20 low- and moderate-income individuals.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 41 S. Carlisle St. Allentown, PA 18109
	Planned Activities	The National Objective is Low/Mod Clientele (LMC). The Matrix Code is 05D, Youth Services.
6.	Project Name	Communities in Schools – LCTI Support
	Target Area	County Wide
	Goals Supported	CD-3 Public Services
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$20,000.00
	Description	CIS will provide intensive case management support to address the nonacademic barriers that may impact a student's academic success in their career program at LCTI. By addressing the nonacademic barriers it is our goal to empower students to stay in school and achieve in their chosen career path.
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	The project will assist 20 low- and moderate-income individuals.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 739 N 12 th Street, Allentown, PA 18102
	Planned Activities	The National Objective is Low/Mod Clientele (LMC). The Matrix Code is 05O, Mental Health Services.

7.	Project Name	LVCIL - PLACE
	Target Area	County Wide
	Goals Supported	HS-6 Housing Supportive Services
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$18,913.00
	Description	The PLACE (People Living in Accessible Community Environments) program will provide housing counseling services to 25 Lehigh County residents with disabilities, and their family members, who are living on limited income and may be at-risk of losing their housing.
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	The project will assist 25 low- and moderate-income individuals.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 713 North 13 th Street, Allentown, PA 18102
	Planned Activities	The National Objective is Low/Mod Clientele (LMC). The Matrix Code is 14J, Housing Services.
8.	Project Name	Manito – Therapeutic Riding
	Target Area	County Wide
	Goals Supported	CD-3 Public Services
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$20,000.00
	Description	Manito Life Center will provide therapeutic riding and equine assisted activities to 30 Lehigh County individuals from low to moderate income households. Participants will realize alleviation in depression, anxiety and symptoms of stress and post-traumatic stress, and will achieve a higher quality of life by developing enhanced resilience, life skills, coping skills and work-related skills.
	Target Date	9/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	The project will assist 30 low- and moderate-income individuals.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 2160 N. Cedar Crest Blvd. Allentown, PA 18014
	Planned Activities	The National Objective is Low/Mod Clientele (LMC). The Matrix Code is 05O, Mental Health Services.
9.	Project Name	North Penn Legal Services – Legal Help Project
	Target Area	County Wide
	Goals Supported	HS-6 Fair Housing
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$15,000.00
	Description	NPLS will continue to provide housing-related legal help to low-income people in Lehigh County, using the LegalServer CMS (case management system) to track all details of legal cases and to generate reports. This system allows us to track time reports, income, demographics, and outcomes that are used for reporting and invoicing.
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	The project will assist 30 low- and moderate-income individuals.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 559 Main Street, Suite 200, Bethlehem, PA 18018
	Planned Activities	The National Objective is Low/Mod Clientele (LMC). The Matrix Code is 05C, Legal Services.
10.	Project Name	Parkland CARES – Food Pantry
	Target Area	County Wide

	Goals Supported	CD-4 Food Programs
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$12,000
	Description	Parkland CARES continues to see increasing food needs in our community due to rising food costs and supply chain issues experienced by Second Harvest Food Bank. If awarded further funds through the Lehigh County CDBG, Parkland CARES will spend funds on food items such as milk, eggs, dairy, pasta, bread, fruits and vegetables to distribute at our Choice Pantry that currently serves over 150 Parkland area households per month.
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	The project will assist 5,538 low- and moderate-income individuals.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 5074 Kernsville Rd. Unit #4 Orefield, PA 18069
	Planned Activities	The National Objective is Low/Mod Clientele (LMC). The Matrix Code is 05W, Food Banks.
	11. Project Name	CALV – Second Harvest Food Bank
	Target Area	County Wide
	Goals Supported	CD-4 Food Programs
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$32,000.00
	Description	Fresh food access for under-served populations is an immediate need in Lehigh County. Second Harvest Food Bank will purchase and distribute fresh locally grown foods from area farmers, for distribution through the food pantry network within Lehigh County.
	Target Date	9/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	This project will serve 20,000 low- and moderate-income individuals.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 6969 Silver Crest Rd, Nazareth, PA 18064
	Planned Activities	The National Objective is Low/Mod Clientele (LMC). The Matrix Code is 05W, Food Banks.
12.	Project Name	CALV – Urgent Need Roof and HVAC Replacement Program
	Target Area	County Wide
	Goals Supported	HS-3 Housing Rehab
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$176,000.00
	Description	CALV's Lehigh County Roof and HVAC Repair and Replacement Program aims to assist homeowners residing in Lehigh County (outside city limits) whose incomes are at or below 80% of the Area Median Income (AMI) and whose homes are in urgent need of roof and/or HVAC system repair or replacement. This program will enhance housing safety and quality for ten (10) eligible homeowners, contributing to better living conditions, health, and stability.
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	This project will assist 25 low- and moderate-income households.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 337 East Fifth Street, Bethlehem, PA 18015
	Planned Activities	The National Objective is Low/Mod Clientele (LMC). The Matrix Code is 14A, Rehab: Single-Unit Residential.
13.	Project Name	Catasauqua Borough – Street Reconstruction

	Target Area	County Wide
	Goals Supported	CD-1 Community Infrastructure
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$70,000.00
	Description	Funds will be provided for full-deep removal and replacement of Wood Street (2 nd and Front Street) and Strawberry (between 2 nd and Front).
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit 1,300 low and moderate persons.
	Location Description	The streets will be reconstructed on Wood Street (2nd and Front Street) and Strawberry (between 2nd and Front)
	Planned Activities	The National Objective is Low/Mod Limited Clientele. The Matrix Code is 03K, Street Improvements.
14.	Project Name	Coplay Borough – Fire Equipment Replacement
	Target Area	Conty Wide
	Goals Supported	CD-6 Public Safety
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$45,379.53
	Description	The purpose of this request is to purchase fire protection equipment to replace outdated equipment for the Coplay Fire Department. This life saving equipment includes 3M™ Scott™ carbon cylinder for SCBA users, 3M Scott's AV-3000 HT facepiece meets all requirements established in the NFPA 1981, 2018 Edition standard, with state-of-the-art materials to provide enhanced thermal durability and voice intelligibility performance for added safety, and 3M™ Scott™ Air-Pak™ X3 Pro SCBA Snap Change 4.5.

	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	This project will assist 3,423 low- and moderate-income persons.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 98 S 4th St, Coplay, PA 18037
	Planned Activities	The National Objective is Low/Mod Income Area Benefit. The Matrix Code is 03O, Fire Stations/Equipment.
15.	Project Name	Emmaus Borough – Curb Cuts
	Target Area	County Wide
	Goals Supported	CD-1 Community Infrastructure
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$100,000.00
	Description	Removal of architectural barriers within the public right-of-way in highly traveled areas of the community, including at intersections of sidewalks leading to our downtown as well as sidewalks leading to one of our elementary schools. This project allows us to be compliant with federally mandated ADA handicap accessibility requirements.
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	This project will assist 11,652 low- and moderate-income persons.
	Location Description	Low-Mod Area
	Planned Activities	The National Objective is Low/Mod Limited Clientele. The Matrix Code is 03K, Street Improvements.
16.	Project Name	Fountain Hill Borough – Street Reconstruction
	Target Area	County Wide

	Goals Supported	CD-1 Community Infrastructure
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$199,900.00
	Description	Full-depth reconstruction of Hertzog Avenue from Broadway to Moravia Street, including replacement of curb and sidewalk in poor condition, i.e. cracked, broken, deteriorated, and installation/replacement of ADA ramps to provide accessibility. Street reconstruction work consists of removing all existing pavement and subbase material, curb to curb, as required for placement of 6"stone subbase, 5 " base course and 1.5" of wearing course.
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	This project will assist 520 low- and moderate-income persons.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; Hertzog Avenue between Broadway and Moravia Street
	Planned Activities	The National Objective is Low/Mod Limited Clientele. The Matrix Code is 03K, Street Improvements.
	17. Project Name	Slatington Borough – Street Reconstruction
	Target Area	County Wide
	Goals Supported	CD-1 Community Infrastructure
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$79,000.00
	Description	The purpose of this project is for the reconstruction of East Washington Street. Continuation of the Hill Street project funded via 2024 CDBG.
	Target Date	9/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	This project will assist 4,283 low- and moderate-income persons.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; W. South Street, 5th St. to 4th St; W. South Street, 4th St. to Main St; and E. Washington Street, Hill St. to S. Walnut St.
	Planned Activities	The National Objective is Low/Mod Limited Clientele. The Matrix Code is 03K, Street Improvements.
18.	Project Name	Slatington Borough – Road Reconstruction
	Target Area	County Wide
	Goals Supported	CD-1 Community Infrastructure
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$196,229.47
	Description	The purpose of this project is to reconstruct 3 street sections in the Borough of Slatington. Those Street sections are as follows: W. South Street, 5th St. to 4th St; W. South Street, 4th St. to Main St; and E. Washington Street, Hill St. to S. Walnut St.
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	This project will assist 1,810 low- and moderate-income persons.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; Hill Street between East Church and East Washington Streets, Slatington, PA 18080; C.T. 5100, B.G. 2.
	Planned Activities	The National Objective is Low/Mod Limited Clientele. The Matrix Code is 03K, Street Improvements.
19.	Project Name	HOME Administration
	Target Area	County wide

