

**Labor Force**

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

**Table 41 - Labor Force**

Data Source: 2011-2015 ACS

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

**Table 42 – Occupations by Sector**

Data Source: 2011-2015 ACS

**Travel Time**

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

**Table 43 - Travel Time**

Data Source: 2011-2015 ACS

**Education:**

Educational Attainment by Employment Status (Population 16 and Older)

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

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

**Table 44 - Educational Attainment by Employment Status**

Data Source: 2011-2015 ACS

Educational Attainment by Age

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

**Table 45 - Educational Attainment by Age**

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

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

**Table 46 – Median Earnings in the Past 12 Months**

Data Source: 2011-2015 ACS

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

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

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**Describe the workforce and infrastructure needs of the business community:**

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

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

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

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

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

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

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

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

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

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

No.

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

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

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

**Discussion**

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

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## **MA-50 Needs and Market Analysis Discussion**

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

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

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

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

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

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

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

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

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

**Are there any community assets in these areas/neighborhoods?**

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

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

**Are there other strategic opportunities in any of these areas?**

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

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

## Strategic Plan

### SP-05 Overview

#### Strategic Plan Overview

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

#### HOUSING STRATEGY - HSS

##### Goal:

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

##### Objectives:

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

#### HOMELESS STRATEGY - HOM

##### Goal:

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

**Objectives:**

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

**SPECIAL NEEDS STRATEGY - SNS**

**Goal:**

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

**Objectives:**

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

**COMMUNITY DEVELOPMENT STRATEGY - CDS**

**Goal:**

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

**Objectives:**

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

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

### **ECONOMIC DEVELOPMENT STRATEGY - EDS**

#### **Goal:**

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

#### **Objectives:**

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

### **ADMINISTRATION, PLANNING, AND MANAGEMENT STRATEGY - APM**

#### **Goal:**

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

#### **Objectives:**

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

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

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

**Geographic Area**

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

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

**Table 47 - Geographic Priority Areas**

**General Allocation Priorities**

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

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

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

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

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

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

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

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

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

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## SP-25 Priority Needs - 91.215(a)(2)

### Priority Needs

Table 4 – Priority Needs Summary

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

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

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

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

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

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

**Narrative (Optional)**

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

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

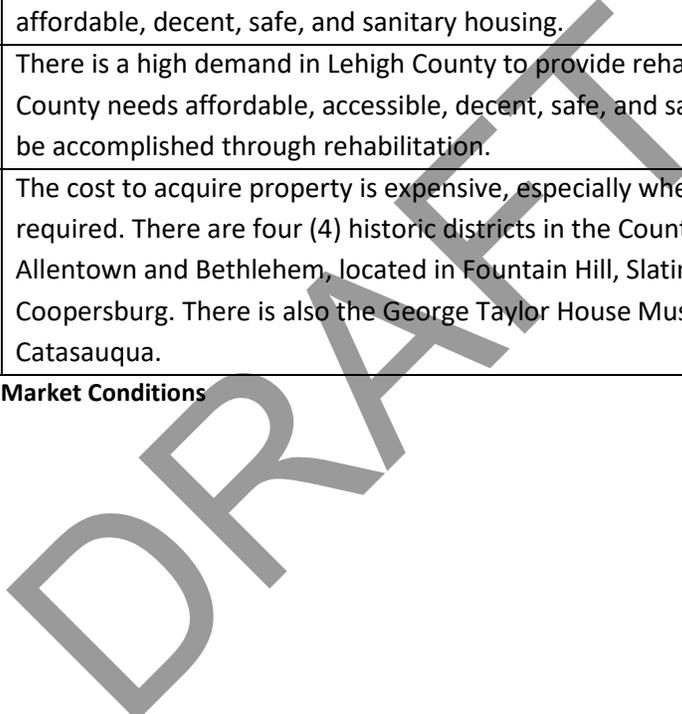
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**SP-30 Influence of Market Conditions – 91.215 (b)**

**Influence of Market Conditions**

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

**Table 48 – Influence of Market Conditions**



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

### **Introduction**

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

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

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

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**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$1,216,119.00	\$0.00	\$0.00	\$1,216,119.00	\$4,286,067.00	Five Years of funding at a reduction level each year of 5%.  16 projects/activities were funded based on FY 2019 CDBG allocations.
HOME	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$569,699.00	\$0.00	\$0.00	\$569,699.00	\$569,699.00	3 projects/activities were funded based on FY 2022 CDBG allocations.

