

LEHIGH COUNTY, PENNSYLVANIA

DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT

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

2018 Analysis of Impediments to Fair Housing Choice **FINAL**

Community Development Block Grant (CDBG) Program

December, 2018

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Department of Community and
Economic Development



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Executive Summary

Lehigh County, Pennsylvania is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively furthering fair housing," each community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice and what steps it will take to affirmatively further fair housing. HUD advises communities that the Analysis of Impediments to Fair Housing should also address the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of Title I of the Housing and Community Development Act of 1974, Title II of the Americans with Disabilities Act of 1990, Architectural Barriers Act of 1968, Age Discrimination Act of 1975, Title IX of the Education Amendments Act of 1972, Executive Order 11063, Executive Order 11246, Executive Order 12892, Executive Order 12898, Executive Order 13166, and Executive Order 13217.



The HUD Fair Housing and Equal Opportunity (FHEO) Office has advised federal entitlement communities to update their Analysis of Impediments (AI) to Fair Housing Choice to coincide with their Five Year Consolidated Plan, and then every five (5) years thereafter. As part of its Annual Action Plan, the County must additionally sign certifications every year stating that the County will affirmatively further fair housing. This means that the County will conduct an Analysis of Impediments to Fair Housing Choice (AI), take appropriate actions to overcome the effects of any impediments identified through the AI, and maintain records reflecting what analysis and corrective actions were taken.

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

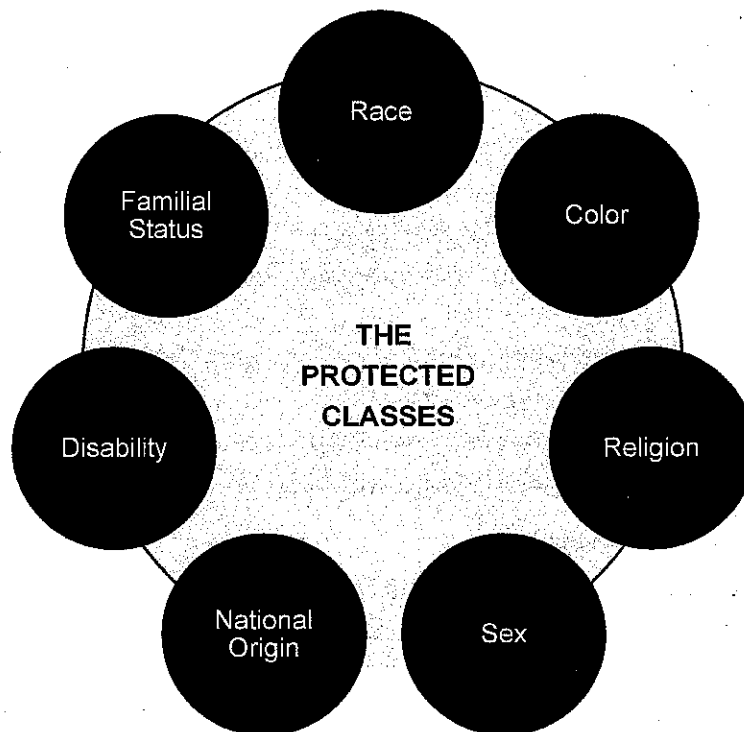


Therefore, Lehigh County has prepared this 2018-2022 Analysis of Impediments to Fair Housing Choice (AI) in cooperation with the Lehigh County Housing Authority. The findings produced through this analysis will be further addressed in the County's FY 2019-2023 Five Year Consolidated Plan.

This analysis focuses on the status and interaction of six (6) fundamental conditions within Lehigh County:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities for minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

The Fair Housing Act was originally passed in 1968 to protect buyers and renters from discrimination from sellers and landlords by making it unlawful to refuse to sell or rent property to persons included under the category of a protected class. The Fair Housing Act prohibits discrimination against persons based on their *race, color, religion, sex, national origin, disability, or familial status* in the sale, rental, and financing of housing.



As population shifts and economic trends grow, Fair Housing issues vary drastically between jurisdictions and regions. Therefore, Lehigh County and LCHA are taking a more efficient and proactive approach towards affirmatively furthering fair housing choice for County residents on both a local level and a regional level.

The collaboration between Lehigh County and the Lehigh County Housing Authority has produced beneficial insight into the issues affecting the housing market of Lehigh County. While certain fair housing issues are regional in scale, this AI strives to identify strategies and goals it can take to address the barriers that are impacting Fair Housing Choice for the County's residents.

The methodology employed to undertake this Analysis of Impediments included:

- **Research**

- A review was performed of the County's *2009 Analysis of Impediments to Fair Housing Choice*, *Comprehensive Plan - The Lehigh Valley... 2030*, *One Lehigh Valley Sustainability Plan*, *FutureLV Regional Comprehensive Plan*, *Regional Housing Plan*, *LVPC's Lehigh Valley Transportation Study*, and *LVPC's MoveLV Long-Term Transportation Plan*.
- A review of the Lehigh County Housing Authority's *Affirmative Fair Housing Marketing Plan (AFHMP)*.



- The most recent demographic data for the County was analyzed from the U.S. Census, which included general, demographic, housing, economic, social, and disability characteristics.
- A review of the residential segregation data from CensusScope was undertaken.
- A review of the U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (HUD-CHAS) data was undertaken.
- A review of financial lending institutions through the Home Mortgage Disclosure Act (HMDA) database was completed.
- A review of the real estate and mortgage practices was undertaken.
- Home mortgage foreclosure data was also reviewed.
- **In-Person Meetings/Interviews**
 - Meetings were conducted with the following:
 - o Allentown Housing Authority (Executive Director)
 - o Casa Guadalupe (Executive Director)
 - o Catholic Charities of Diocese of Allentown (County Supervisor)
 - o Center for Vision Loss (Executive Director)
 - o Fulton Mortgage Company (Loan Mortgage Officer)
 - o Greater Lehigh Valley Realtors (Chief Executive Officer)
 - o Habitat for Humanity (Executive Director)
 - o Hispanic American Organization (President)
 - o Housing Association Development Corporation (Executive Director)
 - o Housing Authority Tenant Council and Housing Choice Voucher Holders
 - o Housing Equality Center (Executive Director)
 - o Lehigh and Northampton Transportation (LANta) (Executive Director)
 - o Lehigh Career and Technical Institute (Director of Post-Secondary Workforce Education)
 - o Lehigh County (County Executive, County Solicitor, DCED Director)
 - o Lehigh County Conference of Churches (Executive Director)
 - o Lehigh County Housing Authority (Deputy Director, Section 8 Program Coordinator)
 - o Lehigh Valley Center for Independent Living (Executive Director)
 - o Lehigh Valley Community Land Trust
 - o Lehigh Valley Planning Commission (Principal Planner)
 - o Neighborhood Housing Service of the Lehigh Valley (Acting Executive Director)
 - o New Bethany Ministries (Executive Director)



- North Penn Legal Services (Executive Director)
- Northwestern School District
- QNB Bank
- The Literacy Center (Interim Executive Director)
- Valley Youth House and Coordinated Entry Referral System (Associate Director)
- **In-Person Interviews**
 - Phone interviews were conducted with the following:
 - Borough of Catasauqua (Borough Manager)
 - Catholic Charities of Diocese of Allentown (County Supervisor)
 - City of Allentown (HUD Grants Manager)
 - Communities in Schools of the Lehigh Valley (President & CEO)
 - Community Action Committee of Lehigh Valley (Executive Director)
 - Emmaus Borough (Borough Manager)
 - Greater Lehigh Valley Realtors (Chief Executive Officer)
 - Lehigh and Northampton Transportation (LANTA) (Executive Director)
 - Lehigh County Community College (Dean, School of Employer Engagement and Community Education)
 - Lehigh Valley Partnership for a Disability Friendly Community (Vice President)
 - Lehigh Valley Planning Commission (Executive Director)
 - RENEW Lehigh Valley (Executive Director)
 - Salvation Army (Shelter Director)
 - Slatington Borough (Borough Manager)
 - Turning Point (Executive Director)
 - Surveys were sent to each housing, social service, and community development agency that was invited to the roundtable discussions. Follow up phone calls were made when an organization neither returned a survey nor attended a meeting.
- **Analysis of Data**
 - Low- and moderate-income areas were identified and mapped.
 - Concentrations of minority populations were identified and mapped.
 - Concentrations of owner-occupied and renter-occupied housing units were identified and mapped.
 - Fair housing awareness in the community was evaluated.
 - The locations of Housing Cost Burdens throughout the County were analyzed.
 - The locations of CDBG expenditures throughout the County were analyzed.



- The County's Five Year Goals and Objectives were reviewed.
- **Potential Impediments**
 - Public sector policies that may be viewed as impediments were analyzed.
 - Private sector policies that may be viewed as impediments were analyzed.
 - The status of previously identified impediments was analyzed.
- **Citizen Participation**
 - Electronic copies of a fair housing survey were made available on the County's website and physical copies were placed on public display to encourage resident input. The surveys were provided in both English and Spanish. Links to the survey were also posted on Lehigh County's Facebook page. The online survey produced 183 responses in English and 11 responses in Spanish for a total of 194 responses. See copy of survey form in the Appendix Section.
 - Lehigh County and the Lehigh County Housing Authority held two (2) Public Meetings to engage the public and local organizations/agencies and help identify issues impacting Fair Housing Choice. The First Public Meeting was held on Monday, June 5, 2017 at the Lehigh Valley Planning Commission Office and the Second Public Meeting was held on Tuesday, June 6, 2017 at the Whitehall Township Municipal Building.
 - Notices for the public meetings were published in the "Morning Call," the local newspaper of general circulation in the area, and in the Spanish language newspaper, "El Torero."
 - Flyers publicizing the public meeting were distributed in both English and Spanish to the community and handed out to agencies at the social service, community development, and housing provider meetings.
 - The Lehigh County Housing Authority posted the public meeting flyers in five (5) office locations throughout the County.
 - Lehigh County and LCHA met with representatives from twenty-five (25) local housing, community development, realtors, and social service organizations through a series of small group discussions. These were held with the following types of organizations:
 - Local housing authorities
 - Advocacy organizations
 - Direct housing stakeholders
 - Social service providers
 - Public housing residents and Section 8 Voucher holders
 - Lehigh County officials
 - Greater Lehigh Valley Realtors Association



- Planning organizations
- Local fair housing advocacy organizations
- Transportation groups
- Local CDBG communities
- Banks/financial organizations
- Lehigh County and LCHA conducted phone interviews with fifteen (15) additional housing, community development, and social service organizations who were unable to attend the public hearings or individual group meetings.
- To obtain a greater understanding of the issues affecting persons with disabilities, Lehigh County and LCHA held meetings with the Lehigh Valley Center for Independent Living and the Center for Vision Loss. Additionally, a phone interview was completed with the Lehigh Valley Partnership for a Disability Friendly Community.
- The 2018-2022 Analysis of Impediments to Fair Housing Choice was made available on the County's Department of Community and Economic Development (DCED) website at <https://www.lehighcounty.org/-Departments/Community-Economic-Development> and a hardcopy was placed at the following location beginning on January 24, 2019:
 - Lehigh County
Department of Community and Economic Development
Lehigh County Government Center, Room 519
17 South Seventh Street
Allentown, Pennsylvania 18101
- Lehigh County held two Public Hearings on the "draft" 2018-2022 Analysis of Impediments on Tuesday, February 5 at 11:00 AM and 5:30 PM. There was one attendee at the AM public hearing who commented on how interesting it was to see statistics on the amount of low- and moderate-income individuals in the City of Allentown compared to the rest of Lehigh County. The commenter also mentioned that the housing stock may be too dense given the housing stock, and that the City of Allentown also uses North Penn Legal Services for Fair Housing complaints.

Based on the data analysis and citizen participation process, Lehigh County and LCHA staff identified the following issues impacting fair housing choice in Lehigh County:

- **Housing Opportunities:**
 - There is a lack of affordable housing in Lehigh County that is decent, safe, and sanitary.