	Goals Supported	AMP-1 General Administration
	Needs Addressed	Administration, Management, and Planning – AMP
	Funding	HOME: \$44,553.61
	Description	HOME funds will be used to provide administration, management, and planning services to efficiently and effectively operate the HOME Investment Partnership (HOME) program.
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	1 Organization.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 17 South Seventh Street, Allentown, PA 18101
	Planned Activities	The CDBG Matrix Code is 21A General Program Administration.
20.	Project Name	CHDO Set-Aside
	Target Area	County wide
	Goals Supported	HS-1 Housing Development HS-2 Homeownership HS-3 Housing Rehabilitation
	Needs Addressed	Housing Strategy
	Funding	HOME: \$78,626.00
	Description	HOME funds will be used to assist a CHDO to increase the number of affordable housing units in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.
	Target Date	9/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	This project will assist 1 Low/Mod household.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem.
	Planned Activities	The National Objective is Low/Mod Housing Benefit (LMH). The CDBG Matrix Code is 12 Construction of Housing.
21.	Project Name	Soteria / Cortex – Urban Place Apartments
	Target Area	County Wide
	Goals Supported	HS-1 Housing Development
	Needs Addressed	Housing Strategy
	Funding	HOME: \$200,989.00
	Description	HOME funds will be used to assist in the development of affordable housing in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	This project will assist 2 Low/Mod household.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem.
	Planned Activities	The National Objective is Low/Mod Housing Benefit (LMH). The CDBG Matrix Code is 12 Construction of Housing.
22.	Project Name	Calvary Temple – Willows at Calvary

	Target Area	County Wide
	Goals Supported	HS-1 Housing Development
	Needs Addressed	Housing Strategy
	Funding	HOME: \$200,000.00
	Description	HOME funds will be used to assist in the development of affordable housing in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	This project will assist 2 Low/Mod households.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem.
	Planned Activities	The National Objective is Low/Mod Housing Benefit (LMH). The CDBG Matrix Code is 12 Construction of Housing.

AP-50 Geographic Distribution – 91.220(f)**Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

The following information provides a profile of the population, age, and racial/ethnic composition of Lehigh County. This information was obtained from the U.S. Census Bureau American Factfinder website, <http://factfinder.census.gov>. The 2019-2023 American Community Survey 5-Year Estimates were used to analyze the social, economic, housing, and general demographic characteristics of Lehigh County. The 5-year estimates are the most recent data available for the County. The 2020 U.S. Census data is included where possible.

Lehigh County's overall population:

- Between 2010 and 2023, the population increased by approximately 7.41%, rising from 349,497 to 375,408.

Lehigh County's age of population:

- The median age in Lehigh County is 39.8 years old.
- Youth under age 18 account for 22.2% of the population.
- Adults between the ages of 35 and 60 account for 32.0% of the population.
- Adults that are 62 years and old account for 21.73% of the population.

Racial/ethnic composition of Lehigh County from the 2019-2023 U.S. American Community Survey 5-Year Estimates:

- 66.77% are White
- 26.96% are Hispanic
- 6.94% are Black or African American
- 3.51% are Asian
- 0.33% are American Indian and Alaska Native
- 9.63% are Some Other Race
- 12.78% are Two or More Races

The median income for families in Lehigh County was \$94,059 for 2023. At the time of the 2019-2023 American Community Survey, median household income in Lehigh County was \$77,493 which was higher than the Commonwealth of Pennsylvania (\$76,081).

In Lehigh County, the overall percentage of low- and moderate-income (LMI) persons was 29.73% in 2024, while the First Quartile Low/Mod rate established by HUD is 44.20%. A total of 20 census tract and block groups across the County had a majority (i.e., more than 51.0%) of people with incomes at or below 80% of the Median Family Income (MFI). A total of 38 block groups in the County had a Low/Mod rate equal to or greater than the First Quartile Low/Mod rate of 44.20%.

According to the U.S. Labor Department, the non-seasonally adjusted preliminary unemployment rate for Lehigh County in March 2025 was 4.1%, which was slightly higher than the seasonally adjusted preliminary rate of 3.8% for the Commonwealth of Pennsylvania. The seasonally adjusted national unemployment rate for March 2025 was 4.2%.

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

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

Geographic Distribution

Target Area	Percentage of Funds
County wide	100%

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The proposed activities and projects for FY 2025 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:

- Block Group 1, Census Tract 68, Lehigh County, Pennsylvania
- Block Group 2, Census Tract 61.02, Lehigh County, Pennsylvania
- Block Group 4, Census Tract 68, Lehigh County, Pennsylvania
- Block Group 3, Census Tract 57.03, Lehigh County, Pennsylvania
- Block Group 5, Census Tract 67.01, Lehigh County, Pennsylvania
- Block Group 2, Census Tract 65, Lehigh County, Pennsylvania
- Block Group 3, Census Tract 56.02, Lehigh County, Pennsylvania
- Block Group 1, Census Tract 59.02, Lehigh County, Pennsylvania
- Block Group 4, Census Tract 67.01, Lehigh County, Pennsylvania
- Block Group 3, Census Tract 52, Lehigh County, Pennsylvania
- Block Group 3, Census Tract 51, Lehigh County, Pennsylvania
- Block Group 1, Census Tract 58, Lehigh County, Pennsylvania
- Block Group 2, Census Tract 51, Lehigh County, Pennsylvania
- Block Group 3, Census Tract 59.01, Lehigh County, Pennsylvania
- Block Group 1, Census Tract 55.03, Lehigh County, Pennsylvania
- Block Group 2, Census Tract 60.01, Lehigh County, Pennsylvania
- Block Group 1, Census Tract 63.03, Lehigh County, Pennsylvania

- Block Group 4, Census Tract 56.02, Lehigh County, Pennsylvania
- Block Group 3, Census Tract 57.05, Lehigh County, Pennsylvania
- Block Group 2, Census Tract 57.03, Lehigh County, Pennsylvania

Additionally, because Lehigh County is an exception grantee that use the upper quartile standard, all Census Tracts where at least 44.20% of households with low- and moderate-incomes are CDBG eligible. The following Census Tracts and Block Groups are eligible:

- Block Group 5, Census Tract 65, Lehigh County, Pennsylvania
- Block Group 1, Census Tract 63.05, Lehigh County, Pennsylvania
- Block Group 3, Census Tract 58, Lehigh County, Pennsylvania
- Block Group 1, Census Tract 57.02, Lehigh County, Pennsylvania
- Block Group 1, Census Tract 57.04, Lehigh County, Pennsylvania
- Block Group 1, Census Tract 64.01, Lehigh County, Pennsylvania
- Block Group 3, Census Tract 57.02, Lehigh County, Pennsylvania
- Block Group 4, Census Tract 63.05, Lehigh County, Pennsylvania
- Block Group 4, Census Tract 65, Lehigh County, Pennsylvania
- Block Group 1, Census Tract 53.02, Lehigh County, Pennsylvania
- Block Group 2, Census Tract 63.12, Lehigh County, Pennsylvania
- Block Group 3, Census Tract 68, Lehigh County, Pennsylvania
- Block Group 2, Census Tract 68, Lehigh County, Pennsylvania
- Block Group 2, Census Tract 62.04, Lehigh County, Pennsylvania
- Block Group 2, Census Tract 63.03, Lehigh County, Pennsylvania
- Block Group 4, Census Tract 51, Lehigh County, Pennsylvania
- Block Group 2, Census Tract 69.02, Lehigh County, Pennsylvania
- Block Group 1, Census Tract 61.02, Lehigh County, Pennsylvania

Discussion

The geographic locations and the public benefit for the FY 2025 CDBG Activities/Projects are as follows:

- **Black Heritage Association of the Lehigh Valley – Section 3 Contractor and Worker Training** - County-wide, excluding Lower Milford Township and the cities of Allentown and Bethlehem; Fountain Hill area (address kept confidential for safety of survivors); Low/Mod Clientele (LMC).
- **North Penn Legal Services – Fair Housing Outreach** - County-wide, excluding Lower Milford Township and the cities of Allentown and Bethlehem; 1501 Lehigh Street, Suite 206, Allentown, PA 18103; Low/Mod Clientele (LMC).
- **CDBG Administration** - County-wide, excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Clientele (LMC).
- **Aspire – Mental Health Therapy** - County-wide, excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Clientele (LMC).

- **Big Brothers Big Sisters – Bigs Mentoring Program** - County-wide excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Clientele (LMC).
- **Communities in Schools - LCTI Support** - County-wide excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Clientele (LMC).
- **LVCIL - PLACE** - County-wide excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Clientele (LMC).
- **Manito – Therapeutic Riding** - County-wide excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Clientele (LMC).
- **North Penn Legal Services – Legal Help Project** - County-wide excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Clientele (LMC).
- **Parkland CARES – Food Pantry** - County-wide excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Clientele (LMC).
- **CALV – Second Harvest Food Bank** - County-wide excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Clientele (LMC).
- **CALV – Roof and HVAC Replacement** - County-wide excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Clientele (LMC).
- **Catasauqua Borough – Street Reconstruction** - County-wide; Catasauqua Borough; Wood Street (2nd and Front Street) and Strawberry (between 2nd and Front); Low/Mod Area (LMA)
- **Coplay Borough – Fire Equipment Replacement** - County-wide; Coplay Borough; Low/Mod Area (LMA).
- **Emmaus Borough – Curb Cuts** - County-wide; Emmaus Borough; Low/Mod Area (LMA).
- **Fountain Hill Borough – Street Reconstruction** - County-wide; Fountain Hill Borough, Hertzog Avenue between Broadway and Moravia; Low/Mod Area (LMA).
- **Slatington Borough – Street Reconstruction** - County-wide; Slatington Borough, W. South Street, 5th St. to 4th St; W. South Street, 4th St. to Main St; and E. Washington Street, Hill St. to S. Walnut St.; Low/Mod Area (LMA).
- **Slatington Borough – Road Reconstruction** – County-wide; Slatington Borough, W Hill Street between East Church and East Washington Street.; Low/Mod Area (LMA).