**Table 49 - Expected Resources – Priority Table**

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

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

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

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

- **Lehigh County Affordable Housing Trust Funds (AHTF)** - The Pennsylvania Optional County Affordable Housing Trust Funds Act of 1992 (Act 137), allows counties to raise revenues for affordable housing efforts by increasing the fees charged by the Recorder of Deeds Office for recording deeds and mortgages. The County raised the fee from \$13 to \$26 per document. Affordable Housing Trust Funds revenue is used to fund affordable housing initiatives and up to 15 percent may be used for the administrative costs to implement the initiatives. Eligible activities include using the revenues as the local matching funds to secure Federal and State Funds, construction or rehabilitation financing, housing-related services, match for other State or Federal funds, and supporting first-time homebuyer second mortgage programs. Lehigh County has recommended allocating \$574,736 for FY 2109 from the Affordable Housing Trust Fund to allow the funds to grow and be used for future projects.
- **HOME Investment Partnership** - Lehigh County will be receiving HOME funds from the Commonwealth of Pennsylvania's Department of Community and Economic Development. The County will receive \$500,000 in HOME funds in FY 2019.
- **Continuum of Care Grant** - Lehigh County is part of the Lehigh Valley Regional Housing Advisory Board. This is a two (2) county region that applies for Continuum of Care funds each year. In FY 2018, the Lehigh Valley received multi-year funding for thirteen (13) projects totaling \$2,466,453.00 for support services and permanent supportive housing projects throughout the region. Of the thirteen (13) projects funded, twelve (12) were Tier 1 awards, and one (1) was Tier 2 awards.
- **The Lehigh County Housing Authority** - Expects to receive \$506,299.00 in FY 2019 funds from the Public Housing Capital Fund Program, as well as Public Housing Operating funds and Section 8 Housing Choice Voucher assistance.
- **Emergency Solutions Grant (ESG) Funds** - Lehigh County will apply for ESG grants from the Pennsylvania Department of Community and Economic Development during FY 2019.

- Other federal funds that may be used in support of housing, community development, and economic development during FY 2019 include loans through HUD's Section 108 Loan Program, Brownfields Economic Development Initiative (BEDI) grants, and HUD Supportive Housing Programs.

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

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

**Discussion**

Not Applicable.

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**SP-40 Institutional Delivery Structure – 91.215(k)**

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

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

**Table 50 - Institutional Delivery Structure**

**Assess of Strengths and Gaps in the Institutional Delivery System**

The following services are targeted to the homeless:

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

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

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

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

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

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

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

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

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

**Table 51 - Homeless Prevention Services Summary**

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

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

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

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

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

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

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

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

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

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

**Goals Summary Information**

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

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

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

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

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

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

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

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

Table 49 – Goals Summary

**Goal Descriptions**

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

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

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

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

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

Lehigh County proposes to assist the following:

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

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

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

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

**Activities to Increase Resident Involvements**

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

Family Self-Sufficiency (FSS) programs are provided to Section 8 Housing Choice Voucher Holders and public housing tenants. FSS program residents work with a case manager to develop goals that will, over a five (5) year period, lead to self-sufficiency. These goals may include education, specialized training, job readiness, job placement activities, and career advancement objectives. The goals for each participating family member are set out in Individual's Training and Service Plan. LCHA has a baseline of 1,652 Section 8 Housing Choice Vouchers, with 1,100 applications on the waiting list. The Lehigh County Housing Authority has selected residents to access and review its Annual Action Plan when available.

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

The Lehigh County Housing Authority is not designated as troubled.

**Plan to remove the 'troubled' designation**

Not Applicable.