- There is a lack of Federal and State funds for housing subsidies and the development of new affordable housing is not economically feasible for private developers.
- There is a lack of affordable housing units in areas of opportunity where low-income persons and households may move.
- There is a lack of affordable housing being built by private developers in the County due to the lack of available sites that are affordable.
- The lack of infrastructure in the County limits construction and increases the project costs so the development is not affordable to lower income households.
- **Housing Choice:**
 - Between 2000 and 2010, the County's population increased by 13.98%, which has created a greater demand for housing, especially affordable housing.
 - The special needs population in Lehigh County has increased in the last 15 years; however less than one percent (1%) of all new housing units built in that period are considered accessible.
 - There are physical, economic, and social justice barriers that impede the development of new affordable and accessible housing in Lehigh County.
 - Housing units that are deteriorated and below code standards tend to be available at affordable rents.
 - There is a lack of "mixed-income" housing being built in the County.
- **Cost Overburden:**
 - Lower household incomes create cost overburden housing conditions; approximately 27.45% of homeowners and 54.3% of renters in the County are cost overburdened of 30% or more.
 - The elderly, on fixed income, cannot afford to make the repairs, alterations, and accommodations to their homes to make them accessible to their needs.
- **Disability/Accessibility:**
 - There is a lack of housing in the County that is accessible and affordable for the elderly, the disabled, and persons with special needs.
 - The denial by landlords to make reasonable modifications and accommodations limits the amount of accessible units in the County that are for rent for persons with special needs.
- **Fair Housing:**
 - There is a lack of uniform regulations, administration, and enforcement of the codes and ordinances, which allows "exclusionary zoning" to occur without County oversight and control.



- Tenants and homebuyers do not always file housing discrimination complaints when renting or buying a home.
- Persons with Limited English Proficiency (LEP) do not always have a fair housing choice.
- There is a lack of cooperation and a forum to promote new affordable housing throughout the County.
- There is a lack of awareness of tenants' rights, including what reasonable modifications and accommodations are.
- **Access/Mobility:**
 - The lack of public transportation in the County is not convenient for work, health care, shopping, etc., which limits the choices where a low-income household can live.
 - Families and individuals have a right to live wherever they chose if affordable housing is available outside areas of concentration.

Using these findings, Lehigh County and the LCHA developed the following impediments for the 2018-2022 Analysis of Impediments to Fair Housing Choice and defined specific goals and strategies to address each impediment.

- **Impediment 1: Lack of Affordable Housing**

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

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

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

- **1-A:** Continue to promote the need for affordable housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is affordable.
- **1-B:** Encourage and promote the development, construction, and/or rehabilitation of mixed-income housing in areas of the County which do not have a concentration of low-income households.



- **1-C:** Encourage and promote the development, construction, and/or rehabilitation of affordable housing in mixed-use properties with retail/office space on the lower levels and residences above.
- **1-D:** Support financially, the rehabilitation of existing housing owned by seniors and lower-income households to conserve the existing affordable housing stock in the County.
- **1-E:** Provide financial and development incentive to private developers and non-profits to construct and/or rehabilitate affordable housing.
- **1-F:** Continue to work with the Lehigh Valley Planning Commission Housing Study Group to promote the development, construction, and rehabilitation of affordable housing.

- **Impediment 2: Lack of Accessible Housing**

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

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

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

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



- **Impediment 3: Barriers Limiting Housing Choice**

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

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

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

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

- **Impediment 4: Lack of Fair 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.



I. Introduction

Lehigh County is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) Program. In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively further fair housing," the community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice and what steps it will take to affirmatively further fair housing. The HUD Fair Housing and Equal Opportunity (FHEO) Office has advised the Federal entitlement communities to prepare a new Analysis of Impediments to Fair Housing Choice to coincide with the Five Year Consolidated Plan, and then every five (5) years thereafter.

HUD defines "fair housing choice" as:

"The ability of persons, regardless of race, color, religion, sex, national origin, familial status, or handicap, of similar income levels to have available to them the same housing choices"

This Analysis of Impediments to Fair Housing Choice consists of the following six (6) conditions:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.



HUD-FHEO suggests that communities conducting an Analysis of Impediments should consider the policies concerning “visitability,” in Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act. Housing that is “visitable” means that it has the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor.

- “Visitable” housing has at least one accessible means of ingress/egress, and all interior and bathroom doorways have as a minimum a 32-inch clear opening.
- Section 504 of the Rehabilitation Act (24 CFR Part 8), known simply as “Section 504,” prohibits discrimination against persons with disabilities in any program receiving Federal financial assistance.
- The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments.
- The Fair Housing Act requires property owners to make reasonable modifications to units and/or public areas in order to allow a disabled tenant to make full use of the housing unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant the full use of the housing unit.

In regard to local zoning ordinances, the Fair Housing Act prohibits local government from making zoning or land use decisions, or implementing land use policies that exclude or discriminate against persons of a protected class.

Lehigh County previously prepared an Analysis of Impediments to Fair Housing Choice in 2009. Lehigh County has prepared this 2018-2022 Analysis of Impediments to Fair Housing Choice (AI) in cooperation with the Lehigh County Housing Authority. The findings produced through this analysis will be further addressed in the County’s FY 2019-2023 Five Year Consolidated Plan.

The document is designed to act as a planning tool, providing Lehigh County and the Lehigh County Housing Authority with the necessary framework to strategically reduce any identified impediments to fair housing choice over the next five (5) years and continue to make modifications based on events and activities in the community during that time period.



In order to affirmatively further fair housing, Lehigh County must look beyond its boundaries and coordinate fair housing with Northampton County and the municipalities of Allentown, Bethlehem, and Easton. Fair housing choice is the central goal of the AI, which stresses that opportunities should be made available to low-income residents and members of the protected classes who may want to live in or around Lehigh County.



II. Background Data

The demographic, housing, economic, and social characteristics of Lehigh County were evaluated as a basis for determining and identifying any existing impediments to fair housing choice. However, it must be noted that this AI pertains to the Lehigh County Housing Authority and Lehigh County. As the City of Allentown is a separate Federal Entitlement community, the City is not included in this analysis. However, some data used in this report includes the entirety of Lehigh County, which contains the majority of the City of Allentown and is noted in the text. As the Cities of Allentown, Bethlehem, and Easton have their own housing authorities, LCHA offers assistance to those living in the Lehigh County jurisdiction.

Lehigh County is located in the Lehigh Valley and approximately 35 miles northwest of Philadelphia and approximately 70 miles from New York City. Lehigh Valley, excluding the City of Allentown, has a population of 239,168 (2016 ACS) and is surrounded by the Counties of Northampton, Carbon, Schuylkill, Berks, Montgomery, and Bucks. Lehigh County was created on March 6, 1812 from part of Northampton County and named for the Lehigh River. Per the Pennsylvania Historic Museum Commission, the name "Lehigh" is derived from the German "Lecha," which comes from the Native American term "Uchauwekink," meaning "where there are forks." The County adopted a home rule charter in November of 1975.

Understanding the County's past is crucial in determining what factors have impacted, are impacting, and/or will impact living conditions of its residents. To provide a more in-depth look at the conditions in Lehigh County, demographic, housing, economic, and other Census data were analyzed, including data from the 2000 and 2010 U.S. Census, and the 2012-2016 American Community Survey Five-Year Estimates.

This Census data, along with other databases such as the HUD CHAS Data, have been used to evaluate Lehigh County's demographic and socio-economic characteristics, as well as other conditions affecting fair housing choice. Part VII, Appendix A of this report contains extensive demographic data that is summarized and/or illustrated throughout this report.



A. Population, Race, Ethnicity, and Religion

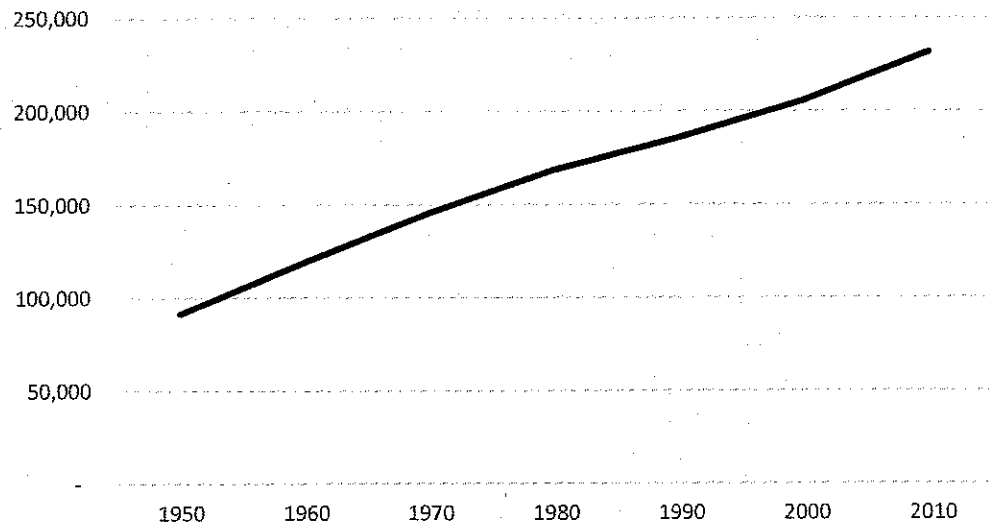
Population

Lehigh County has experienced growth every decade since its incorporation. The County's population (including the City of Allentown) steadily increased between 1820 and 1930. It stayed the same until after World War II. Since 1940, the County's population has grown from 177,893 to 358,792 in 2016 (ACS estimates).

Lehigh County, along with the region, is experiencing strong population growth due to its proximity to Philadelphia and New York City. In addition, strong economic growth is occurring in the fields of health care, social assistance, administration, waste management services, transportation, and distribution/warehousing. According to the Lehigh County Planning Commission, the Lehigh Valley's population is expected to increase by almost 230,000 residents over the next 30 years to approximately 874,000 people.

While the City of Allentown is still the largest city in the region, the areas in Lehigh County surrounding the City have been growing at much faster rate. While the City of Allentown accounted for 53.9% of the County's population in 1950, that number is now just 33.8%. Thus, almost two-thirds of Lehigh County residents live outside of the City of Allentown. As this A.I. focuses on the Lehigh County jurisdiction, the following chart illustrates just the population of Lehigh County living outside the City of Allentown; this population increased 16.4% between 2000 and 2016, growing from 205,458 to 239,168.



**Chart II-1 Population Change for Lehigh County, PA**

Source: U.S. Census Data (1950 – 2010)

Race

The following table highlights the racial composition of Lehigh County as shown in the 2000 U.S. Census and the 2012-2016 American Community Survey 5-Year Estimates. This data was calculated by subtracting the City of Allentown's statistics from the County as a whole in order to get just the County jurisdiction's numbers.



**Table II-1 - Race and Hispanic or Latino
Population in Lehigh County, PA**

Race and Hispanic or Latino	2000 U.S. Census		2012-2016 American Community Survey 5-Year Estimates	
	Population Count	Percentage	Population Count	Percentage
Total	205,458	100.0%	239,168	100.0%
White alone	194,229	94.5%	212,021	88.6%
Black or African American alone	2,727	1.3%	7,380	3.1%
American Indian and Alaska Native alone	197	0.1%	319	0.1%
Asian alone	4,131	2.0%	9,225	3.9%
Native Hawaiian and Other Pacific Islander alone	38	0.0%	8	0.0%
Some other race alone	2,214	1.1%	5,280	2.2%
Two or more races	1,922	1.9%	4,935	2.1%
Hispanic or Latino	5,823	2.8%	19,725	8.2%

Source: 2000 U.S. Census & 2012-2016 ACS Estimates

Lehigh County's population (the total County population minus the City of Allentown's population) increased by 33,710, or 16.4%, between 2000 and 2016. While the White population increased by 17,792 during this same period, its percentage of the total population decreased from 94.5% to 88.6%. The next largest ethnic cohort was Hispanic or Latino, which increased from just 2.8% of the County's population in 2000 to 8.2% in 2016. The Black or African-American population almost tripled, increasing from 2,727 (1.3% of the County's total population) to 7,380 (3.1%). The Asian population increased from 4,131 in 2000 to 9,225 in 2016, an increase of 123.3%; its share of the County's population increased from 2.0% to 3.9%.