The geographic locations and the public benefit for the FY 2025 HOME Projects/Activities are as follows:

- **Home Administration** - County-wide excluding Lower Milford Township and the cities of Allentown and Bethlehem.
- **CHDO Set-Aside** – County-wide excluding Lower Milford Township and the cities of Allentown and Bethlehem.
- **Soteria / Cortex – Urban Place** – County-wide excluding Lower Milford Township and the cities of Allentown and Bethlehem.
- **Calvary Temple – Willows at Calvary** – County-wide excluding Lower Milford Township and the cities of Allentown and Bethlehem.

AP-55 Affordable Housing – 91.220(g)

Introduction

Lehigh County will utilize its CDBG and HOME funds to develop affordable housing units in the County. The one year goals for affordable housing in Lehigh County for FY 2025 are as follows:

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

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	5
Rehab of Existing Units	25
Acquisition of Existing Units	0
Total:	30

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

Discussion

Lehigh County will fund the following projects with CDBG and HOME funds:

- **CALV – Urgent Need Roof and HVAC Replacement Program** - CALV's Lehigh County Roof and HVAC Repair and Replacement Program aims to assist homeowners residing in Lehigh County (outside city limits) whose incomes are at or below 80% of the Area Median Income (AMI) and whose homes are in urgent need of roof and/or HVAC system repair or replacement. This program will enhance housing safety and quality for twenty-five (25) eligible homeowners, contributing to better living conditions, health, and stability.
- **CHDO Set-Aside** - HOME funds will be used to assist a CHDO to increase the number of affordable housing units in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation. (1 Housing Unit)
- **Soteria / Cortex – Urban Place Apartments** - HOME funds will be used to assist in the development of 4 affordable housing rental units at the Mill II development in Fountain Hill for income eligible renters. (2 Housing Units)
- **Calvary Temple – Willows at Calvary** - HOME funds will be used to assist in the development of affordable housing in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation. (2 Housing Units)

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 \$671,240.00 under a HUD Capital Fund grant for FY 2025.

The Lehigh County Housing Authority (LCHA) maintains 364 units of public housing and has a 97.57% occupancy rate. LCHA has a baseline of 1,672 Section 8 Housing Choice Vouchers, with 311 applications on the waiting list. The Lehigh County Housing Authority has selected residents to access and review its Annual Action Plan when available. The family housing waiting lists and senior housing waiting lists are both open.

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 the Individual's Training and Service Plan. LCHA has a baseline of 1,672 Section 8 Housing Choice Vouchers, with 311 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

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 2025, the following numbers of homeless persons were reported in Lehigh County:

- **Unsheltered** - 124 individuals, 0 families with children, and 0 children only
- **Transitional Housing** - 59 individuals, 14 families with children, and 0 children only
- **Emergency Shelter** - 218 individuals, 111 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 – Case Management and Rent Assistance 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 22 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.

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.

As of the 2025 Eastern PA CoC Housing Inventory Count, the shelter and transitional housing that is available in Lehigh County included the following:

- Allentown Rescue Mission (Emergency Shelter)
- Allentown Rescue Mission Christian Living and Values Transitional Program (Transitional Housing)
- Bright Hope Pregnancy Support (Transitional Housing)
- Community Action Committee of the Lehigh Valley - Sixth Street Shelter (Emergency Shelter)
- Family Promise of Lehigh Valley (Emergency Shelter)
- Greater YMCA – Allentown Branch (Emergency Shelter)
- Salvation Army Emergency Shelter (Emergency Shelter)

- Turning Point of the Lehigh Valley (Domestic Violence) (Emergency Shelter)
- Valley Youth House (Emergency Shelter)
- Valley Youth House (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 2024. 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 57 Rapid Rehousing beds in Lehigh Valley; 20 of these 57 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, childcare, transportation, and other resources to promote long-term stability for persons and their families that have transitioned out of homelessness. There are also 214 Permanent Supportive Housing beds dedicated to chronically homeless individuals in Lehigh Valley.

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 problem in the Lehigh Valley area. It is estimated that nearly 10% of the homeless people in the area fall into the 18-24 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.

Turning Point of the Lehigh Valley will provide housing to victims of domestic violence and their families. They provide 26 emergency shelter 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 homeless people, the Federal government cut funding for the program.

Discussion

Lehigh County is a member of the Eastern Pennsylvania Continuum of Care Network, PA-509 Continuum of Care, administered by the Lehigh Valley Regional Homeless Advisory Board (RHAB).

The Lehigh Valley Regional Homeless Advisory Board was allocated FY 2024 funding to the following projects:

- **Catholic Social Services of the Diocese of Scranton, Inc. - PA0386-Rural Permanent Supportive Housing - \$152,045**
- **Catholic Social Services of the Diocese of Scranton, Inc. - PA0519-PSHP Pike County - \$129,039**
- **Catholic Social Services of the Diocese of Scranton, Inc. - PA0450-Susquehanna/Wayne PSHP - \$138,988**
- **Center for Community Action - PA0813 South Central PA 2024 RRH - \$357,351**
- **Center for Community Action - PA0661 Bedford, Fulton, Huntingdon 2024 RRH - \$131,959**
- **Center for Community Action - PA0372 Blair CAP - Rapid Re-Housing Program - \$1,210,041**
- **Center for Community Action - PA1138 Central Valley JMSU RRH - \$387,177**
- **Centre County Government - PA0814 Centre County Rapid Re-Housing Program - \$435,419**
- **Clinton County Housing Coalition, Inc. - PA0966 CCHC Regional Rapid Rehousing FY2024 - \$259,941**
- **Commonwealth of Pennsylvania - PA0188 Commonwealth of PA HMIS (PA-509) FY2024 - \$394,946**
- **Commonwealth of Pennsylvania - PA-509 CoC Planning Project Application FY2024 (PA0964) - \$1,140,791**
- **County of Franklin - PA0182 - Franklin/Fulton Homeless Assistance Project - \$313,663**
- **County of Franklin - PA0649 - Franklin/Fulton S+C Project - \$112,990**
- **Fitzmaurice Community Services, Inc - PA0214 - Pathfinders PSH - \$284,177**
- **Housing Authority of the County of Cumberland - PA0447 - PSH Consolidated - \$747,537**
- **Housing Authority of the County of Cumberland - PA0812 - Rapid Rehousing Cumberland Perry Lebanon - \$193,186**
- **Housing Authority of the County of Cumberland - PA0177 Perry County Veterans Program - \$54,091**
- **Housing Authority of the County of Cumberland - PA0514 Perry County Rapid Rehousing - \$238,316**
- **Housing Development Corporation of NEPA - PA0384 HDC SHP 3 2024 - \$201,898**
- **Housing Development Corporation of NEPA - PA0582 HDC SHP 6 2024 - \$195,296**
- **Housing Transitions, Inc. - PA0176 Nittany House Apartments - \$298,613**
- **Lehigh County Housing Authority - PA0215 LCHA S+C 2024 - \$299,458**
- **Monroe, County of - PA1087 - Pocono Mountains Rapid-Rehousing Project FY2024 - \$312,561**
- **New Bethany, Inc. - PA1086 New Bethany Rapid Rehousing FY2024 - \$164,380**
- **Northern Cambria Community Development Corporation - PA0360 Independence Gardens - \$316,868**
- **Pennsylvania Coalition Against Domestic Violence - PA1137 FY 24 NEW Eastern PA CoC DV RRH**

- \$2,102,686
- **Pennsylvania Coalition Against Domestic Violence - PA1119 Eastern PA CoC DV CE Extension Renewal FY24 - \$331,027**
- **Pennsylvania Coalition Against Domestic Violence - PA1088 Eastern PA CoC DV RRH Consolidation Renewal FY24 - \$7,049,236**
- **Pennsylvania Coalition Against Domestic Violence - PA0927 Coordinated Entry Specialist for Domestic Violence - \$90,341**
- **Pennsylvania Coalition Against Domestic Violence - PA1137 FY24 NEW Eastern PA CoC DV RRH Expansion - \$3,445,453**
- **Resources for Human Development, Inc. - PA0205-Crossroads Family - \$317,022**
- **Resources for Human Development, Inc. - PA0206-Crossroads Individual - \$453,046**
- **Resources for Human Development, Inc. - PA0449-Crossroads Housing Bonus Expansion - \$244,022**
- **Service Access and Management Inc. - PA1031 Rapid Re-Housing Franklin County - \$174,897**
- **Tableland Services, Inc. - PA0705 Consolidated Permanent Supportive Housing with Disabilities - \$448,983**
- **Tableland Services, Inc. - PA0366 SHP Rapid Re-Housing Project - \$173,199**
- **The Lehigh Conference of Churches - PA0213 - Outreach and Case Management for the Disabled, Chronically Homeless - \$75,838**
- **The Lehigh Conference of Churches - PA1029 - Pathways RRH - \$479,346**
- **The Lehigh Conference of Churches - PA0222 - Pathways Permanent Supportive Housing Consolidation - \$1,336,584**
- **The Salvation Army, a New York Corporation - Salvation Army Carlisle PH Project - \$92,526**
- **The Salvation Army, a New York Corporation - Allentown Hospitality House Permanent Housing Program - \$221,088**
- **Third Street Alliance for Women & Children - PA0811_Third Street Alliance_Lehigh Valley Rapid ReHousing Program - \$465,955**
- **Transitions of PA - PA0859 SUN Counties Rapid Re-Housing for Domestic Violence Victims - \$124,496**
- **Transitions of PA - PA1139 Transitions of PA PSH for Snyder and Northumberland Counties - \$87,757**
- **Transitions of PA - PA0445 Transitions of PA Permanent Supportive Housing - \$268,391**
- **United Way of Pennsylvania - PA1084 Enhanced East CES Expansion - \$192,026**
- **United Way of Pennsylvania - PA1084 Enhanced East CES - \$349,125**
- **United Way of Pennsylvania - PA 0736 - Connect To Home Coordinated Entry Project - \$651,410**
- **Valley Housing Development Corporation - PA0216-VHDC SHP #2/3 2024 - \$500,525**
- **Valley Youth House Committee, Inc. - PA0808 - Lehigh Valley RRH for families - \$374,725**
- **Valley Youth House Committee, Inc. - PA0887 - TH-RRH for Lehigh Valley Youth - \$734,063**

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 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.
- **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.
- **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.
- **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.
- **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.