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

### Barriers to Affordable Housing

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

### Strategy to Remove or Ameliorate the Barriers to Affordable Housing

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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## **SP-60 Homelessness Strategy – 91.215(d)**

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

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

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

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

### **Addressing the emergency and transitional housing needs of homeless persons**

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

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

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

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

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

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

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

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

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

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

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

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

**A. Evaluate and Improve Discharge Planning where Needed**

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

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

#### **B. Increase Coordination of Homeless Prevention Sources**

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

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

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

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

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

The Lehigh County Department of Human Services provides a wide range of programs for its elderly, substance abusers, people with mental health and intellectual disabilities, children and youth, and veterans. The County also provides funding for Meals on Wheels of the Greater Lehigh Valley to deliver meals to homebound seniors and adults with disabilities.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

In Lehigh County, the Community Action Committee of the Lehigh Valley (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, transportation to work for up to six (6) months and assistance in purchasing a dependable vehicle, and other various programs that empower low-income households by assisting them to develop the skills needed for independent living.

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

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

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

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

- Lehigh County works in conjunction with Lehigh Valley Economic Development Corporation (LVEDC), community organizations, other economic development groups and the Workforce

Investment Board to help enhance programs and create opportunities in the County.

- Lehigh County Economic Development Corporation (LVEDC) is able to provide manufacturing, industrial, and nonprofit organizations with low-interest financing generated through tax exempt revenue bonds.
- Pennsylvania CareerLink® Lehigh Valley offers job search counseling, skills assessment programs, GED courses, information on training programs and workshops on many subjects, including resume writing and interview skills. Considered a one-stop location for all employment needs, CareerLink® offers a multi-faceted approach to the job market.

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

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

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## **SP-80 Monitoring – 91.230**

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

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

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

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

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

Activities of sub-recipient non-profit agencies will be closely monitored and will include review and approval of budgets, compliance with executed grant agreements, review and approval of vouchers, review of fiscal reports on a quarterly basis, and a review of audits on an annual basis. Monitoring will also occur through on-site monitoring visits. These visits will occur as necessary, but will be conducted at least once a year.

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

There are monitoring responsibilities that go beyond the time of completion of various activities. The overall performance of the program relative to the Five-Year Strategic Plan goals is monitored at least bi-annually through the selection of the annual activities and again during the preparation of the

Comprehensive Annual Performance and Evaluation Report (CAPER). If it appears that proposed goals are not being addressed, the County will re-evaluate the goals, project performance and determine the course of action needed to bring the program into compliance.

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## Expected Resources

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

#### Introduction

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

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

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

#### CARES Act Substantial Amendments:

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

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

**Substantial Amendment # 4:**

The following financial resources are identified for the FY 2019-2023 Five Year Consolidated – Substantial Amendment to address the priority needs and goals/strategies identified in Lehigh County's Five Year Consolidated Plan using the HOME funds.

Lehigh County has been notified by the U.S. Department of Housing and Urban Development (HUD) that it is eligible to receive HOME Investment Partnership (HOME) funds as a Federal entitlement community. To accept these funds the County needs to amend its FY 2019-2023 Five Year Consolidated Plan to add the HOME funds into this document.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$1,216,119.00	\$0.00	\$0.00	\$1,216,119.00	\$4,286,067.00	Five Years of funding at a reduction level each year of 5%.  16 projects/activities were funded based on FY 2019 CDBG allocations.

HOME	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$569,699.00	\$0.00	\$0.00	\$569,699.00	\$569,699.00	3 projects/activities were funded based on FY 2022 CDBG allocations.
Other: CDBG-CV	public - federal	Admin and Planning Public Services Other	\$2,025,770.00	\$0.00	\$0.00	\$2,025,770.00	\$0.00	CDBG-CV funds to be used to prevent, prepare for, and respond to the coronavirus.

Table 52 - Expected Resources – Priority Table

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

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

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

- **Lehigh County Affordable Housing Trust Funds (AHTF)** - The Pennsylvania Optional County Affordable Housing Trust Funds Act of 1992 (Act 137), allows counties to raise revenues for affordable housing efforts by increasing the fees charged by the Recorder of Deeds Office

for recording deeds and mortgages. The County raised the fee from \$13 to \$26 per document. Affordable Housing Trust Funds revenue is used to fund affordable housing initiatives and up to 15 percent may be used for the administrative costs to implement the initiatives. Eligible activities include using the revenues as the local matching funds to secure Federal and State Funds, construction or rehabilitation financing, housing related services, match for other State or Federal funds, and supporting first-time homebuyer second mortgage programs. Lehigh County has recommended allocating \$574,736 for FY 2019 from the Affordable Housing Trust Fund to allow the funds to grow and be used for future projects.