Another way to consider racial distribution in a community is to look at the dissimilarity indices for an area. The **Dissimilarity Index (DI)** is based on the data from the 2010 U.S. Census and ACS data which measures whether one particular group is evenly distributed across census tracts in the



metropolitan area in the same way as another group. More specifically, the index represents the extent to which the distribution of any two (2) groups (racial, ethnic, etc.) differs across census tracts. While there are limitations due to outside factors and scale size, the Dissimilarity Index can provide an effective method of analyzing segregation and identifying trends in a community.

A high value indicates that the two groups tend to live in different tracts. Dissimilarity Index values between 0 and 39 generally indicate low segregation; values between 40 and 54 generally indicate moderate segregation; and values between 55 and 100 generally indicate a high level of segregation. However, context is important in interpreting the dissimilarity index. The index measures the degree two groups are segregated in a particular geographic area; however, the index alone does not provide the location of the segregation within the geographic area.

HUD has provided Dissimilarity Index values for the Lehigh County Jurisdiction (excluding the City of Allentown), but also provides data for the surrounding Allentown-Bethlehem-Easton PA-NJ MSA. This allows for greater comparison of the data.

In Lehigh County, the Dissimilarity Indices for the White/Non-White (29.26), Black/White (36.53), and Hispanic/White (30.12) populations have scores below 39, indicating low segregation. The Asian or Pacific Islander/White has a moderate amount of segregation per its Dissimilarity Index of 42.10.

On the regional level, the Dissimilarity Indices for the Allentown-Bethlehem-Easton PA-NJ MSA are all slightly higher. The Dissimilarity Indices for the White/Non-White (48.69), Black/White (49.91), Hispanic/White (56.51), and Asian or Pacific Islander/White (41.99) all indicate moderate segregation.

Table II-3 – Dissimilarity Index in Lehigh County, PA

Racial/Ethnic Dissimilarity Index	Lehigh County				Allentown-Bethlehem-Easton PA-NJ MSA			
	1990	2000	2010	2013	1990	2000	2010	2013
Non-White / White	28.99	27.85	26.31	29.26	49.34	50.34	45.13	48.69
Black / White	37.51	30.29	30.83	36.53	53.73	50.57	45.81	49.91
Hispanic / White	30.66	34.18	31.57	30.12	58.20	60.03	55.43	56.51



Asian or Pacific Islander/White	43.44	36.68	34.91	42.10	37.62	35.85	35.67	41.99
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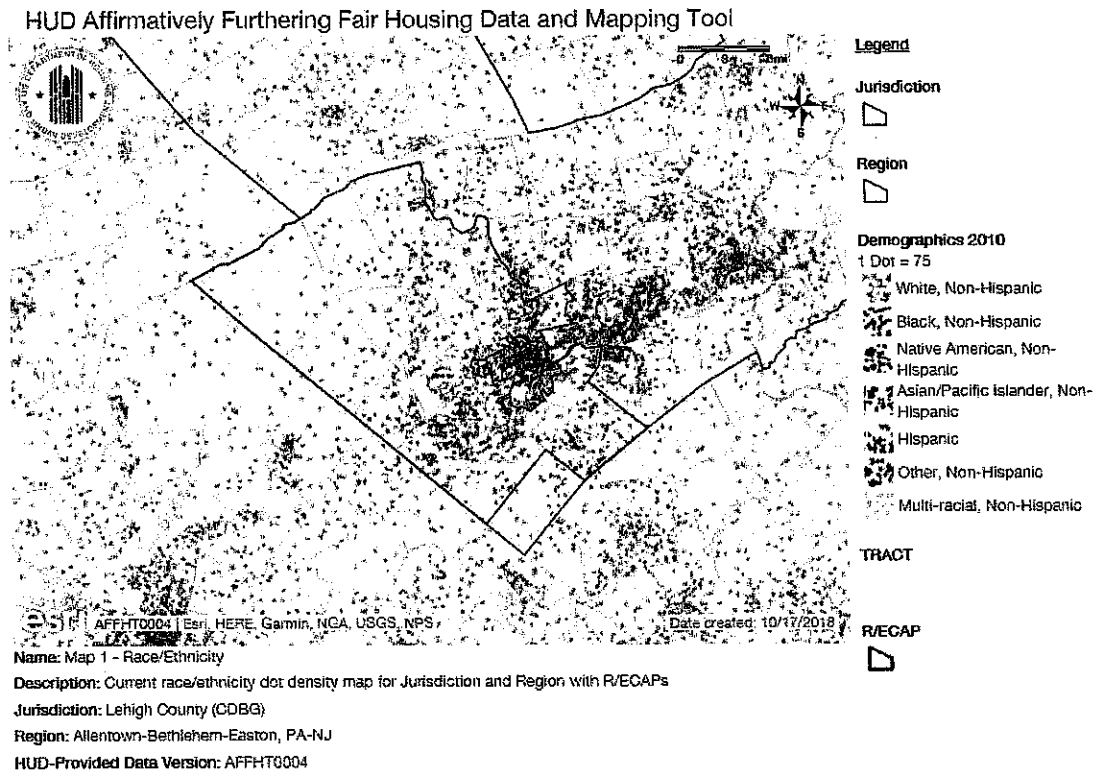
Source: 2000 U.S. Census & 2012-2016 ACS Estimates

The Dissimilarity Index (DI) trends among social/ethnicities in Lehigh County have remained fairly constant over the past twenty-five years; no racial/ethnic combinations experienced more than a 3.5% change in its Dissimilarity Index. However, all DI scores except Non-White/White decreased between 1990 and 2013, indicating less segregation; Black/White decreased 2.61%; Hispanic/White decreased 1.76%; and Asian or Pacific Islander/White decreased 3.08%. The Non-White/White DI increased during this period, but by only 0.93%.

On the regional level, the Dissimilarity Indices for the Allentown-Bethlehem-Easton PA-NJ MSA also remained fairly constant. The Dissimilarity Indices for the White/Non-White (48.69), Black/White (49.91), Hispanic/White/ (56.51), and Asian or Pacific Islander/White (41.99) all indicate moderate segregation. However, all combinations decreased in Dissimilarity Index except for Asian or Pacific Islander/White, which previously stated can be due to small sample size. The White/Non-White cohort's Dissimilarity Index decreased 1.32%; the Black/White Dissimilarity Index decreased 7.11%, and the Hispanic/White Dissimilarity Index decreased 2.90%.

While the Dissimilarity Index scores show little segregation in Lehigh County, there are areas of the County with much higher concentrations of one race over other races. This Analysis of Impediments to Fair Housing Choice is supplementing its data with that provided in HUD's AFFH Tool, which was originally created for the Assessment of Fair Housing.

Maps 1, 2 and 4 of the AFFH Tool found on the following pages illustrates the distribution of races throughout the County and region. While there are areas of the County with high percentages of minorities, the Cities of Allentown, Bethlehem, and Easton have the largest minority populations in the region. Map 1 illustrates concentrations of minorities in Lehigh County, which appear to be located in the areas of Macungie Borough, Alburtis Borough, Lower Macungie Township (Ancient Oaks Census Designated Place [CDP]), Emmaus Borough, Fountain Hill Borough, Whitehall Township (Fullerton CDP), and Slatington Borough.



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

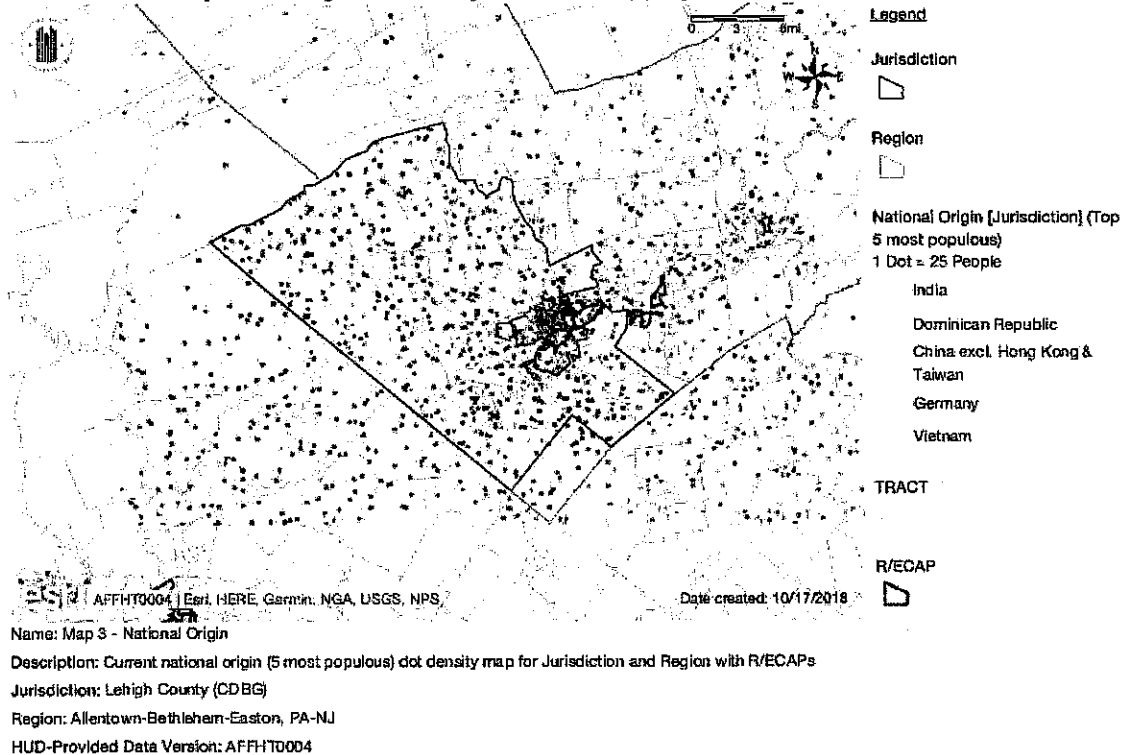
Per its National Origin maps and data, there is a higher rate of concentration of residents by national origin than by race. Based on the maps, the Vietnamese population is concentrated in Lower Macungie Township (Ancient Oaks CDP), Macungie Borough, Upper Saucon Township, and Whitehall Township (Hokendauqua CDP). The German population is concentrated in Fogelsville, Whitehall Township (Fullerton CDP), Lower Macungie Township (Ancient Oaks CDP), and Upper Saucon Township. Residents of Chinese descent are concentrated in Coopersburg Borough,



Upper Macungie Township, and Catasauqua Borough. Map 3 illustrates that descendants of the Dominican Republic are concentrated in the areas around Emmaus Borough, Whitehall Township (Hokendauqua CDP), and Whitehall Township (Fullerton CDP). The 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.