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

North Penn Legal Services (NPLS) is a subrecipient of FY 2025 CDBG funds from Lehigh County. NPLS is funded as a public service activity and provides legal aid related to affordable housing, serving low- and moderate-income residents living in Lehigh County outside of Allentown and Bethlehem. NPLS staff provides assistance to residents who face eviction, are denied housing, or are forced to live in uninhabitable conditions. This activity is conducted through workshops held at local social service agencies and in mobile home parks. Information on foreclosures, consumer issues, and fair housing is also provided to the residents of Lehigh County.

In addition, NPLS monitors housing practices and counsels victims of discrimination. NPLS policies and activities promote the awareness of fair housing requirements. They provide consultation to developers and municipalities to ensure that rental and for-sale units are marketed in accordance with the affirmative marketing rules of the U.S. Department of Housing and Urban Development. NPLS ensures that all housing programs and services provided by Lehigh County, its municipalities, and NPLS itself, are administered in

a way that promotes fair housing on the basis of race, national origin, religion, gender, disability, and familial status. NPLS' fundamental mission is to increase access to affordable housing for all persons.

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

The Lehigh Valley Planning Commission's plans to continue to offer the "Beyond Codes: Fair Housing and Inclusionary Zoning" presentation in partnership with North Penn Legal Services to municipalities, their officials, planning commissions and chief administrators. The presentation explains the differences between the Fair Housing Act, inclusionary zoning, and the Uniform Construction Code (PA's building code), as well as what the rights and the obligations are of the municipalities in abiding by the federal and state fair housing regulations. It also offers examples of what municipalities can and cannot do in zoning practice, subdivision and land development regulations, and zoning administration.

Discussion

The Lehigh Valley Planning Commission (LVPC) developed and is promoting the use of their model ordinances for inclusionary zoning. The model ordinances were made public and are available through the LVPC website (www.lvpc.org) and the LVPC office. They have been praised by HUD as the standard for Pennsylvania communities to adopt. The titles of the model ordinance and guidance documents include the following: Conservation Subdivisions, Cottage Housing Development, Density Bonuses/Minimum Density, Inclusionary Zoning, Street Connectivity, Traditional Neighborhood Development, and Mixed-Use Zoning and Development.

To further promote Fair Housing, the following actions will be implemented by Lehigh County through its Fair Housing Plan by Affirmatively Furthering Fair Housing through various activities noted below:

1. A Fair Housing Officer has been appointed to administer (responsibilities include accepting complaints, record keeping and investigation in conjunction with NPLS).
2. Continue to enlist NPLS in the enforcement of fair housing through public education and outreach.
3. Continue to fund fair housing providers to report housing discrimination complaints.
4. Continue to investigate testing and auditing of fair housing practices through its regional fair housing providers.
5. Educate and attempt to overcome the "Not in My Back Yard" (NIMBY) attitude throughout the County through its fair housing providers.
6. Make every attempt to increase geographic choice in housing by providing links on its website for its low-income households.
7. Promote desegregation of public housing.

8. Update its fair housing section on the County website with news and items regarding fair housing (i.e. links to fair housing providers to report housing discrimination).
9. Assist in the organization of a federally supported community-based system (such as LANTA) that organizes key elements in its community to direct attention to, and help develop strategies to, affirmatively further fair housing.
10. On an annual basis, Lehigh County will declare, via proclamation, April to be Fair Housing Month.
11. Outreach to public – provide updated Housing Discrimination information.

DRAFT

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. Home funds could be provided to developers who reserve 10% of the housing units for affordable housing.
- 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 and development initiative for affordable housing. 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 2024-2028 Five Year Consolidated Plan, Lehigh County proposes to foster and maintain affordable housing through the following Five-Year goals and Strategies:

HOUSING STRATEGY - HS**Need:**

The County has been experiencing a growth in population and an influx of lower income persons which has created a housing shortage, especially affordable housing.

Goal:

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

Objectives:

- **HS-1 Housing Development** – Increase the number of decent, safe, sanitary, accessible, and affordable housing units in the County, both for owner-occupied and rental-occupied housing.
- **HS-2 Homeownership** – Increase the opportunities for homeownership for low- and moderate-income households through downpayment/closing cost assistance, and housing counseling services.
- **HS-3 Housing Rehabilitation** – Promote and assist in the preservation of owner-occupied and renter-occupied affordable housing stock in the County.
- **HS-4 Rent and Utility Assistance** – Promote housing stability through rental assistance, utility payments, and deposits for low- and moderate-income tenants who are at risk of becoming homeless.
- **HS-5 Fair Housing** – Affirmatively further fair housing by promoting and informing households on their rights and educating landlords, realtors, mortgage companies, sellers, etc. on fair housing practices which will reduce discrimination in housing.
- **HS-6 Housing Supportive Services** – Promote and assist low- and moderate-income households to locate and/or remain in affordable housing through housing counseling and supportive services.

Lehigh County will address the following goal in the FY 2025 Annual Action Plan:

- **North Penn Legal Services – Fair Housing Outreach** - NPLS will support Fair Housing Outreach with housing-related legal help to low-income people in Lehigh County with educational outreach, online resources, and printed self-help materials.
- **North Penn Legal Services – Legal Help Project** - NPLS will continue to provide housing-related legal help to low-income people in Lehigh County.
- **CALV –Roof and HVAC Replacement** - CALV's Lehigh County Roof and HVAC Repair and Replacement Program aims to assist homeowners residing in Lehigh County (outside city limits) whose incomes are at or below 80% of the Area Median Income (AMI) and whose homes are in urgent need of roof and/or HVAC system repair or replacement. This program will enhance

housing safety and quality for ten (10) eligible homeowners, contributing to better living conditions, health, and stability.

- **LVCIL – PLACE** - The PLACE (People Living in Accessible Community Environments) program will provide housing counseling services to 25 Lehigh County residents with disabilities, and their family members, who are living on limited income and may be at-risk of losing their housing.
- **CHDO Set-Aside** – HOME funds will be used to assist a CHDO to increase the number of affordable housing units in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.
- **Soteria / Cortex – Urban Place Apartments** – HOME funds will be used to assist in the development of affordable housing in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.
- **Calvary Temple – Willows at Calvary** – HOME funds will be used to assist in the development of affordable housing in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.

Actions planned to reduce lead-based paint hazards

Lehigh County is working to reduce potential lead-based paint hazards. Below are the County's activities to reduce lead-based paint hazards are related to rehabilitation and homeownership programs.

Rehabilitation Programs

Lehigh County will continue to 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, Subpart R.
- 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 adhere to ongoing lead-based paint maintenance activities, when applicable.
- Program staff monitors owner compliance with ongoing lead-based paint maintenance activities.

Homeownership Programs

Lehigh County will ensure that:

- Applicants for homeownership assistance receive adequate information about lead-based paint requirements.
- County staff properly determine whether proposed projects are exempt from some or all lead based paint requirements.
- A visual assessment is performed to identify deteriorated paint in the dwelling unit, any common areas servicing the unit, and exterior surfaces of the building.
- 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, Subpart R.
- The home buyer receives the required lead-based paint pamphlet and notices.

Lead reduction involves the implementation of a lead-based paint treatment program which will be carried out in conjunction with the County's CDBG and HOME funded housing projects/activities.

Actions planned to reduce the number of poverty-level families

Approximately 11.9% of Lehigh County's residents live in poverty, closely matching the Commonwealth of Pennsylvania's poverty rate of 11.8%. Female-headed households in the County with children are particularly affected by poverty at 31.5%. For comparison, 21.4% of the City of Allentown's residents (about 1/3 of Lehigh County's total population) live in poverty, which gives an approximate poverty rate of 7.1% in the rest of the County.

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

In Lehigh County, the Community Action Committee of the Lehigh Valley (CACLV) is the official anti-poverty agency. CACLV provides rent and utility assistance, case management, and counseling services to assist with financial management, benefit entitlement assistance, home weatherization to reduce utility costs, furniture and household goods, alcohol and mental health counseling, foreclosure mitigation counseling, child care, college readiness, pardon and expungement assistance, 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 four (4) projects with FY 2025 CDBG funds to assist residents and families living in poverty:

- Big Brothers Big Sisters – Bigs Mentoring Program
- Communities in Schools – LCTI Support
- Parkland CARES – Food Pantry
- CALV – Second Harvest Food Bank

Additionally, Lehigh County funded two projects with FY 2025 funds to assist residents and families living in poverty:

- CHDO Set-Aside
- Soteria / Cortex – Urban Place Apartments
- Calvary Temple – Willows at Calvary

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 2025, the partnership includes the following agencies:

- Aspire Big
- Brothers Big Sisters

- Black Heritage Association of the Lehigh Valley
- Catholic Charities, Diocese of Allentown
- Communities in Schools of Eastern Pennsylvania
- Lehigh Career & Technical Institute
- Meals on Wheels of the Greater Lehigh Valley
- Lehigh Valley Center for Independent Living (LVCIL)
- Lehigh Valley Regional Homeless Advisory Board
- Manito
- Meals on Wheels of the Greater Lehigh Valley
- North Penn Legal Services
- Parkland CARES

Lehigh County consulted 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
- Local elected officials

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 \$30,000.00 in FY 2024 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 County is also funding the Black Heritage Association of Lehigh Valley for \$20,000 to promote section 3 certification, outreach and registry.