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

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

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

**Discussion**

Not applicable.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

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

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

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

Table 53 – Goals Summary

**Goal Descriptions**

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

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

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## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

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

#### Projects

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

17.	CV - Catholic Charities - Rent Conciliation Program	\$118,500.00
18.	CV - CACLV - CAFS - Foreclosure Assistance	\$15,000.00
19.	CV - CACLV - Sixth Street Shelter	\$50,000.00
20.	CV - Conference of Churches - Rental Assistance Program	\$105,480.00
21.	CV - LCTI - COVID Scholarships	\$60,000.00
22.	CV - Literacy Center - Workforce Development Online Education	\$30,000.00
23.	CV - NPLS - Legal Aide	\$20,000.00
24.	CV - Administration	\$100,770.00
25.	CV - Technology Adaptations	\$150,000.00
26.	CV - Food Security	\$800,000.00
28.	CV - Housing Stabilization	\$800,000.00
29.	CV-COVID Support Program	\$175,000.00

Table 54 – Project Information

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

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

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

- Economic development projects will either be located in a low- and moderate-income census tract/block group, or a poverty tract greater than 20%, or part of a redevelopment plan, or making 51% of the jobs available to low- and moderate-income population.

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

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

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

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

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

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## AP-38 Project Summary

### Project Summary Information

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

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

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

<b>6.</b>	<b>Project Name</b>	<b>Lehigh Carbon Community College Foundation – ESL for Communication Success</b>
	<b>Target Area</b>	County wide
	<b>Goals Supported</b>	CDS-3 Public Services
	<b>Needs Addressed</b>	Community Development Strategy – CDS
	<b>Funding</b>	CDBG: \$6,000.00
	<b>Description</b>	Lehigh Carbon Community College will offer an English as a Second Language class at Whitehall High School for low-income residents of Whitehall and Coplay.
	<b>Target Date</b>	9/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	30 low-moderate income persons
	<b>Location Description</b>	Residents of Whitehall Township and Coplay Borough; Whitehall High School, 3800 Mechanicsville Road, Whitehall, PA 18052
	<b>Planned Activities</b>	The Regulatory Citation is Public Services, 570.201(e) The Project Matrix Code is 05Z, Other Public Services Not Listed in 03T and 05A-05Y The National Objective is Low/Mod Income Limited Clientele (LMC), 570.208(a)(2)(i)(B)
<b>7.</b>	<b>Project Name</b>	<b>Lehigh Career &amp; Technical Institute – Scholarships for Low-Income Residents</b>
	<b>Target Area</b>	County wide
	<b>Goals Supported</b>	CDS-3 Public Services
	<b>Needs Addressed</b>	Community Development Strategy – CDS
	<b>Funding</b>	CDBG: \$19,500.00
	<b>Description</b>	Lehigh Career & Technical Institute (LCTI) proposes to provide four (4) scholarships for LMI individuals to attain a CDL-A and/or HEO certification.
	<b>Target Date</b>	9/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Four (4) persons.
	<b>Location Description</b>	County-wide, excluding the cities of Allentown and Bethlehem; 4500 Education Park Drive, Schnecksville, PA 18079.

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

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

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

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

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

	<b>Target Area</b>	County Wide
	<b>Goals Supported</b>	HOM-3 Homeless Prevention
	<b>Needs Addressed</b>	Housing Priority
	<b>Funding</b>	CDBG-CV: \$118,500
	<b>Description</b>	A program to stay eviction proceedings for renters who are on the verge of being evicted due to lack of income from COVID-19.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The goal is to assist 30 households on the verge of becoming homeless.
	<b>Location Description</b>	Project will assist households living throughout Lehigh County, outside the cities of Allentown and Bethlehem.
	<b>Planned Activities</b>	Case management of households receiving financial assistance. Financial assistance includes monthly rent not to exceed 3 months.
18.	<b>Project Name</b>	<b>CV - CACLV - CAFS - Foreclosure Assistance</b>
	<b>Target Area</b>	County Wide
	<b>Goals Supported</b>	HOM-3 Homeless Prevention
	<b>Needs Addressed</b>	Homeless Priority
	<b>Funding</b>	CDBG-CV: \$15,000
	<b>Description</b>	Foreclosure mitigation counseling for households impacted by COVID-19.
	<b>Target Date</b>	9/1/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	At least 37 households outside of the cities of Allentown and Bethlehem will be counseled to avoid foreclosure as a result of the impact of the pandemic.
	<b>Location Description</b>	County-wide but outside of the cities of Allentown and Bethlehem.
<b>Planned Activities</b>	Foreclosure mitigation counseling which diverts households from direct foreclosure through conciliation in civil court with the attempt to waive the foreclosure and retain ownership.	
19.	<b>Project Name</b>	<b>CV - CACLV - Sixth Street Shelter</b>