The areas of high concentration of ethnicities are all areas adjacent to the City of Allentown, which has the largest population in the region and is home to the largest economic base of the County. When comparing to the Allentown-Bethlehem-Easton PA-NJ MSA, there are areas with much higher concentrations of racial minorities, most notably the City of Allentown and the Cities of Bethlehem, Easton, and Phillipsburg and Wilson Borough in New Jersey.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

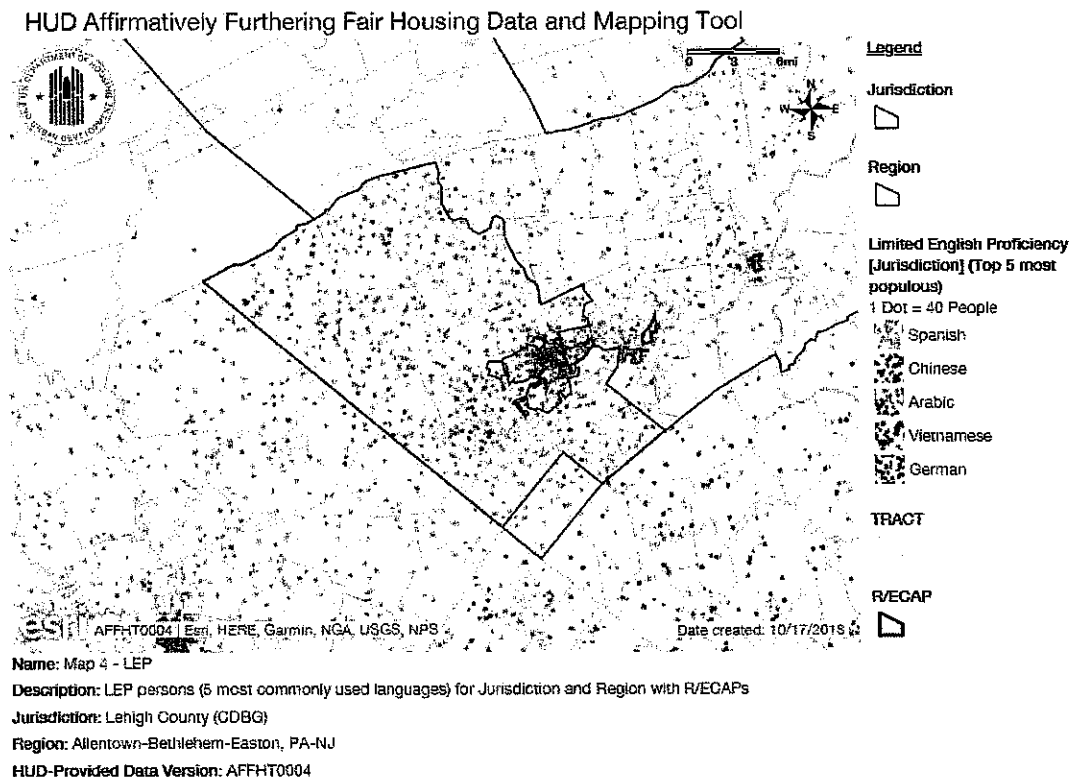


According to the 2012-2016 American Community Survey, the Hispanic population is the largest minority group in the Lehigh County jurisdiction, making up approximately 8.2% of the population and with a dissimilarity



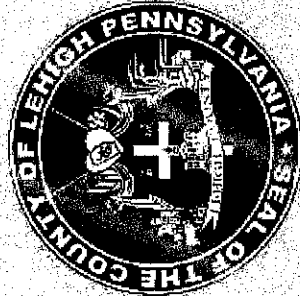
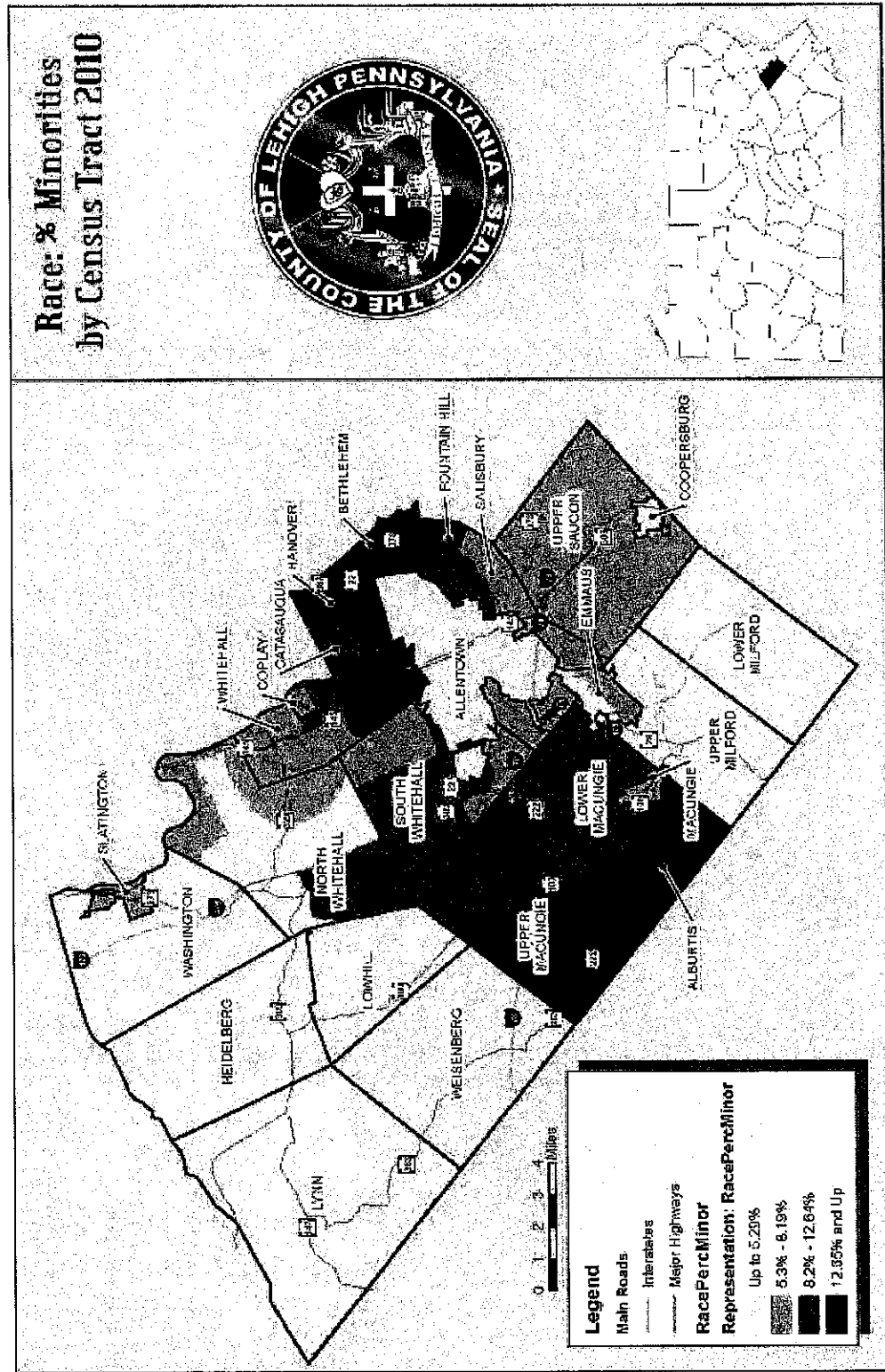
index of 30.12. The Asian population is the next largest minority population, making up 3.9% of the County's population and with a dissimilarity index of 42.10. The Black/African American population makes up 3.1% of the jurisdiction's population and has a dissimilarity index of 36.53. All other minority groups have relatively small populations, which introduces some error into the calculation of the dissimilarity indices. More specifically, for populations under 1,000 people, the dissimilarity index may be high even if the population is evenly distributed across the MSA or State.

Map 4 illustrates Limited English Proficiency in Lehigh County. Based on the map, German-speaking individuals are common in Whitehall Township (Fullerton CDP and Hokendauqua CDP). Spanish-speaking individuals are concentrated in the areas of Macungie Borough, Emmaus Borough, Fountain Hill Borough, Whitehall Township (Fullerton CDP), and the areas just north and west of the City of Allentown.



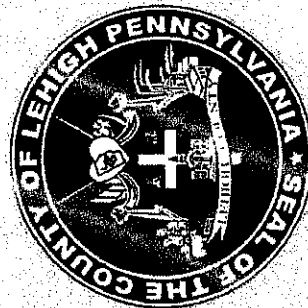
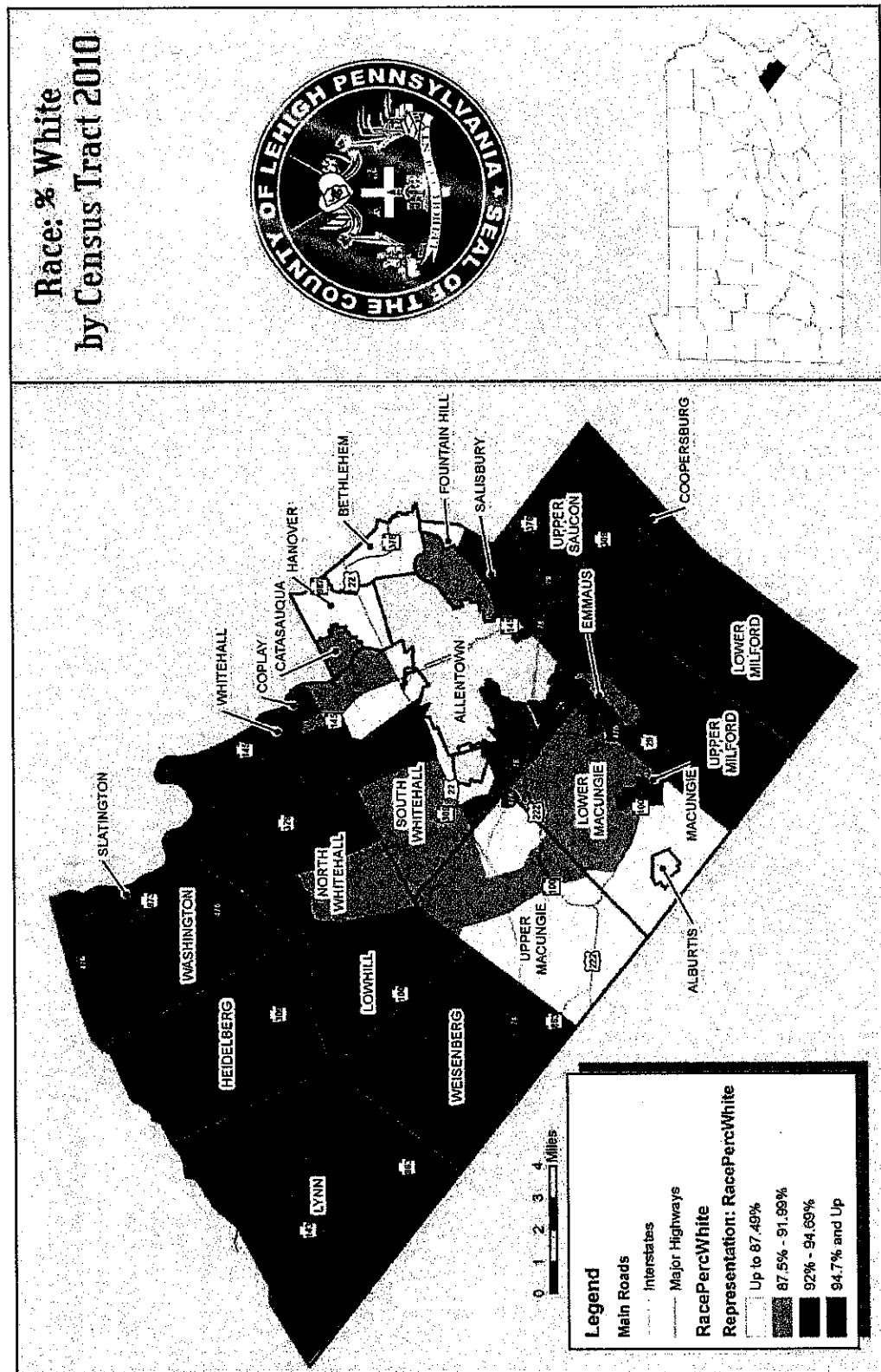