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.

DRAFT

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

Introduction

Lehigh County receives an annual allocation of CDBG and HOME funds. The County does not expect to generate program income from any CDBG funded activities in FY 2025. Since the County receives a CDBG Federal allocation, the questions below have been completed, as applicable.

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

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

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

Other CDBG Requirements

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

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)**

- 1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:**

Lehigh County does not intend to use any other forms of investment other than those described in 24 CFR 92.205(b). Not Applicable.

- 2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:**

See attached Resale/Recapture Policy in the Appendix Section of the FY 2025 Annual Action Plan.

- 3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:**

Not Applicable.

- 4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:**

Lehigh County does not intend to refinance any existing debt for multifamily housing that will be rehabilitated with HOME Funds. Not Applicable.

- 5. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209 (c)(2)(iii) and 91.220(l)(2)(vii)).**

Lehigh County does not intend to fund a TBRA with HOME funds. Not Applicable.

- 6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).**

Lehigh County does not intend to fund a TBRA with HOME funds. Not Applicable.

- 7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that**

limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Not Applicable.

Discussion

Does the County plan to limit beneficiaries or give preferences to a particular segment of the low-income population?

Lehigh County does not limit the beneficiaries or give preferences to a particular segment of the low-income population. The County assists on a first come, first serve basis for its HOME activities.

CDBG Program Income:

- Lehigh County does not anticipate the receipt of Program Income during this program year.

CDBG Percentages:

- Administrative Percentage: 20%
- Public Service Percentage: 12%
- Low- and Moderate-Income Percentage: 100%
- Slum and Blight Percentage: 0.0%

HOME Program:

Lehigh County became a new HOME Entitlement Community in FY 2022 and is in the process of preparing a HOME Funding Request Application to be completed by potential applicants for HOME funds. The Funding Request Application was released as part of the FY 2023 Annual Action Plan planning process. The County will continue to take applications based on projects use of HOME funds assist in the development of affordable housing in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.

HOME Program Income:

- Lehigh County does not anticipate the receipt of Program Income during this program year.

HOME Percentages:

- Administrative Percentage: 8.5%
- CHDO Set-A-Side: 15%



CITIZEN PARTICIPATION



FIRST PUBLIC HEARING

**LEHIGH COUNTY, PENNSYLVANIA
FY 2025 COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)
And HOME INVESTMENT PARTNERSHIPS PROGRAM**

**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 two (2) public hearings on March 25, 2025, at 3:00 pm, via Zoom, and March 27, 2025, at 10:00 am, prevailing time in Room 524 of the Lehigh County Government Center, 17 South 7th Street, Allentown, PA. To participate in the virtual public hearing on March 25, 2025, please email the Dept. of Community Development at LCommDev@lehighcounty.org, or call (610) 782-3565. If special arrangements need to be made to accommodate residents in order for them to participate in either public hearing, please call the Office of Community Development, at (610) 782-3565 (PA Relay Center TDD, 7-1-1) to make those arrangements.

The purpose of the public hearings is to gather information on the Annual Action Plan for FY 2025, which the County must submit to the U.S. Department of Housing and Urban Development for the Community Development Block Grant (CDBG) Entitlement Funds and the HOME Investment Partnership Program. The County will afford non-profits, housing developers, municipal jurisdictions, and public service agencies the opportunity to request funds for projects and activities.

The actual allocation of funds that Lehigh County is eligible to receive is not known at this time since it has not been determined by HUD. It is anticipated that the FY 2025 allocations will be comparable to FY 2024. In FY 2024, Lehigh County received \$1,182,005 in CDBG funds and \$457,582.73 in HOME funds. In order to receive funds, Lehigh County must prepare a One Year Annual Action Plan for the use of the funding. At least 70% of the CDBG funds must benefit low- and moderate-income persons. The County intends to afford citizens, local agencies, and interested parties 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 which can be found at <https://www.lehighcounty.org/Departments/Community-Economic-Development>. Applications must be received by April 15, 2025 via email to LCommDev@lehighcounty.org, or via mail (postmark deadline of April 15, 2025) to the Lehigh County Office of Community Development, Government Center, Room 519, 17 South 7th Street, Allentown, PA 18101.

All interested persons are encouraged to attend the public hearings and to present oral or written testimony concerning the needs of Lehigh County residents and the use of CDBG and HOME funds over the next year. Written comments may be addressed to LCommDev@lehighcounty.org or given by telephone, (610) 871-1964.

Run Ad 3/14/24, legal section

Proof of Publication Notice in the *Morning Call*

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

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

STATE OF PENNSYLVANIA)
COUNTY OF LEHIGH) SS:

Jim Feher

of THE MORNING CALL, LLC. of the County of Lehigh and State of Pennsylvania, 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 in the City of Allentown, County of Lehigh and State of Pennsylvania, 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.:

Mar 14, 2025.

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.

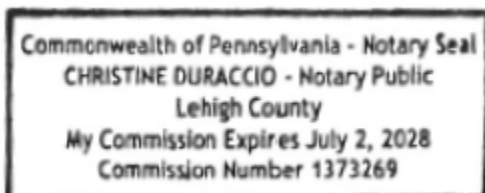


Designated Agent, THE MORNING CALL, LLC.

Sworn to and subscribed before me on this 15 day of March, 2025



Notary Public



Order # - 7782389

Proof of Publication Notice in the *Morning Call*

LEHIGH COUNTY,
PENNSYLVANIA
FY 2025 COMMUNITY
DEVELOPMENT BLOCK GRANT
(CDBG)

And HOME INVESTMENT
PARTNERSHIPS PROGRAM

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Proof of Publication Notice in the *Morning Call*

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7782389 3/14/25

Order # - 7782389

PUBLIC HEARING 1 and APPLICATION WORKSHOP

March 2025

Lehigh County
Department of Community &
Economic Development

Frank Kane, Director

Agenda



- Introductions
- Purpose of the Public Hearings
- Anticipated Funding
 - Annual Plan Schedule
- Application & Evaluation Process
 - Consolidated Plan Goals
 - Scoring for CDBG
- Funding Overview
 - Eligible Activities for HOME
 - Detailed overview with project discussion available by request
 - CDBG Overview
 - Eligible Activities
 - National Objectives
- Grant Requirements
- Q & A and Comments on Lehigh County's CDBG Program

INTRODUCTIONS

Meet the Team

- **Department Director** – Frank Kane
- **Grants Management Specialist** – Laurie Moyer
- **Grants and Projects Manager** – George Samuelson
- **Executive Assistant** – Cyndi King

PUBLIC HEARINGS - PURPOSE

Public Hearings

- The purpose of the public hearings:
 - Collect comments from citizens, municipalities, and public service providers on the needs of LMI individuals and communities in Lehigh County, and how CDBG and HOME can help.
 - Discuss the application process, including eligibility and fundability.
 - Bring awareness of administration requirements to potential applicants.

ANTICIPATED FUNDING

Anticipated Funding

- The County receives “entitlement” funding from the U.S. Dept. of HUD on an annual basis.
 - Community Development Block Grant (CDBG): \$1,182,005
- As of FY 2022, Lehigh County is also a “PJ”
 - HOME Investment Partnerships (HOME): \$457,582

Annual Plan Schedule – FY 2025

- **Process Timeline**

- Application Deadline: April 15, 2025
- Awards to be Determined by May 30th
- 30 Day Comment Period begins June 30th
- Public Hearing July 15th at 12 pm in Room 524
- Annual Plan Submitted to HUD by August 15, 2025
- HUD Review of Action Plan: +/- 45 Days
- HUD Release of Funds

Program Year: October 1, 2025 thru September 30, 2026

APPLICATION & EVALUATION PROCESS

Application Process

- Application forms for grants can be found at: <https://www.lehighcounty.org/Departments/Community-Economic-Development/CDBG-HOME-and-CHDO-Applications>
- Lehigh County solicits proposals for federally-funded initiatives in accordance with identified priorities & needs, and are awarded on a competitive basis.

Consolidated Plan Goals

- **Projects must fit into a goal and a strategy**
 - <https://www.lehighcounty.org/Departments/Community-Economic-Development/CDBG-Grant-Application>
 - Find the list on the left of the page
 - “FY 2024-2028 Consolidated Plan Goals”
 - Goals
 - Housing – improve, preserve, and expand affordable housing supply (6 strategies)
 - Homeless – improve living conditions and services for the homeless (4 strategies)
 - Other Special Needs – improve, preserve, and expand facilities for persons with special needs and the disabled (5 strategies)
 - Community Development – improve, preserve, and create new public and community facilities, infrastructure, and public services (7 strategies)
 - Economic Development – increase and promote job creation, job retention, self-sufficiency, education, job training, technical assistance and economic empowerment of LMI residents (5 strategies)
 - Administration and Planning (3 strategies)

Scoring Criteria - CDBG Applications

Construction Projects

- Projects located in a low- to moderate-income (LMI) municipality will receive priority consideration for funding. Municipalities designated as LMI are Coplay, Hanover, Fountain Hill, Macungie, and Slatington. The percent of LMI individuals living within the census block groups of these municipalities averages at least 44.5%.
 - Projects must meet one of Lehigh County's Five-Year Consolidated Plan goals.
- Consideration will also be given to projects not located in an LMI community. Such projects should meet the following criteria:
 - Ability of the new project to be completed between January 1, 2026 and August 31, 2026.
 - Applicability to Lehigh County's Five-Year Consolidated Plan goals.
 - Hard cost match of 10% of request is dedicated by the applicant to completing project construction.
 - CDBG request doesn't exceed \$125,000.