	<b>Target Area</b>	County Wide
	<b>Goals Supported</b>	HOM-1 Housing
	<b>Needs Addressed</b>	Homeless Priority
	<b>Funding</b>	CDBG-CV: \$50,000
	<b>Description</b>	Assistance to families impacted by COVID-19 which are leaving the shelter with up to 3 months of rental assistance for apartments located in eligible areas of Lehigh County.
	<b>Target Date</b>	9/1/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	At least 10 low-income households will benefit from the activity.
	<b>Location Description</b>	Households moving into apartments located outside the cities of Allentown and Bethlehem.
	<b>Planned Activities</b>	Up to 3 months of rental assistance as well as case management to assist in housing and financial stability.
20.	<b>Project Name</b>	<b>CV - Conference of Churches - Rental Assistance Program</b>
	<b>Target Area</b>	County Wide
	<b>Goals Supported</b>	HOM-3 Homeless Prevention
	<b>Needs Addressed</b>	Homeless Priority
	<b>Funding</b>	CDBG-CV: \$105,480
	<b>Description</b>	Short-term rental assistance to avoid eviction for households living in eligible areas of Lehigh County.
	<b>Target Date</b>	9/1/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 30 homeless households, and also those on the verge of homelessness, will be assisted under this program.
	<b>Location Description</b>	Households living within Lehigh County but outside the cities of Allentown and Bethlehem will be able to be assisted.
	<b>Planned Activities</b>	The CDBG costs include rental assistance up to 3 months. The Grantee will cover housing case management for CDBG-assisted households.
21.	<b>Project Name</b>	<b>CV - LCTI - COVID Scholarships</b>

	<b>Target Area</b>	County Wide
	<b>Goals Supported</b>	EDS-1 Employment
	<b>Needs Addressed</b>	Economic Development Priority
	<b>Funding</b>	CDBG-CV: \$60,000
	<b>Description</b>	Scholarships for households impacted by job loss due to COVID-19. Short-term training options in high demand fields leading to industry certifications and immediate job placements at sustainable wages.
	<b>Target Date</b>	9/1/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 30 households experiencing COVID-19 job loss will be impacted by the scholarship program.
	<b>Location Description</b>	Households eligible for scholarships will live within Lehigh County but outside the cities of Allentown and Bethlehem.
	<b>Planned Activities</b>	The provision of scholarships to retrain in one of Lehigh County Technical Institute's manufacturing, transportation, or construction program options, leading to industry certifications and immediate job placement at sustainable wages.
22.	<b>Project Name</b>	<b>CV - Literacy Center - Workforce Development Online Education</b>
	<b>Target Area</b>	County Wide
	<b>Goals Supported</b>	EDS-1 Employment
	<b>Needs Addressed</b>	Economic Development Priority
	<b>Funding</b>	CDBG-CV: \$30,000
	<b>Description</b>	Online classes to combat unemployment caused by COVID.
	<b>Target Date</b>	9/1/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 60 households impacted by COVID-19 will benefit from online literacy instruction.
	<b>Location Description</b>	Eligible households living within Lehigh County but outside the cities of Allentown and Bethlehem.
	<b>Planned Activities</b>	Online literacy and workplace skills training for households impacted by COVID-19.