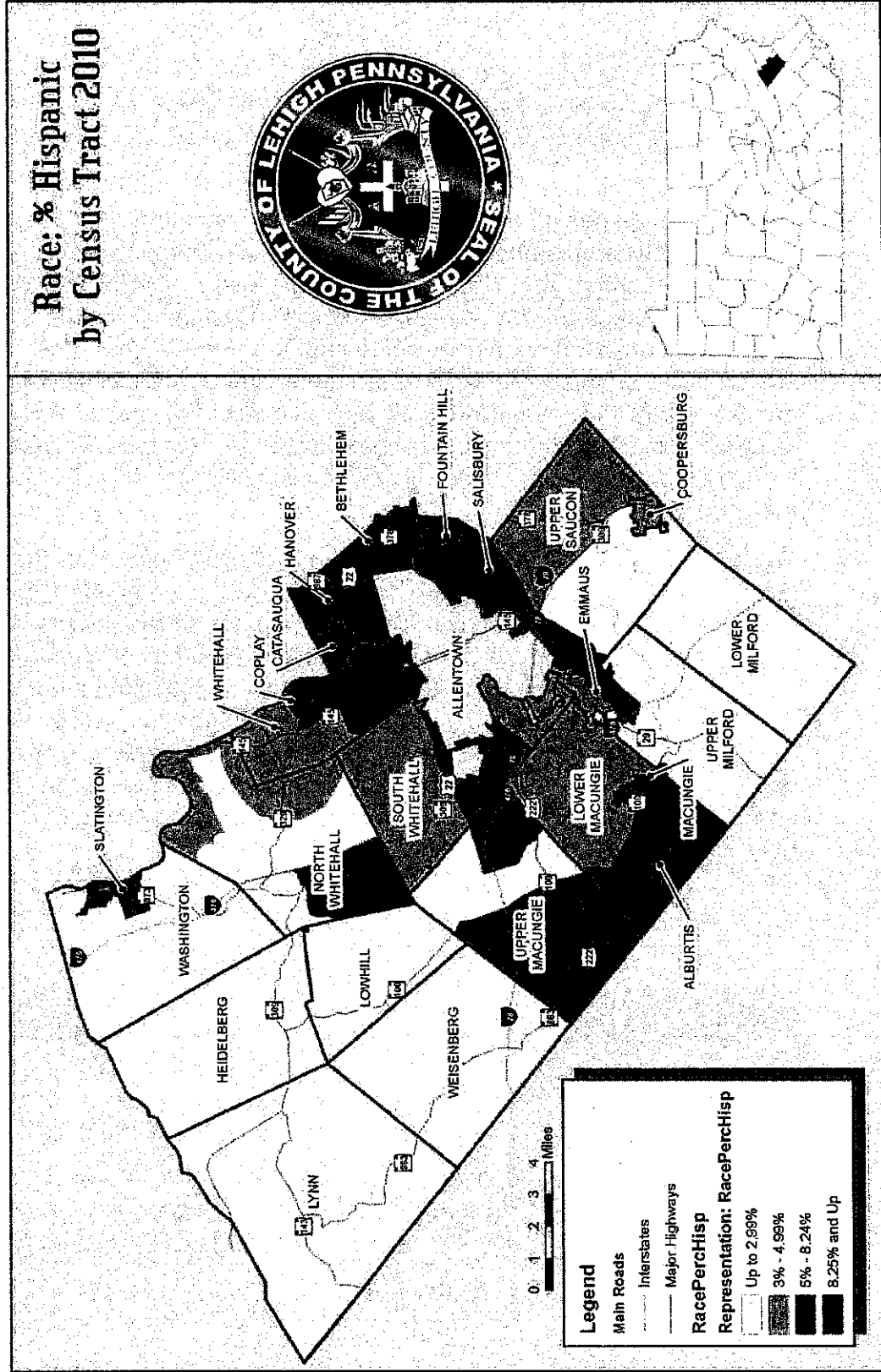
The following maps found on pages 27-29 highlight the racial composition by census tracts across the County. The darkest shaded block groups indicate the highest concentration of each population group, while the lightest shaded block groups indicate the lowest concentration of each population group. The White population is primarily concentrated in outlying areas of the County, particularly the northwest and southern corners. The minority population is primarily concentrated around the City of Allentown, including the areas of Upper and Lower Macungie Township, Whitehall Township, Catasauqua Borough, and Fountain Hill Borough. The Hispanic population is concentrated along the eastern edge of the County alongside the City of Allentown.





Background Data







Location of Homes

The AFFH Tool also provides data pertaining to homeownership rates, which allows for an analysis of the location of owner and renter-occupied housing in the County.

The maps on pages 41 and 42 provide an illustration depicting the areas of high home-ownership and areas of high concentrations of rental units. The areas surrounding the City of Allentown, more specifically Whitehall Township (Fullerton), Catasauqua Borough, Fountain Hill Borough, and Emmaus Borough, have higher percentages of rental units. While most of the areas surrounding Allentown and its outer ring suburbs in Lehigh County are less than 14% rental households. However, the areas of Macungie Borough, Emmaus Borough, Slatington Borough, Hanover Township, and Whitehall Township all have higher concentrations of renter-occupied households.

The table below lists the municipalities in Lehigh County with the lowest homeownership rates. According to the 2011-2015 American Community Survey and Table II-3, Hanover Township has the lowest owner-occupied housing rate (49.4%) in the County, followed by Whitehall Township (60.5%) and Heidelberg Township (63.6%). While Hanover (82.9%) and Whitehall (80.3%) Townships both have lower percentages of White residents compared to the County as a whole (86.9%), Heidelberg Township is predominantly White (98.5%). Hanover and Whitehall Townships are both adjacent to the City of Allentown, which has a high percentage of Hispanics (42.8%) and Black (9.6%) residents.

**Table II-3 – Race by Housing Tenure –
Lehigh County, PA (Lowest Rates in County)**

Municipality	Owner	Renter	White	Black	Hispanic
Hanover Township	49.4%	50.6%	82.9%	6.6%	8.0%
Whitehall Township	60.5%	39.5%	80.3%	6.0%	15.6%
Heidelberg Township	63.6%	36.4%	98.5%	1.3%	3.0%
Lehigh County	78.1%	21.9%	86.9%	2.4%	5.8%

Source: AFFH Tool

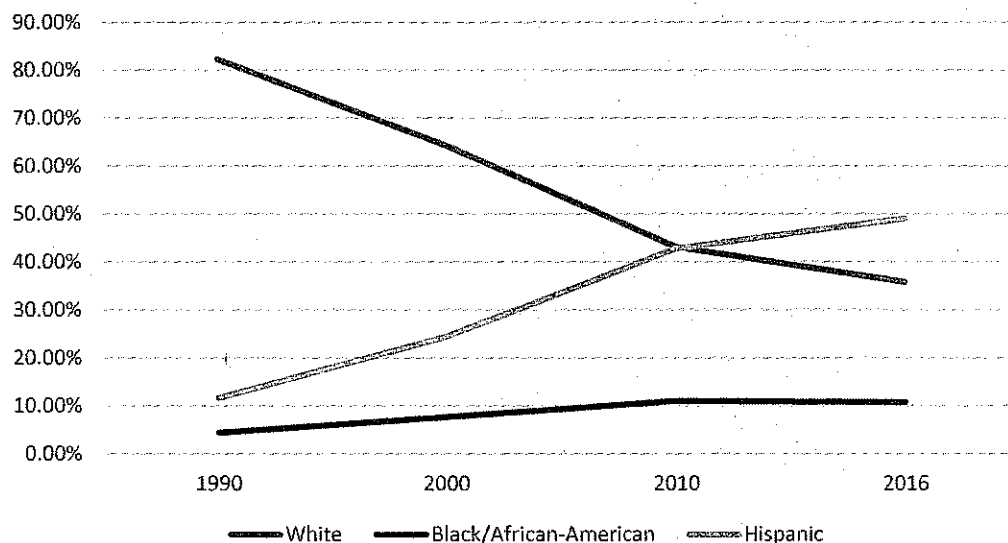


Additional ACS and Census data supports the findings of the AFFH maps and tables regarding areas of high and low homeownership rates. The AFFH maps and tables support the claim that the outer perimeter of Lehigh County has higher homeownership rates rather than the more urban townships and boroughs adjacent to the City of Allentown. The areas closest to the City of Allentown tend to be both more racially and ethnically diverse than the outlying areas of the County and also have a younger population. Lower income residents are drawn to living in more urban locations and many do not yet have the resources needed to purchase a home.

Racial Trends in Neighboring Areas

Due to its location within the Lehigh County jurisdiction, it is beneficial to consider the City of Allentown. The City of Allentown's population has shifted drastically in the past twenty-five years, with the Hispanic population increasing from 11.65% of the population in 1990 to 49.0% in 2016. The Hispanic population is now the largest racial cohort in the City of Allentown.

Chart II-5 – Racial Trends – City of Allentown, PA



Ethnicity

The following table highlights the ethnic ancestries of Lehigh County residents at the time of the 2000 U.S. Census and the 2012-2016 American Community Survey.



Table II-3 – Ethnicity and Ancestry in Lehigh County, PA

ANCESTRY	2000 U.S. Census		2012-2016 American Community Survey	
	Number	Percent	Number	Percent
Total population	79,334	100.0%	93,471	100.0%
American	10,407	5.1%	10,380	4.3%
Arab	2,371	1.2%	4,217	1.8%
Czech	1,425	0.7%	890	0.4%
Danish	349	0.2%	554	0.2%
Dutch	6,125	3.0%	6,578	2.8%
English	13,324	6.5%	15,530	6.5%
French (except Basque)	3,778	1.8%	3,925	1.6%
French Canadian	712	0.3%	682	0.3%
German	70,754	34.4%	76,033	31.8%
Greek	1,334	0.6%	1,685	0.7%
Hungarian	6,407	3.1%	5,118	2.1%
Irish	25,247	12.3%	32,565	13.6%
Italian	19,410	9.4%	25,628	10.7%
Lithuanian	1,170	0.6%	1,334	0.6%
Norwegian	726	0.4%	1,026	0.4%
Polish	10,989	5.3%	13,349	5.6%
Portuguese	498	0.2%	844	0.4%
Russian	2,560	1.2%	2,855	1.2%
Scotch-Irish	2,437	1.2%	1,557	0.7%
Scottish	2,688	1.3%	2,727	1.1%
Slovak	8,253	4.0%	7,735	3.2%
Sub-Saharan African	112	0.1%	1,212	0.5%
Swedish	1,111	0.5%	1,653	0.7%
Swiss	741	0.4%	1,064	0.4%
Ukrainian	4,953	2.4%	4,154	1.7%
Welsh	4,862	2.4%	4,479	1.9%
West Indian	266	0.1%	1,272	0.5%
Other ancestries	39,598	19.3%	-	-

Source: 2000 U.S. Census, 2012-2016 ACS

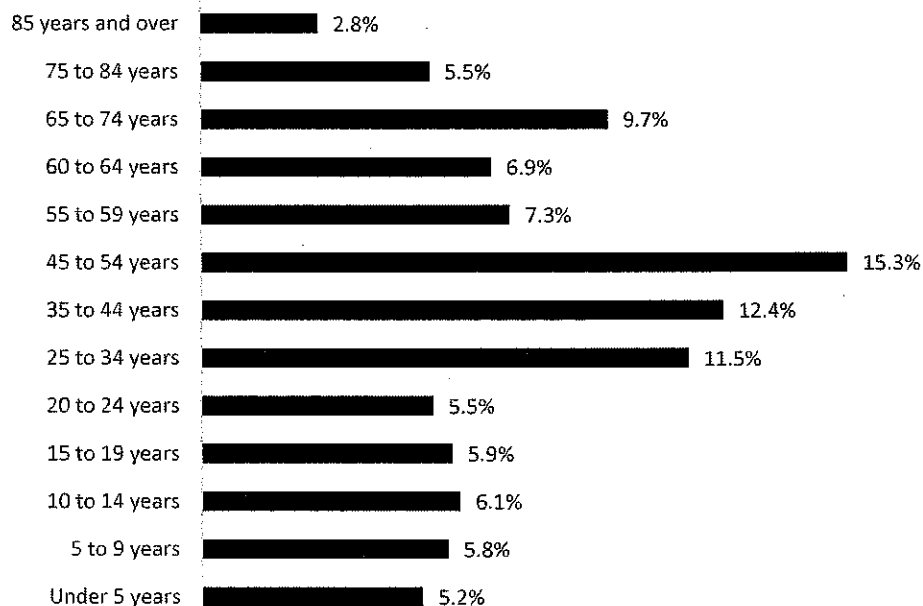
The most common ancestries in Lehigh County include German (31.8%), Irish (13.6%), and Italian (10.7%). The majority of Lehigh County's ethnic populations stayed fairly consistent between 2000 and 2016.