Public Services

- Projects not funded via FY 2024: applications will be accepted for new or existing services. Applications for existing services must prove at least a 40% quantifiable increase in the need for the service over the past 12 months.
 - On the CDBG application webpage, there are examples illustrating public services and quantifiable increase in need. Please reference this page, entitled "Quantifiable Increase for Public Services" for details on satisfying the documentation requirements.
- Projects funded via FY 2024 and asking for an increase in funding must provide data proving that there was at least a 40% quantifiable increase in the need for services over the past 12 months.
- Projects funded via FY 2024 and not asking for an increase in funding do not need to prove an increase in need.
- All projects must fit into Lehigh County's Five-Year Consolidated Plan goals and substantiate the ability to spend down the requested amount between October 1, 2025 and September 31, 2026.

CDBG – Eligible Activities

Public Service Eligibility Worksheet

1. Was this project funded via 2024 CDBG?
 - ☐ Yes – go to Question 2.
 - ☐ No – go to Question 3.
2. Are you requesting the same amount (or less than) the amount awarded via 2024 CDBG for the same project?
 - ☐ Yes – skip the rest of this Public Service Project Worksheet section. (The Public Service eligibility requirements have been met.)
 - ☐ No – go to question 3.
3. Is this a new project being offered by your agency?
 - ☐ Yes - skip the rest of this Public Service Project Worksheet section. (The Public Service eligibility requirements have been met.)
 - ☐ No – go to question 4.
4. Are you able to prove a quantifiable increase in need over the past 12 months, enabling the proposed project to be funded?
 - ☐ Yes – go to question 5.
 - ☐ No – If the project was funded via 2024 CDBG, the project can only request the same amount as previously awarded. If the project is not new, and did not receive 2024 CDBG, then the project is ineligible. (Stop here – and do not submit an application.)
5. Please describe the need for the project 12 months ago vs. the current need. Also, describe how the quantifiable data was collected. Qualitative support will not be accepted. If only qualitative support exists, stop here; do not submit an application.

FUNDING OVERVIEW

HOME Investment Partnerships

Eligible HOME Activities and Costs:

- **Hard Costs**
 - New construction of affordable housing
 - Rehabilitation of affordable housing
 - Reconstruction of affordable housing
 - Conversion to affordable housing
 - Site Improvements related to the development of affordable housing
- **Refinancing of existing debt secured by a housing project that is being rehabilitated w/ HOME Funds**
- **Acquisition Costs** – Improved or unimproved
 - Purchase of property by home buyers

HOME Investment Partnerships

Eligible HOME Activities and Costs Continued:

- **Soft Costs necessary for the financing, development, rehabilitation or acquisition of housing using HOME Funds**
 - Architectural, engineering, and related professional services
- **Community Housing Development Organization (CHDO) Costs**
- **Relocation costs for displaced households**
- **Administrative and planning costs**

HOME Investment Partnerships

Eligible HOME Activities and Costs Continued:

- **Other Costs**
 - Fair housing activities to affirmatively further fair housing
 - Downpayment and closing cost assistance
 - Indirect costs as part of a cost allocation plan
 - Preparation of the consolidated plan
 - Compliance and reporting in reference to Federal requirements
 - Tenant-based rental assistance (TBRA)
 - Rental assistance and security deposit payments
 - Utility deposit assistance only if rental or security deposit payments are made
 - Cost of inspecting the housing and determining income eligibility of the household

HOME Investment Partnerships

Ineligible HOME Activities:

- Provide project reserve accounts, except for new construction or rehabilitation of an initial operating deficit reserve during the period of project read-up (not to exceed 18 months)
- Provide tenant-based rental assistance for the special purpose of the existing Section 8 Program
- Provide non-Federal matching contribution required under another Federal Programs
- Provide assistance for uses authorized by Public Housing Capital and Operating Funds
- Prepayment of Low Income Housing Mortgages
- Provide assistance to a homebuyer to acquire housing previously assisted with HOME funds during the period of affordability
- Provide funds for the acquisition of property owned by the participating jurisdiction (P.J.) except for property acquired by the P.J. with HOME funds, or property acquired in anticipation of carrying out a HOME project
- Pay for delinquent taxes, fees or charges on properties to be assisted with HOME funds

CDBG - Overview

HUD Funding – Resources

- CDBG Guide to National Objectives & Eligible Activities:
 - https://www.hudexchange.info/resources/documents/CDBG_Guide_National_Objectives_Eligible_Activities.pdf
- Playing by the Rules: A Handbook for CDBG Subrecipients on Administrative Systems:
 - <https://www.hudexchange.info/resource/687/playing-by-the-rules-a-handbook-for-cdbg-subrecipients-on-administrative-systems/>
- Managing CDBG: A Guidebook for Grantees on Subrecipient Oversight:
 - <https://www.hudexchange.info/resource/6577/managing-cdbg-guidebook-for-cdbg-grantees-on-subrecipient-oversight/>

CDBG - Overview

- **History:** CDBG funded via Title I of Housing & Community Development Act of 1974.
- **Primary Purpose:**
 - Provide Quality Affordable Housing
 - Create Suitable Living Environments
 - Expand Economic Opportunities

CDBG - Overview

National Objectives of the CDBG Program

1. Benefit low- and moderate-income (LMI) persons
 - Minimum 70% of allocation annually
 - Determined by area (census block group or household surveys)
 - Limited Clientele – at least 51% of households served were documented as LMI
 - LMI Household – the individual household is documented as LMI
 - LMI Jobs – an LMI individual holds or will be placed in a job
2. Prevent or eliminate slums or blight
 - Spot or area blight
3. Meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community AND other financial resources are not available

CDBG – “Low/Mod”

- “Low and Moderate Income” (LMI) means a family or household with an annual income less than 80 percent of the area median income.
- Income Limits for CDBG are updated annually. Subrecipients are responsible for ensuring they use the current income limit to capture beneficiary data.

<http://www.huduser.org/portal/datasets/il.html>

5/2/24, 10:59 AM FY 2024 Income Limits Documentation System -- Summary for Lehigh County, Pennsylvania

FY 2024 INCOME LIMITS DOCUMENTATION SYSTEM

[HUD User Home](#) [Data Sets](#) [Fair Market Rents](#) [Section 8 Income Limits](#) [HHS Income Limits](#) [HUD LMI Database](#)

FY 2024 Income Limits Summary

FY 2024 Income Limit Area	Median Family Income <small>Click for More Detail</small>	FY 2024 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Allentown-Bethlehem-Easton, PA HUD Metro FMR Area	\$98,300	Very Low (50%) Income Limits (\$) <small>Click for More Detail</small>	34,450	39,350	44,250	49,150	53,100	57,050	60,950	64,900
		Extremely Low Income Limits (\$)* <small>Click for More Detail</small>	20,650	23,600	26,550	31,200	36,580	41,960	47,340	52,720
		Low (80%) Income Limits (\$) <small>Click for More Detail</small>	55,100	62,950	70,800	78,650	84,950	91,250	97,550	103,850

NOTE: Lehigh County is part of the Allentown-Bethlehem-Easton, PA HUD Metro FMR Area, so all information presented here applies to all of the Allentown-Bethlehem-Easton, PA HUD Metro FMR Area. HUD generally uses the Office of Management and Budget (OMB) area definitions in the calculation of income limit program parameters. However, to ensure that program parameters do not vary significantly due to area definition changes, HUD has used custom geographic definitions for the Allentown-Bethlehem-Easton, PA HUD Metro FMR Area.

The Allentown-Bethlehem-Easton, PA HUD Metro FMR Area contains the following areas: Carbon County, PA; Lehigh County, PA; and Northampton County, PA.

CDBG – National Objective

- **Low/Mod Area Benefit (LMA)**
 - Activities must be open to and benefit all residents of the area
 - Agency must determine service area of activity
 - Area must be primarily residential
 - At least 44.5% of project beneficiaries must be LMI; determined by Census block group
 - Activity Examples:
 - Street Reconstruction
 - Neighborhood cleanups
 - Water/sewer improvements
 - Creation of a neighborhood park

CDBG – National Objective

- **Where are the LMI Areas?**
 - Go to <https://www.lehighcounty.org/Departments/Community-Economic-Development/CDBG-HOME-and-CHDO-Applications>
 - “Low Mod Income Data”
 - Lists all Lehigh County block groups’ LMI percentage
 - Block Group Maps
 - Map of each municipality illustrating block group boundaries
- To determine information on specific addresses:
 - <https://hud.maps.arcgis.com/home/item.html?id=ffd0597e8af24f88b501b7e7f326bedd>
 - Click on “View”, search for a particular address, then click on the map. A box pops up with lots of info, most importantly the census tract, block group, and “lowmod_pct”.

CDBG – National Objective

- **Low/Mod Limited Clientele (LMC):**
 - Activities benefit specific populations of clients
 - Agencies must document that at least 51% of participants are Low/Mod individuals
 - Income Certification/Intake Form
 - Activity Examples:
 - Subsistence Services – max 3 months of rent/utilities
 - Legal services
 - Workforce training for the formerly incarcerated
 - Food pantry

CDBG – National Objective

- **Limited Clientele Presumed Benefit (LMPB):**
 - Activities benefit specific population groups that are presumed to be LMI:
 - Senior Citizens (62+)
 - Homeless Individuals/Families
 - Severely Disabled Adults
 - Person with HIV/AIDS
 - Victims of Domestic Violence
 - Migrant Farm Workers
 - Note: Presumed benefit relates **only** to income.
 - Data regarding race, ethnicity, gender, disability status, veteran status, and the total number of unduplicated clients served in the program **must still comply with HUD regulations.**

CDBG – National Objective

- **Low/Mod Job Creation (LMJ):**
 - Activities to generate economic opportunities
 - Job Creation: Documentation must indicate that at least 51% of the jobs will be held by, or made available to, LMI persons
 - Job Retention: Documentation must indicate that the jobs would have been lost without the CDBG assistance and that at least 51% of the jobs are held by LMI persons and/or the job can “reasonably be expected” to turn over within the following two years and steps will be taken to ensure that the job will be filled by, or made available to, a LMI person
 - Public Benefit Standard: Create or retain at least one full-time, permanent job per \$35,000 of CDBG funds used
 - Typical activities:
 - Business loans, commercial rehabilitation, business technical assistance

CDBG – National Objective

- **Low/Mod Housing (LMH):**
 - Activities to acquire, construct, or improve permanent, residential structures which are/will be occupied by LMI persons.
 - Typical activities:
 - Acquisition of property to be used for permanent housing
 - Rehabilitation of permanent housing, rental or owner-occupied
 - Conversion of nonresidential structures into permanent housing
 - Assistance to a household to enable it to acquire ownership of a home (homeownership assistance).