<b>23.</b>	<b>Project Name</b>	<b>CV - NPLS - Legal Aide</b>
	<b>Target Area</b>	County Wide
	<b>Goals Supported</b>	HOM-3 Homeless Prevention
	<b>Needs Addressed</b>	Homeless Priority
	<b>Funding</b>	CDBG-CV: \$20,000
	<b>Description</b>	Advice and referrals to low-income people impacted by COVID-19 who are being evicted, foreclosed upon, denied housing, struggling with health problems, or living in housing with habitability issues.
	<b>Target Date</b>	9/1/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 100 households will benefit from the virtual housing clinics; however, 20 low-income households will receive advice, referrals, advocacy, and/or direct representation.
	<b>Location Description</b>	Eligible households will live within Lehigh County but outside the cities of Allentown and Bethlehem.
<b>Planned Activities</b>	COVID-19 virtual housing clinics, update resources regarding COVID-19 housing rights, as well as advice, referrals, advocacy, and some direct representation to people being evicted, denied housing, or forced to live in uninhabitable conditions due to COVID-19 related circumstances.	
<b>24.</b>	<b>Project Name</b>	<b>CV - Administration</b>
	<b>Target Area</b>	County Wide
	<b>Goals Supported</b>	APM-1 Coordination
	<b>Needs Addressed</b>	Administration, Planning, and Management Priority
	<b>Funding</b>	CDBG-CV: \$100,770
	<b>Description</b>	Program administration related to CDBG-CV projects.
	<b>Target Date</b>	9/1/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	46,195 low- and moderate-income persons and 1 organization.
	<b>Location Description</b>	County-Wide; 17 South Seventh Street, Allentown, PA 18101

	<b>Planned Activities</b>	
25.	<b>Project Name</b>	<b>CV - Technology Adaptations</b>
	<b>Target Area</b>	County Wide
	<b>Goals Supported</b>	CDS-3 Public Services
	<b>Needs Addressed</b>	Community Development Priority
	<b>Funding</b>	CDBG-CV: \$150,000
	<b>Description</b>	Funding for the purchase and implementation of technology to address alternative service delivery needs due to COVID-19.
	<b>Target Date</b>	9/1/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 100 low-income families will benefit from the proposed activities.
	<b>Location Description</b>	
	<b>Planned Activities</b>	
26.	<b>Project Name</b>	<b>CV - Food Security</b>
	<b>Target Area</b>	County Wide
	<b>Goals Supported</b>	CDS-3 Public Services
	<b>Needs Addressed</b>	Community Development Priority
	<b>Funding</b>	CDBG-CV: \$800,000
	<b>Description</b>	Funding towards the purchase, storage, and distribution of food to banks and pantries.
	<b>Target Date</b>	9/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 600 unduplicated, low-income households will benefit from the proposed activities.
	<b>Location Description</b>	County-wide, except for Allentown and Bethlehem
	<b>Planned Activities</b>	Purchase and distribution of food and sanitary care items, as well as supplies necessary to manage programs.
27.	<b>Project Name</b>	<b>CV - Housing Stabilization</b>
	<b>Target Area</b>	County Wide

	<b>Goals Supported</b>	County Wide
	<b>Needs Addressed</b>	CDS-3 Public Services
	<b>Funding</b>	CDBG-CV: \$800,000
	<b>Description</b>	Subsistence payments, income generation, as well as COVID health information services to help stabilize households in crisis and/or at risk for homelessness due to COVID.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 100 low-income families will benefit from the proposed activities.
	<b>Location Description</b>	County-wide, excluding Allentown and Bethlehem.
	<b>Planned Activities</b>	Funding for security deposits, six months of rental, mortgage, and utility payments, mortgage arrears, case management, emergency expenses, counseling for job and education opportunities, COVID-related health information, and housing search.
<b>28.</b>	<b>Project Name</b>	<b>CV - COVID Support Program</b>
	<b>Target Area</b>	County Wide
	<b>Goals Supported</b>	CDS-3 Public Services
	<b>Needs Addressed</b>	Community Development Priority
	<b>Funding</b>	CDBG-CV: \$175,000
	<b>Description</b>	Funding for projects offering health and service related information and support to households impacted by COVID-19.
	<b>Target Date</b>	9/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 56 low-income persons will benefit from the proposed activities.
	<b>Location Description</b>	County-wide, excluding Allentown and Bethlehem.
	<b>Planned Activities</b>	