Age

The following chart illustrates age distribution in the Lehigh County at the time of the 2012-2016 American Community Survey. The data shows that currently, children under five years of age represent 5.2% of the population; 23.2% of the County's population is under 20 years of age; and 17.9% of the population is 65 years of age or older.

Chart II-5 – Age of Population in the Lehigh County Jurisdiction, PA



Source: 2012-2016 ACS

The median age in Lehigh County (including the City of Allentown) at the time of the 2000 U.S. Census was 38.3 years. The median age in the County (including Allentown) increased to 39.5 years at the time of the 2012-2016 Five-Year ACS Estimate. Similar to the increase in age of Lehigh County residents between 2000 and 2016, the median age for the Commonwealth of Pennsylvania also increased, from 38.0 to 40.6 years. The median age in Lehigh County is slightly increasing, albeit at a slower level than the Commonwealth of Pennsylvania.

The following map on page 34 illustrates the percentage of the population in Lehigh County that is over the age of 65. The elderly appear to be concentrated among the northern and eastern areas of the County, in





2018 Analysis of Impediments to Fair Housing Background Data

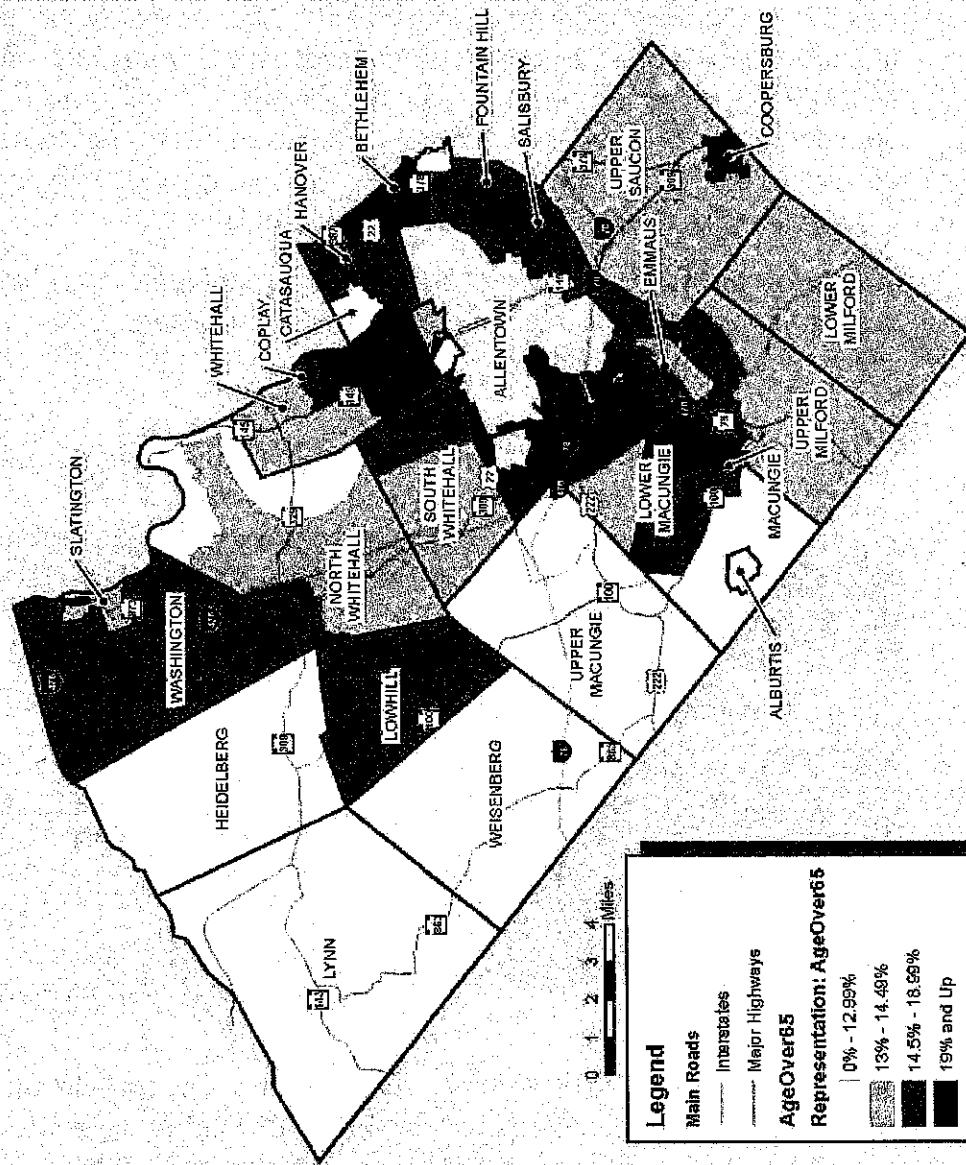
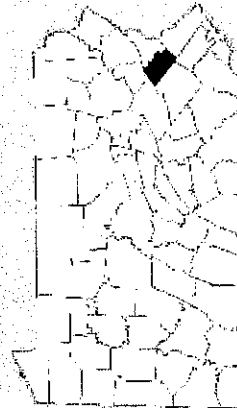
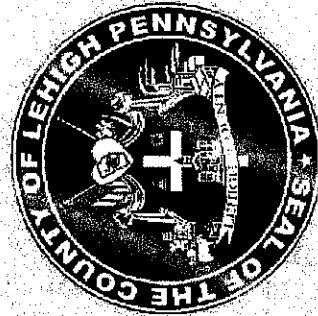


particular surrounding the City of Allentown. This is most likely due to the presence of more medical facilities and transit options in these areas.





Age: % Over 65 Years by Census Tract 2010





Religion

The U.S. Census does not collect data on the religious affiliations of the population in the United States. In an effort to better understand the religious affiliations of the residents of Lehigh County, the data made available by the Association of Religion Data Archives (ARDA) was used. ARDA surveys the congregation members, their children, and other people who regularly attend church services within counties across the country. Although this data appears to be the most comprehensive data that is available, it is unfortunately not entirely complete as it does not accurately include traditional African American denominations. The total number of regular attendees was adjusted in 2010 (the most recent year for which data is available) to represent the population including historic African American denominations. However, the total value cannot be disaggregated to determine the distribution across denominational groups. Furthermore, this data includes residents living in the City of Allentown.

The following table shows the distribution of residents of Lehigh County across various denominational groups, as a percentage of the population which reported affiliation with a church.

Table II-4 - Religious Affiliation in Lehigh County, PA
(As percentage of total population)

	1980	1990	2000	2010
Evangelical Protestant	3.2%	4.2%	3.2%	5.9%
Black Protestant	0.1%	0.1%	0.0%	0.2%
Mainline Protestant	34.1%	30.2%	24.8%	18.4%
Catholic	26.1%	24.5%	26.9%	19.5%
Orthodox	0.3%	0.0%	0.8%	0.8%
Other	0.7%	1.7%	1.9%	5.7%
Unclaimed	35.4%	39.2%	42.4%	49.5%

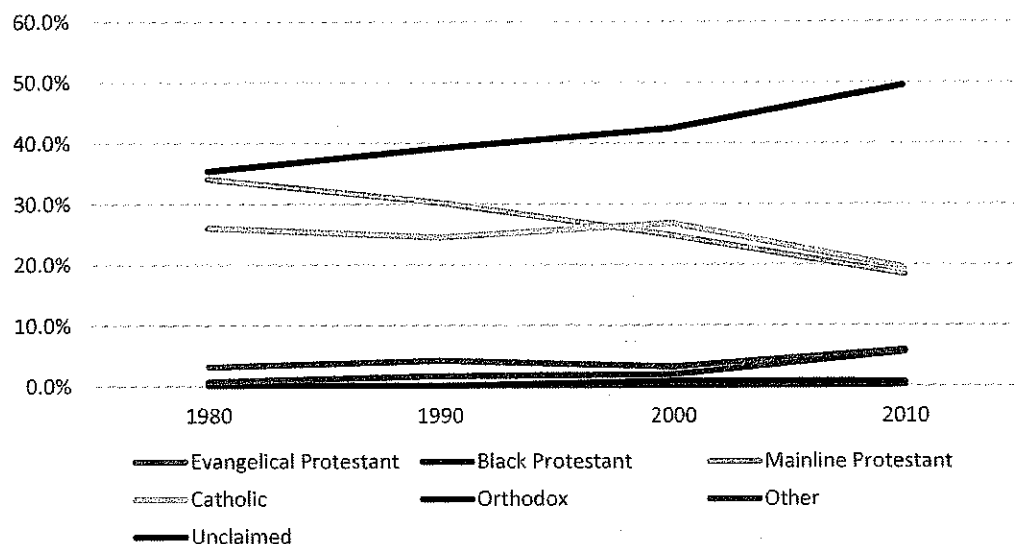
Source: Association of Religion Data Archives

Between 1980 and 2010, Lehigh County saw an overall decrease in the number of people identifying with religious traditions; while 35.4% of the County's population did not affiliate with any religion in 1980, it increased to



49.5% in 2010. Of those that considered themselves religious, there was an increase in Evangelical Protestants and Orthodox Christians, while all other religious groups decreased in numbers and percentage. The following chart illustrates these trends, as well as a line showing the percentage of Lehigh County that is not affiliated with any religion.

Chart II-6 – Religious Affiliation Trends in Lehigh County



Source: Association of Religion Data Archives

B. Households

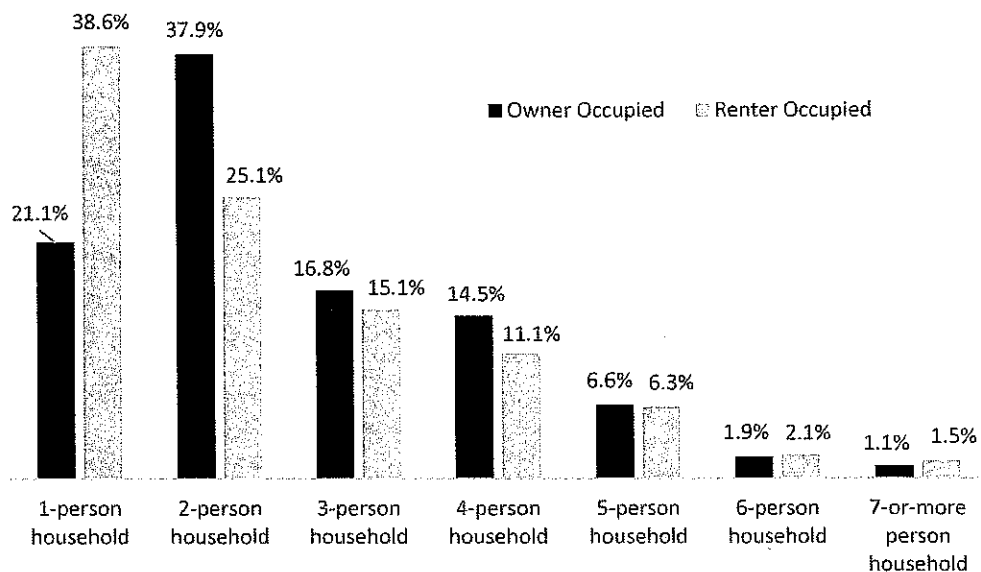
Household Tenure

According to the U.S. Census for 2000, there were 82,950 housing units in Lehigh County. Of these housing units, 96.3% were occupied and 3.7% were vacant. Of the occupied housing units, 77.1% were owner-occupied and 22.9% were renter-occupied. According to the 2016 ACS Estimates, the total number of housing units increased to 397,712, 96.1% of which were occupied and 3.9% of which were vacant. Of the occupied housing units in 2016, 75.0% were owner-occupied and 25.0% were renter-occupied. This was a very slight change from 2000, with owner-occupied housing units and renter-occupied housing units comprising 77.1% and 22.9%, respectively.