CDBG - Overview

- **Eligible Activities:**

- Projects must benefit those living in Lehigh County but outside the cities of Allentown and Bethlehem, as well as Lower Milford Township.
- CDBG can support a variety of project types
- Most activities that benefit low- and moderate-income individuals and meet the needs of the community are eligible; **however, the regulations make funding complicated to use.**

CDBG - Overview

- **Primary Eligibility Categories**

- Public Service – maximum of 15% of net allocation
- Public Facility or Infrastructure Improvements
- Affordable Housing

CDBG – Eligible Activities

Public Services: Direct, quantifiable social service delivery to eligible clients.

Activities eligible under this category include (but are not limited to):

- Job Training
- Child Care
- Health Services
- Senior Services
- Afterschool Programs
- Homeless Services
- Domestic Violence Prevention
- Legal Services
- Housing Counseling
- Food Banks

CDBG – Eligible Activities

Public Facility Improvements - improvements to publicly-owned facilities and infrastructure such as streets, playgrounds, and underground utilities, and buildings owned by non-profits that are open to the general public.

Activities eligible under this category include (but are not limited to):

- Rehabilitation or construction of a neighborhood community center
- Rehabilitation or construction of a homeless shelter
- Rehabilitation or construction of facilities serving persons with disabilities
- Improvements to public libraries
- ADA modifications
- Installation of broadband infrastructure
- Housing Authority improvements

CDBG – Eligible Activities

Housing: activities to foster safe, affordable housing opportunities for low/moderate income households.

Activities eligible include:

- Housing rehabilitation programs
- Energy efficiency & weatherization programs
- Conversion of closed buildings to residential use
- Rehabilitation of housing for rent or sale
- Acquisition & site improvements for housing

CDBG – Eligible Activities

Other Eligible Activities

- **Economic Development:** activities to foster economic opportunity, including microenterprise and small business development, commercial and industrial development, and job creation, job retention, and job training activities.
 - Technical assistance and workshops for small businesses
 - Grant programs for small businesses
 - Façade improvement programs
 - Lending programs to for-profits
- **Real Property**
 - Acquisition – fundability based on reuse of property
 - Relocation – expenses to relocate residents during a project
 - Demolition
- **Administration & Planning**

GRANT REQUIREMENTS

Grant Requirements

- Receiving a federal grant through Lehigh County means:
 - Complying with all applicable federal and local requirements
 - Keeping records for at least 5 years after program/project completion
 - Maintaining a strong fiscal management system
 - Agreeing to be monitored by HUD & Lehigh County at any time
 - Submitting timely quarterly and annual reports
 - Complying with contract terms;
- Commitments can be canceled or contracts terminated due to non-compliance.

Grant Requirements

- NEPA Environmental Review:
 - Lehigh County will conduct an Environmental Review and Historic Review of all projects for Subrecipients.
 - NO WORK can start until you have been notified in writing that the Environmental Review is complete
 - After your application has been submitted, DO NOT:
 - Acquire, rehabilitate, convert, repair, begin or continue any construction
 - Solicit bids for the project (but you can get estimates)
 - Enter into a purchase and sale agreement
 - Finalize a closing of sale

Grant Requirements

- Davis Bacon Act:
 - Construction projects >\$2,000 funded in whole or in part with federal funds
 - All laborers and mechanics employed by contractors or subcontractors are to be paid federal prevailing wages
 - May increase cost of project
 - Requires weekly payment of wages
 - Each contractor must:
 - Submit weekly certified payrolls reflecting all hours worked

Grant Requirements

- Lehigh County Grant Ordinance
 - Financial documentation must be submitted at the time of application.
 - Documentation will be placed on Lehigh County's website and removed after processing of the CDBG award ordinance.

1. The current and previous fiscal year's budget, including the actual revenues and expenditures for the previous year

2. Audited financial statements for the two (2) previous fiscal years

3. The positions of all employees, officers and board members who receive \$50,000.00 or more in annual compensation, including bonuses, from the requesting organization

4. The total compensation of the organization's five (5) highest compensated individuals

5. A list of all funding sources and the total amount received from each funding source for the previous Year

6. A list of all funding sources for the current year, and a list of all pending applications for funding, including the amount requested

Grant Requirements

- Procurement:
 - Procurement must comply with local, state, & federal requirements.
 - Non-profits shall follow their agency's formal procurement guidelines. Lehigh County Administrative Code shall be adhered to if an agency doesn't have formal procurement guidelines.
 - Typically a minimum of three written quotes or estimates is required. Sealed bids required on larger projects.

- MBE/WBE:

- Requires reasonable efforts to be made to solicit bids from and procure goods and services from minority and woman-owned business enterprises for construction contracts in excess of \$25,000.
- Will require documentation that you actively solicited bids from a minimum number of MBE/WBE firms.

Grant Requirements

- **Section 3 of the HUD Act of 1968** – A requirement to ensure that economic opportunities generated by certain HUD assistance is directed to low- and very-low income persons.
 - Applicable to housing rehabilitation, housing construction, and other public construction or demolition projects that are funded with \$200,000 or more of CDBG and/or HOME funding.
 - Requirements apply to the entire project regardless of whether the project is fully or partially funded with HUD funding.
 - Subrecipients must include the [Section 3 clause](#) in their contracts, ensure that the lowest bidder authorizes the affirmative action plan, and also ensure that the contractor meets labor hour benchmarks or demonstrates qualitative efforts attempting to meet the benchmarks.

Grant Requirements

Build America, Buy America Act (BABA) – A requirement to ensure that all iron, steel, manufactured products, and construction materials used in covered infrastructure projects are produced in the United States.

- Covered infrastructure
 - Buildings and real property (includes housing)
 - Utilities
 - Drinking and wastewater systems
 - Electrical transmission facilities and systems
 - Broadband infrastructure
 - Transportation infrastructure
- Construction materials
 - All raw materials used in construction (metals, plastic materials, glass, lumber and drywall)
 - Does NOT include cement and aggregates
- De minimis waiver
 - Waiver for projects where total federal financial assistance is below \$250,000.

Grant Requirements

- Public Service Projects:
 - Failure to submit quarterly or annual reports on a timely basis may result in forfeiture of CDBG award or agency ineligibility for future CDBG funding.
 - Failure to complete the project within 60 days past the close of the program year will result in relinquishment of unused funding.

Grant Requirements

- Payments are made on a reimbursement basis
- Request for Payment requires:
 - Letter Requesting Funds on Signed Letterhead or signed Agency Invoice
 - Based on expenditures outlined in budget; budget is memorialized by contract
 - For salaries – employee timesheets reflecting actual time worked on CDBG-funded project
 - For supplies, equipment, construction services – receipts / copies of invoices and canceled checks to prove payment of those invoices.
- Costs billed to the grant must be reasonable and proportional; need “cost allocation plan” if billing rent or operating expenses, or 15% of modified total direct costs.

Grant Requirements

- Expect to retain files for 5+ years after grant close-out.
- Program files should contain:
 - Original executed copy of the agreement with Lehigh County
 - Any amendments to the application and agreement
 - Correspondence relating to the grant award
 - Copies of requests for reimbursement and all supporting documentation
 - Any other information pertinent to the Grant (Intake Forms, Client Income Verifications, income documentation, etc.)
 - Documentation of procurement (if applicable)

Grant Requirements

- Monitoring is not a “one-time” event, it’s ongoing throughout the entire lifespan of the funds
- Review occurs onsite and remotely
- Risk-based approach may be utilized when needed to determine which agencies should be prioritized for monitoring
- Technical assistance may be requested prior to or in conjunction with monitoring effort
- Monitoring reports reviewed by HUD
- Goal is to ensure your success

THANK YOU!



Q & A and Comments



Attendees registered for PH1 Zoom

Laurie A Moyer

From: Cyndi King
Sent: Tuesday, March 25, 2025 2:12 PM
To: 'Julie Shoults'; 'Vito Gallo'; 'Jason M. Peters'; 'Candace Young'; Melanie Faure; LEE RACKUS; Briana McGonagle; 'Casey Zelena'; 'Laurie Newman-Mankos, M.Ed'; Kevin Easterling; 'shari@ptd.net'; Roy Hambrecht
Cc: Laurie A Moyer
Subject: Slides for Today's ZOOM Meeting
Attachments: PH 1, Application-Workshop-Presentation-32025.pdf

Cyndi King
Executive Assistant, Community & Economic Development
County of Lehigh
17 South 7th Street
Allentown, PA 18101
610-782-3565



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2025 CDBG and HOME

Public Hearing #1

March 27, 2025, 10 am, Room 524, Government Center

Name

Contact Information

Norberto Dominguez

contactnorberto@gmail.com
484-538-6256

Laurie Moyre

Lehigh County

DRAFT



**SECOND
PUBLIC HEARING**

NOTICE OF PUBLIC HEARING LEHIGH COUNTY, PENNSYLVANIA FY 2025 ANNUAL ACTION PLAN

Notice is hereby given that Lehigh County, Pennsylvania will hold a public hearing on **Tuesday, July 15, 2025, at 12:00 p.m.**, prevailing time, in Room 524 of the Government Center, 17 South Seventh Street, Allentown, PA.