**AP-50 Geographic Distribution – 91.220(f)**

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

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

**Geographic Distribution**

Target Area	Percentage of Funds
County wide	100%

Table 55 - Geographic Distribution

**Rationale for the priorities for allocating investments geographically**

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

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

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

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

## Discussion

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

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

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

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

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

**Table 56 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	30
The Production of New Units	0
Rehab of Existing Units	3
Acquisition of Existing Units	0
<b>Total</b>	<b>33</b>

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

### Discussion

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

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

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

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

Each year, the Lehigh County Housing Authority (LCHA) receives an allocation of funds from HUD under the Capital Fund Program to undertake physical improvements. In addition, the LCHA receives operating subsidies to offset the operating deficits associated with public housing units and to carry out maintenance. The Lehigh County Housing Authority anticipates that it will receive \$506,299.00 under a HUD Capital Fund grant for FY 2019 that it will use to replace windows at Clarence Aungst Towers, replace kitchens at the Cherokee and Delaware Apartments, and replace sheeting, siding, insulation, and windows at 17<sup>th</sup> Street Village.

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

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

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

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

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

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

a five (5) year period, lead to self-sufficiency. These goals may include education, specialized training, job readiness, job placement activities, and career advancement objectives. The goals for each participating family member are set out in Individual's Training and Service Plan. LCHA has a baseline of 1,652 Section 8 Housing Choice Vouchers, with 1,240 applications on the waiting list. The Lehigh County Housing Authority has selected residents to access and review the Annual Action Plan when available.

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

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

**Discussion**

Not applicable.

DRAFT

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## **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.

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

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

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

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

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

**Addressing the emergency shelter and transitional housing needs of homeless persons**

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

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

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

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

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

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

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

- Valley Youth House (Emergency Shelter)
- Valley Youth House - Maternity Group Home (Transitional Housing)
- Valley Youth House - Supportive Housing for Families (Transitional Housing)
- Valley Youth House - Supportive Housing for Youth (Transitional Housing).

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

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

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

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

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

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

### Discussion

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

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

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

### **Introduction:**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Discussion:**

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

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## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

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

### **Actions planned to address obstacles to meeting underserved needs**

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

- There are opportunities available for more collaborative initiatives between for-profit developers and non-profit organizations in the Lehigh Valley. By partnering with an experienced for-profit developer, a smaller non-profit can enhance its capacity in budgeting, planning, financing, and construction management skills.
- There are also opportunities for public housing authorities to create new affordable housing using LIHTCs or other funding sources.

The Lehigh Valley Planning Commission has developed various model zoning and land use controls to encourage affordable housing. Lehigh County will continue its work with the Lehigh Valley Planning Commission (LVPC) to develop and promote model ordinances for inclusionary zoning. Lehigh County has an Affordable Housing Trust Fund. The fund provides support for affordable housing projects in the County.

### **Actions planned to foster and maintain affordable housing**

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

#### **HOUSING STRATEGY – HSS**

##### **Goal:**

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

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

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

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

**Actions planned to reduce lead-based paint hazards**

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

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

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

### **Actions planned to reduce the number of poverty-level families**

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

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

In Lehigh County, the Community Action Committee of the Lehigh Valley (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, transportation to work for up to six (6) months and assistance in purchasing a dependable vehicle, and other various programs that empower low-income households by assisting them to develop the skills needed for independent living.

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

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

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

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

- Lehigh County works in conjunction with Lehigh Valley Economic Development Corporation (LVEDC), community organizations, other economic development groups and the Workforce

Investment Board to help enhance programs and create opportunities in the County.

- Lehigh County Economic Development Corporation (LVEDC) is able to provide manufacturing, industrial, and nonprofit organizations with low-interest financing generated through tax exempt revenue bonds.

Pennsylvania CareerLink® Lehigh Valley offers job search counseling, skills assessment programs, GED courses, information on training programs and workshops on many subjects, including resume writing and interview skills. Considered a one-stop location for all employment needs, CareerLink® offers a multi-faceted approach to the job market.