Data regarding household size is only available for Lehigh County, including the City of Allentown. In 2000, the average size of the owner-occupied households in Lehigh County was 2.63 persons and the average renter household was 2.13 persons. In 2016, the average size of owner-occupied households increased slightly to 2.66 persons, while the average size of renter-occupied households increased substantially to 2.44 persons from 2.13 persons. The following chart illustrates the breakdown by household size for owner and renter households according to the 2012-2016 ACS Estimates.

Chart II-7 – Household Tenure by Size in Lehigh County, PA



Source: 2012-2016 ACS Estimates

Two-person owner-occupied households are the most common household types, making up 37.9% of all owner-occupied units. One-person renter-occupied units are the most common renter-occupied tenure, making up 38.6% of all renters. While one-person households are more likely to be renter-occupied, households with two (2) to five (5) people are more likely to be owner-occupied.

The following maps on pages 40-42 highlight the distribution of housing units in Lehigh County, including percentage of owner-occupied and renter-

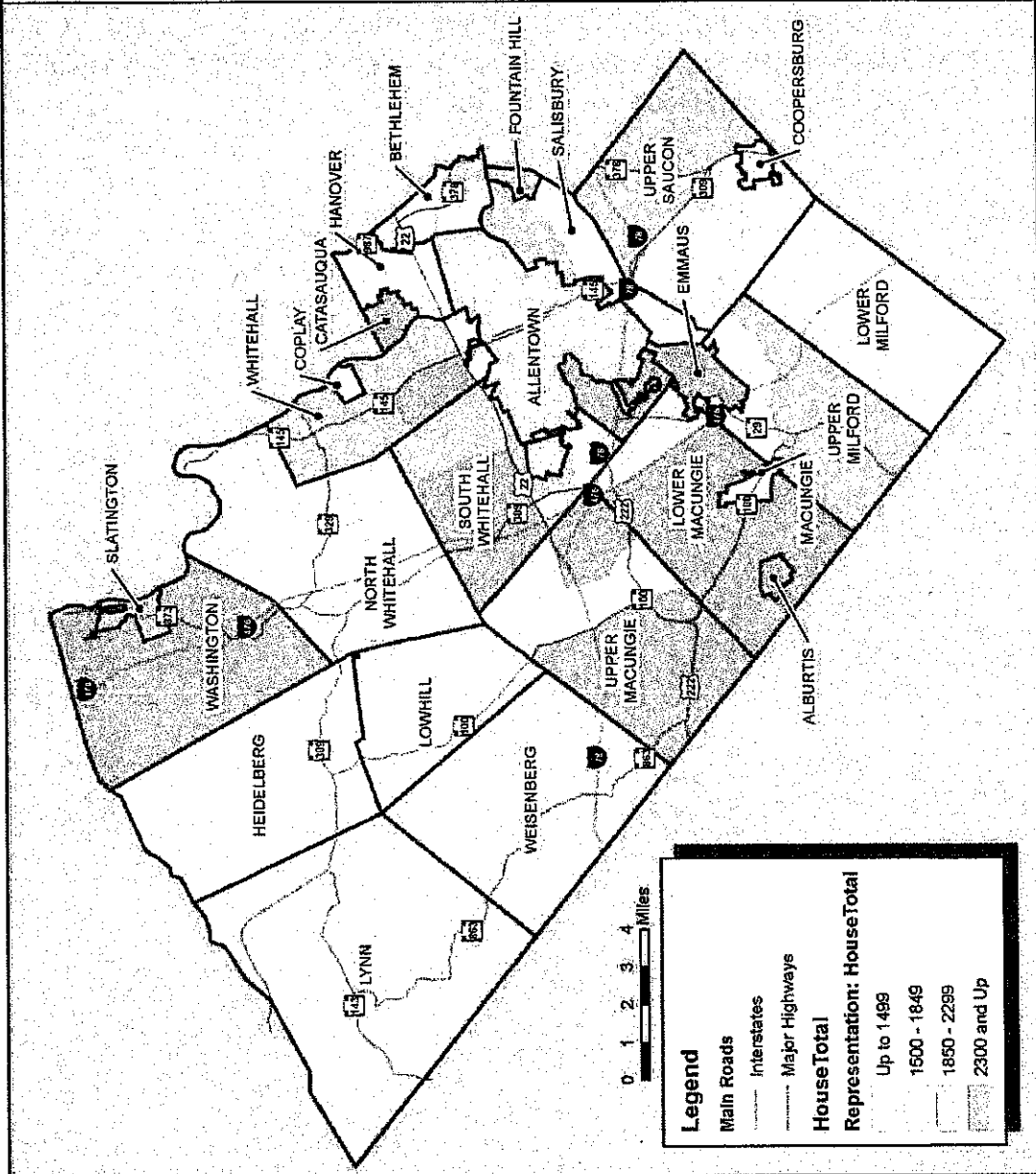
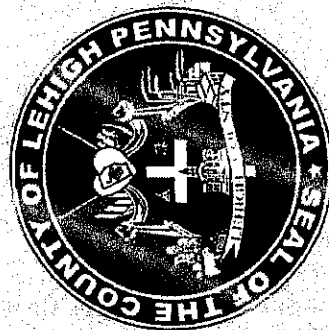


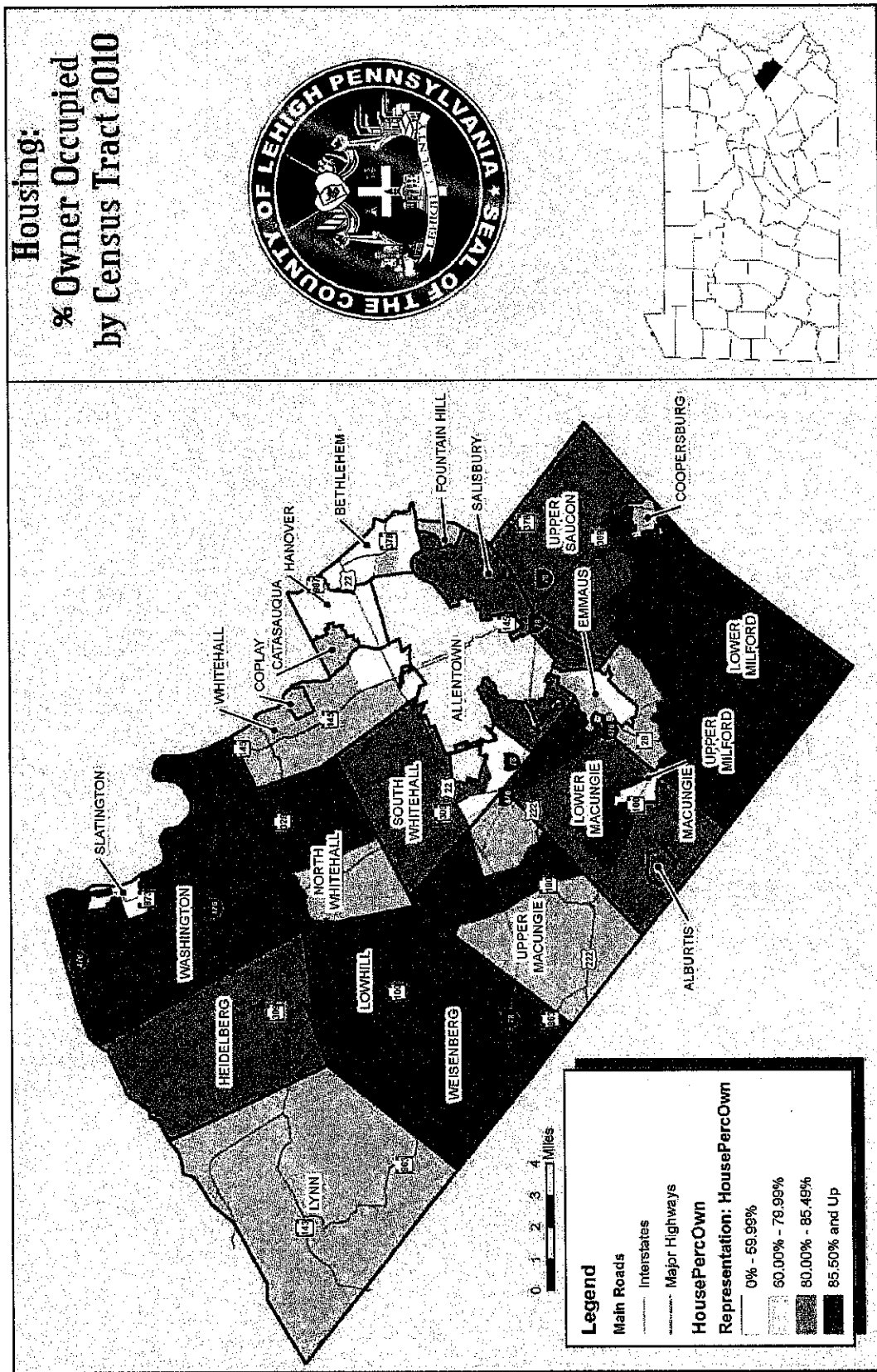
occupied housing units. Not surprisingly, the greatest number of housing units are located in the more populated areas of the County; these include the areas surrounding the City of Allentown, as well as the northern corner around Slatington Borough.

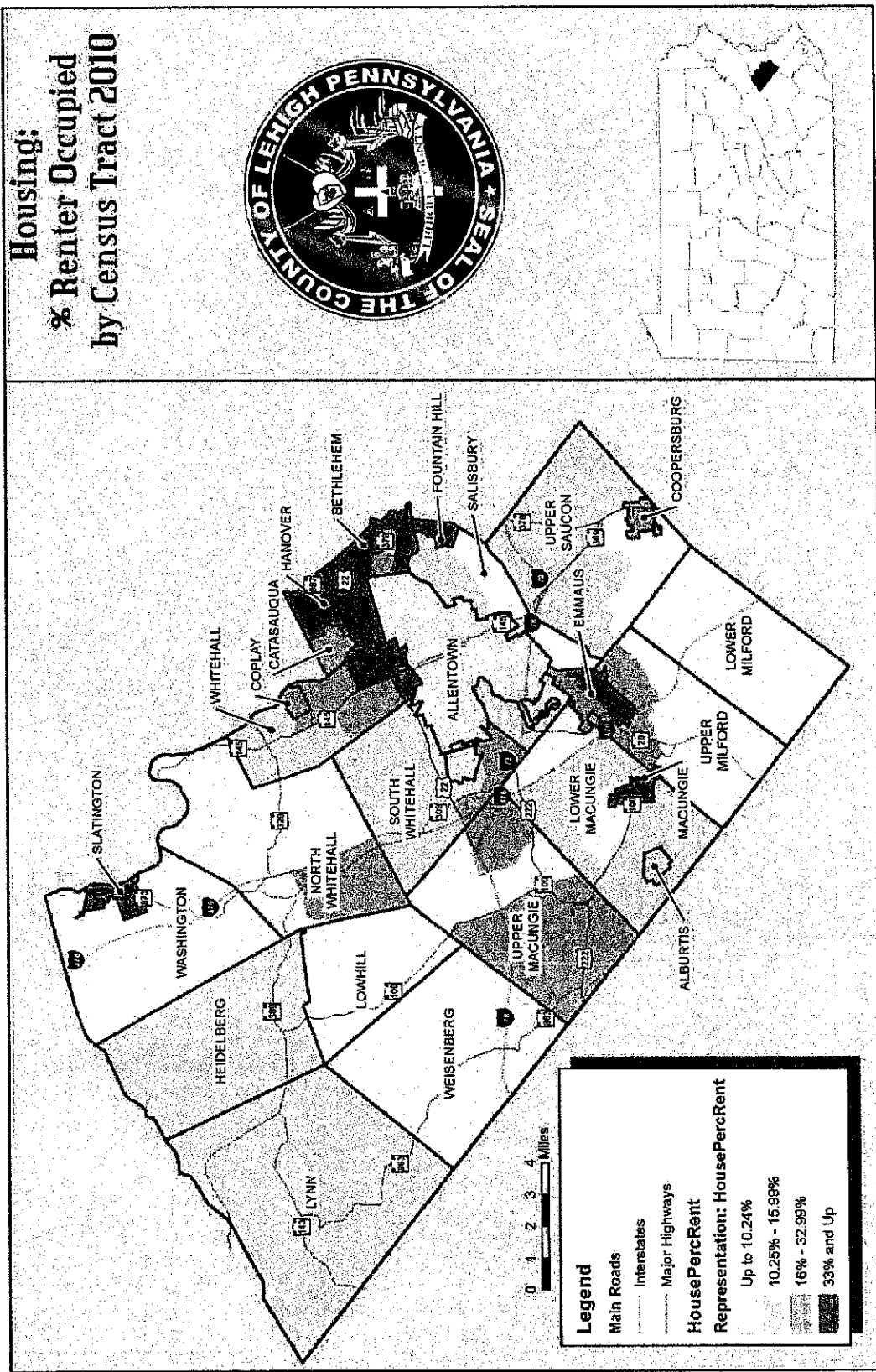
The areas with greater concentrations of owner-occupied housing are scattered across the County, including the areas of Weisenberg Township, Washington Township, Macungie Borough, and Emmaus Borough. The areas with the greatest concentrations of renter-occupied housing are those adjacent to the City of Allentown (Fountain Hill Borough, Catasauqua Borough, Coplay Borough), as well as Upper Macungie Township, Whitehall Township, and Coopersburg Borough.