The Government Center and the Public Hearing Room are accessible to persons with physical disabilities. If special arrangements are needed to accommodate residents in order for them to participate in the public hearing, please call Ms. Laurie A. Moyer, Grants & Housing Manager, at (610) 871-1964 or by email at LCCOMMDEV@LEHIGHCOUNTY.ORG to make arrangements. Persons with hearing and/or speech impediments may contact Lehigh County through the "Pennsylvania Relay Service" by dialing "7-1-1" or going online to www.parelay.net. If requested, a foreign language and/or sign language interpreter will be provided if the County is notified three (3) days in advance of the meeting.

The purpose of this public hearing is to present the FY 2025 Lehigh County Annual Action Plan which shows the proposed use of the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funds. Lehigh County has been notified by the U.S. Department of Housing and Urban Development (HUD) that it is eligible to receive a Federal CDBG allocation of \$1,274,277 and HOME allocation of \$524,168.61. The FY 2025 Annual Action Plan must be submitted to HUD on or before August 15, 2025, to receive FY 2025 Federal funds.

In order to obtain the views of residents, public agencies and other interested parties, Lehigh County has placed the FY 2025 Annual Action Plan on display from July 1, 2025 through July 31, 2025 at the following locations in Lehigh County, as well as the Lehigh County website - <http://www.lehighcounty.org/Departments/Community-Economic-Development>:

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

These documents will be available to the public during normal hours of operation for a period of thirty (30) days until July 31, 2025, after which time the FY 2025 Annual Action Plan will be submitted to HUD on or before August 15, 2025, for HUD approval.

The proposed FY 2025 Annual Action Plan was prepared in accordance with the County's Five-Year Consolidated Plan for FY 2024-2028 and after conducting public hearings on the housing and community development needs in Lehigh County.

The County's FY 2025 CDBG Program Year begins October 1, 2025, and ends September 30, 2026.

The County proposes to use the FY 2025 HUD funds it receives as described below, subject to public comments received and the approval by the Lehigh County Board of Commissioners:

Summary of FY 2025 Annual Action Plan

FY 2025 CDBG Allocation	\$ 11,274,277.00
FY 2025 HOME Allocation	\$ 524,168.61
Total:	\$ 1,798,455.61

FY 2025 CDBG Program Budget:

Lehigh County proposes to undertake the following activities with the FY 2025 CDBG funds:

1. Black Heritage Association of the Lehigh Valley - Section 3 Training - \$20,000.00
2. North Penn Legal Services - Fair Housing Outreach - \$4,000.00
3. CDBG Administration - \$230,855.00
4. Aspire - Mental Health Therapy - \$15,000.00
5. Big Brothers Big Sisters - Bigs Mentoring Program - \$20,000.00
6. Communities in Schools - LCTI Support - \$20,000.00
7. LVCIL - PLACE - \$18,913.00
8. Manito - Therapeutic Riding - \$20,000.00
9. North Penn Legal Services - Legal Help Project - \$15,000.00
10. Parkland CARES - Food Pantry - \$12,000.00
11. CALV - Second Harvest Food Bank - \$32,000.00
12. CACLV - Roof and HVAC Replacement - \$176,000.00
13. Catasauqua Borough - Street Reconstruction - \$70,000.00
14. Coplay Borough - Fire Equipment Replacement - \$45,379.53
15. Emmaus Borough - Curb Cuts - \$100,000.00
16. Fountain Hill Borough - Street Reconstruction - \$199,900.00
17. Slatington Borough - Street Reconstruction - \$79,000.00
18. Slatington Borough - Road Reconstruction - \$196,229.47

Total CDBG: \$1,274,227.00

FY 2025 HOME Program Budget:

Lehigh County proposes to undertake the following activities with the FY 2025 HOME funds:

1. HOME Administration - \$44,553.61
2. CHDO Set-Aside - \$78,626.00
3. Soteria / Cortex - Urban Place Apartments - \$200,989
4. Calvary Temple - Willows at Calvary - \$200,000.00

Total HOME: \$524,168.61

All interested residents are encouraged to attend this public hearing and they will be given the opportunity to present oral or written testimony concerning the proposed use of CDBG funds under the FY 2025 Annual Action Plan. Written comments may be addressed to Ms. Laurie A. Moyer, Grants Management Specialist, Government Center, 17 South Seventh Street, Allentown, PA 18101, or by email at LCCOMMDEV@LEHIGHCOUNTY.ORG or oral comments may be made by calling (610) 871-1964.

Laurie A Moyer
Grants Management Specialist
Lehigh County

Publish on: June 30, 2025

Proof of Publication Requested



RESALE RECAPTURE

RESALE/RECAPTURE POLICY FOR LEHIGH COUNTY, PA HOME INVESTMENT PARTNERSHIP PROGRAM (HOME)

Lehigh County has prepared the following policy which addresses the issues of sale or transfer of ownership of property financed with HOME assisted funding. This policy is in accordance with the HUD Regulations found in 24 CFR Part 92.254. The issue of recapture arises when a homeowner that received homebuyer assistance under the HOME Program decides to sell the property. If the property is sold after the period of affordability has expired, there are no restrictions in terms of recapture of HOME funds that apply to such a transaction. However, if the sale occurs before the period of affordability has expired, certain regulatory limitations apply.

The regulations at 24 CFR 92.254(a)(5) give the participating jurisdiction two (2) broad options relative to the treatment of properties that are sold before the period of affordability has expired:

- The owner that received HOME assistance must sell the home to a low-income household that will use the property as their principal residence; or
- The participating jurisdiction must recapture some or all of the HOME investment that was initially extended to the homeowner.

A low-income household is defined as a household whose gross annual income does not exceed 80% of the median household income.

A home is considered to be affordable if a household earns 80% or less of the median income and they do not pay more than 30% of their income for housing and related housing costs.

It is the policy of the County, wherever possible to recapture the appropriate amount of the HOME investment rather than restricting the sale to a qualified low-income household that will use the property as its principal residence. The guidelines for recapture for the homebuyer program that the Lehigh County has established, are as follows:

1. Sale of Property Before the End of the Period of Affordability - Lehigh County guidelines for recapture are:

- The County will place a lien on the property in its favor for the full amount of the HOME investment.
- Upon sale or transfer of ownership of the home by the HOME assisted household before the period of affordability expires, the County will make every effort to recapture its pro rata share of the HOME investment from the net proceeds of the sale.
- The County will give the homeowner credit for the amount of the homeowner's down payment, closing costs, principal payments made, and

any capital improvement investments, which will reduced from the net proceeds.

- After totaling the amounts above, if the net proceeds are not sufficient to recapture the full amount of the HOME investment, the HOME investment amount may be reduced and prorated based on the time the homeowner has owned and occupied the unit, measured against the required period of affordability.
- If the net proceeds are not sufficient to recapture the full HOME investment, the homeowner may not recover more than the amount of the homeowner's down payment, principal payments, and any capital improvements invested in the property.
- The County will use HOME funds that are recaptured to assist other income eligible homebuyers.

In the event the mortgaged property is sold or otherwise transferred prior to the expiration period of affordability, as established by the amount of HOME assistance received from the date of the initial sale, then the pro rata share of the net proceeds from the sale or transfer shall be paid to Lehigh County.

Lehigh County may reduce the amount of the direct HOME subsidy on a pro rata basis for the time the homebuyer has owned and occupied the house, measured against the required affordability period. The resulting ratio would be used to determine how much of the direct HOME subsidy the County would recapture. The pro rata amount recaptured by the County cannot exceed what is available from net proceeds.

The following formula will be used to determine the amount of the HOME Subsidy the County will recapture. The pro rata amount recaptured by the County cannot exceed what is available from the net proceeds.

$$\frac{\text{Number of Years Homebuyer Occupied the Home}}{\text{Number of Years Period of Affordability}} \times \text{Total Direct HOME Subsidy} = \text{Recapture Amount}$$

The total amount payable by the borrower under the following paragraphs shall never exceed the face amount of the HOME subsidy.

To the extent that the net proceeds are less than the outstanding principal balance of the lien, the remainder shall be forgiven.

If the net proceeds are not sufficient to recapture the full HOME investment [or a reduced amount as provided for in 24 CFR Sub-Part 92.254 (a)(5)(ii)(A)(2)] and also enable the homeowner to recover the amount of his/her down payment, closing costs, and any capital improvement investments made by the homeowner since the purchase, the County may share the net proceeds. The net proceeds are

the sales price minus loan repayments (other than HOME funds) and closing costs. The net proceeds may be divided proportionally as set forth in the following mathematical formulas:

$$\frac{\text{Direct HOME Subsidy Amount}}{\text{HOME Subsidy} + \text{Homeowner Investment}} \times \text{Net Proceeds} = \text{HOME Recapture Amount}$$

$$\frac{\text{Homeowner's Amount of Investment}}{\text{HOME Subsidy} + \text{Homeowner Investment}} \times \text{Net Proceeds} = \text{Amount to Homeowner}$$

Lehigh County will be responsible for ensuring that the homeowner maintains the house, assisted with HOME funds, as their principal residence for the duration of the period of affordability. If the house is sold or ownership is transferred, during the period of affordability, the County must be notified of the sale, or transfer, and the recapture provisions will be in effect. The County will enter into a written agreement with the homeowner, as well as a mortgage and lien document will be recorded that outlines the recapture provisions.