### **Actions planned to develop institutional structure**

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

In order to address the County's housing and community development needs, the County has established an extensive public-private partnership aimed at revitalization in the County. In 2019, the partnership includes the following agencies:

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

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

- The Greater Lehigh Valley Chamber of Commerce
- Community Action Committee of the Lehigh Valley
- Lehigh Valley Workforce Development Board
- Local elected officials

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

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

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

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

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

Lehigh County will continue efforts to enhance coordination between agencies by creating partnerships such as in the implementation of the Section 3 and MBE-WBE outreach initiatives. The Section 3 outreach effort will partner with the PA CareerLink®, the Lehigh County Housing Authority and LCTI to identify Section 3 residents and businesses and to provide feedback on available job opportunities. Such partnerships help to develop a better understanding of community needs. The County budgeted \$19,500.00 in FY 2019 for the Lehigh Career & Technical Institute – Scholarships for Low-Income Residents project, which will provide four (4) scholarships for low- and moderate-income individuals, including Section 3 individuals, to attain a CDL-A and/or HEO certification.

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

### **Discussion:**

Not Applicable.

## Program Specific Requirements

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

**Introduction:**

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

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

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$0.00
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	<b>\$0.00</b>
<b>Total Program Income</b>	

#### Other CDBG Requirements

1. The amount of urgent need activities	\$0.00
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**CDBG Percentage:**

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

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# RESALE/RECAPTURE POLICY

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

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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 be 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.

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# CITIZEN PARTICIPATION

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**NOTICE OF PUBLIC HEARING  
LEHIGH COUNTY, PENNSYLVANIA  
FY 2019-2023 FIVE YEAR CONSOLIDATED PLAN –  
SUBSTANTIAL AMENDMENT**

Notice is hereby given that Lehigh County, Pennsylvania will hold a public hearing on **Tuesday, July 19, 2022 at 12:30 PM**, 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 need to be made 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 contact her by email at [lauriemoyer@lehighcounty.org](mailto:lauriemoyer@lehighcounty.org) to make those 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](http://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 a Substantial Amendment to the FY 2019-2023 Five Year Consolidated Plan. Lehigh County has been notified by the U.S. Department of Housing and Urban Development (HUD) that it is eligible to receive HOME Investment Partnership (HOME) funds as a Federal entitlement community. To accept these funds the County needs to amend its FY 2019-2023 Five Year Consolidated Plan to add the HOME funds into this document. The FY 2019-2023 Five Year Consolidated Plan – Substantial Amendment is to be submitted to HUD on or before August 15, 2022.

In order to obtain the views of residents, public agencies and other interested parties, Lehigh County has placed the FY 2019-2023 Five Year Consolidated Plan – Substantial Amendment on display from July 8, 2022 through August 8, 2022 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 7<sup>th</sup> Street, Allentown, PA 18101
- **Catasauqua Public Library** - 302 Bridge Street, Catasauqua, PA 18032
- **Coplay Library** - 49 South 5<sup>th</sup> Street, Coplay, PA 18037
- **Emmaus Public Library** - 11 East Main Street, Emmaus, PA 18049
- **Lower Macungie Library** - 3400 Brookside Road, Macungie, PA 18062
- **Parkland Community Library** - 4422 Walbert Avenue, Allentown, PA 18104
- **Slatington Library** - 650 Main Street, Slatington, PA 18080
- **Southern Lehigh Public Library** - 3200 Preston Lane, Center Valley, PA 18034
- **Whitehall Township Public Library** - 3700 Mechanicsville Road, Whitehall, PA 18052

These documents will be available to the public during normal hours of operation for a period of thirty (30) days until August 8, 2022 after which time the FY 2019-2023 Five Year Consolidated Plan – Substantial Amendment will be submitted to HUD on or before August 15, 2022 for approval.

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 substantial amendment to the FY 2019-2023 Five Year Consolidated Plan. Written comments may be addressed to Ms. Laurie A. Moyer, Grants & Housing Manager, Government Center, 17 South Seventh Street, Allentown, PA 18101, or by email at [lauriemoyer@lehighcounty.org](mailto:lauriemoyer@lehighcounty.org) or oral comments may be made by calling (610) 871-1964.

Laurie A Moyer  
Grants & Housing Manager  
Lehigh County

Run in the Morning Call on Thursday, July 7, 2022, legal ad. Affidavit required.

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