Housing: Total Units by Census Tract 2010









The following table compares homeowners and renters by race and ethnicity in Lehigh County (excluding the City of Allentown). This table shows that "White" households represented the vast majority (97.4%) of owner-occupied households in 2000, with Asian households and Black or African-American households comprising just 1.1% and 0.4% of total homeowners, respectively. However, the percentage share of White households decreased to 94.4% of all homeownership tenures in 2010, with Asian households and Black or African-American households comprising just 2.3% and 1.5% of total homeowners, respectively. Minority populations were slightly more represented in the rental housing market. In 2010, White households made up 85.9% of all renter-occupied households, with Black or African-American households and Asian households comprising 5.3% and 3.0%, respectively.

Table II-5 - Household Tenure by Race and Ethnicity in Lehigh County, PA

Cohort	2000 U.S. Census		2010 U.S. Census	
	Owner (77.1%)	Renter (22.9%)	Owner (76.9%)	Renter (23.1%)
Total Households	61,610	18,264	70,116	21,063
Householder who is White alone	60,035	16,613	66,163	18,096
Householder who is Black or African American alone	277	469	1,056	1,107
Householder who is American Indian and Alaska Native alone	40	29	69	59
Householder who is Asian alone	694	535	1,640	624
Householder who is Native Hawaiian and Other Pacific Islander alone	8	16	11	9
Householder who is some other race alone	278	385	675	832
Householder who is two or more races	278	217	502	336

Source: 2000 U.S. Census & 2010 U.S. Census

The results of the 2010 U.S. Census indicate a slight decrease in the rate of homeownership in the County from 77.1% in 2000 (61,565 households) to

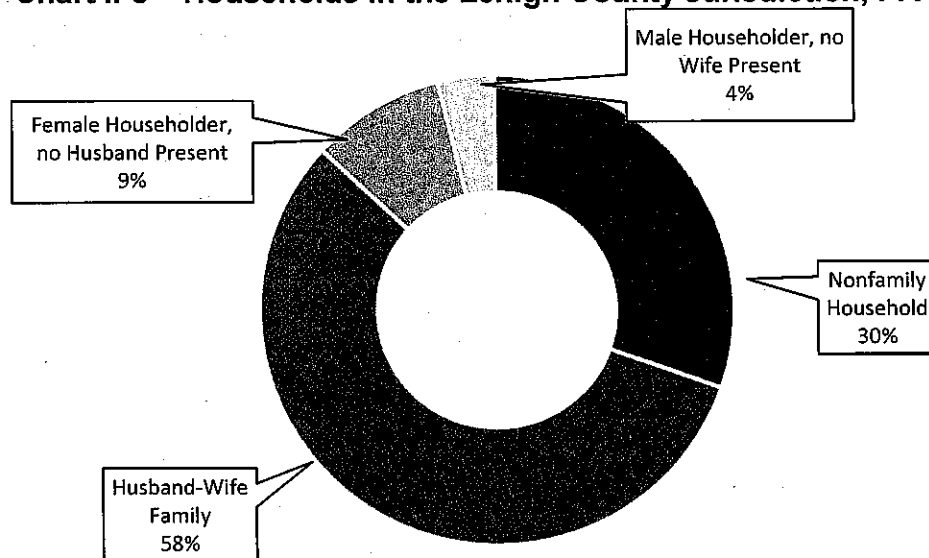


76.9% in 2010 (70,116 households). Of all homeowners in the County in 2010, the vast majority (94.4%) are White, which is a decrease from 97.4% in 2000. The share of African American homeownership **increased** from 0.4% to 1.5% of County households, and African American renters also increased, from 2.6% (469 households) to 5.3% (1,107 households) of renter households.

Families

In 2000, families comprised 71.3% of households in the County; of which 44.1% included children less than 18 years of age. The 2010 Census reports that the percentage of families in the County decreased slightly to 69.6% of all households in the County; of which 44.7% have children under the age of eighteen (18). Approximately 8.1% of families were female-headed households at the time of the 2000 U.S. Census, while 13.2% of family households were female-headed in 2010. The following chart illustrates the breakdown of households by type in Lehigh County (excluding the City of Allentown) at the time of the 2010 U.S. Census.

Chart II-8 – Households in the Lehigh County Jurisdiction, PA



Source: 2010 U.S. Census

In 2000, 71.3% of all households in the County were family households, leaving 28.7% as non-family households. The 2010 U.S. Census reports that 69.6% of all households in Lehigh County (excluding the City of Allentown)



are family households, and 30.4% are non-family households. A non-family household is a householder living alone or with non-relatives only.

C. Income and Poverty

The median household income for Lehigh County was \$43,449, compared to \$40,106 for the Commonwealth of Pennsylvania at the time of the 2000 U.S. Census. However, median household income is only available on the county level and thus includes the City of Allentown. The 2012-2016 American Community Survey estimates that the median household income increased 32.8% to \$57,685 in Lehigh County and to \$54,895 in the Commonwealth of Pennsylvania. The following table compares the distribution of household income according to the 2000 U.S. Census and the 2012-2016 American Community Survey. Between 2000 and 2016, there was a decrease in the number and percentage of all income groups earning less than \$75,000 per year.

Table II-6 - Household Income in Lehigh County, PA

Items	2000 U.S. Census		2012-2016 American Community Survey	
	Number of Households	Percentage	Number of Households	Percentage
Total Households	79,896	-	93,889	-
Less than \$10,000	3,813	4.8%	3,168	3.4%
\$10,000 to \$14,999	3,856	4.8%	3,078	3.3%
\$15,000 to \$24,999	8,445	10.6%	7,295	7.8%
\$25,000 to \$34,999	9,185	11.5%	7,317	7.8%
\$35,000 to \$49,999	13,320	16.7%	12,329	13.1%
\$50,000 to \$74,999	18,337	23.0%	18,215	19.4%
\$75,000 to \$99,999	10,466	13.1%	13,721	14.6%
\$100,000 to \$149,999	8,319	10.4%	16,397	17.5%
\$150,000 to \$199,999	2,260	2.8%	6,639	7.1%
\$200,000 or more	1,895	2.4%	5,730	6.1%

Source: 2000 U.S. Census & 2012-2016 American Community Survey



The following Table II-7 identifies the Section 8 Income Limits for Lehigh County based on household size. As Lehigh County is part of the Allentown-Bethlehem-Easton PA-NJ HUD Metro FMR Area, the same information applies for both the County and the Metro FMR Area as a whole. The Median Income for a family of four (4) in Lehigh County/Allentown-Bethlehem-Easton PA-NJ MSA was \$74,600 in 2018.

**Table II-7 – Lehigh County, PA-NJ MSA
Section 8 Income Limits for FY 2018**

Income Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low (30%) Income Limits	\$15,700	\$17,950	\$20,780	\$25,100	\$29,420	\$33,740	\$38,060	\$42,380
Very Low (50%) Income Limits	\$26,150	\$29,850	\$33,600	\$37,300	\$40,300	\$43,300	\$46,300	\$49,250
Low (80%) Income Limits	\$41,800	\$47,800	\$53,750	\$59,700	\$64,500	\$69,300	\$74,050	\$78,850

Source: HUD Section 8 Income Limits

The following Table II-8 highlights the current low- and moderate-income population in Lehigh County. The block groups that have a population of more than 51% low- and moderate-income are highlighted in the following table. Lehigh County (excluding the City of Allentown) has an overall low- and moderate-income population of 28.3%.



**Table II-8 - Low- and Moderate-Income
Population for the Lehigh County Jurisdiction, PA**

CDBGNAME	TRACT	BLKGRP	LOWMOD	LOWMODUNIV	LOWMODPCT
Lehigh County	001900	1	850	1590	53.5%
Lehigh County	005100	1	450	1190	37.8%
Lehigh County	005100	2	685	1440	47.6%
Lehigh County	005100	3	475	730	65.1%
Lehigh County	005100	4	495	925	53.5%
Lehigh County	005200	1	380	1155	32.9%
Lehigh County	005200	2	80	950	8.4%
Lehigh County	005200	3	345	775	44.5%
Lehigh County	005200	4	225	1735	13.0%
Lehigh County	005200	5	325	845	38.5%
Lehigh County	005200	6	455	1175	38.7%
Lehigh County	005301	1	245	1090	22.5%
Lehigh County	005301	2	315	985	32.0%
Lehigh County	005301	3	270	1330	20.3%
Lehigh County	005302	1	500	1535	32.6%
Lehigh County	005302	2	425	1485	28.6%
Lehigh County	005302	3	165	1150	14.3%
Lehigh County	005401	1	155	975	15.9%
Lehigh County	005401	2	270	1205	22.4%
Lehigh County	005402	1	375	1720	21.8%
Lehigh County	005402	2	660	3080	21.4%
Lehigh County	005503	1	110	1130	9.7%
Lehigh County	005503	2	440	3110	14.1%
Lehigh County	005504	1	355	1515	23.4%
Lehigh County	005504	2	510	1555	32.8%
Lehigh County	005504	3	410	1575	26.0%
Lehigh County	005505	1	60	1600	3.8%
Lehigh County	005505	2	650	1720	37.8%
Lehigh County	005506	1	350	1455	24.1%
Lehigh County	005506	2	435	1835	23.7%
Lehigh County	005601	1	720	1665	43.2%
Lehigh County	005601	2	65	540	12.0%
Lehigh County	005601	3	300	985	30.5%
Lehigh County	005601	4	435	1700	25.6%



2018 Analysis of Impediments to Fair Housing

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Lehigh County	005602	1	345	975	35.4%
Lehigh County	005602	2	460	1760	26.1%
Lehigh County	005602	3	260	700	37.1%
Lehigh County	005602	4	725	1670	43.4%
Lehigh County	005702	1	1065	2160	49.3%
Lehigh County	005702	2	585	925	63.2%
Lehigh County	005702	3	695	1310	53.1%
Lehigh County	005703	1	295	875	33.7%
Lehigh County	005703	2	350	910	38.5%
Lehigh County	005703	3	940	1580	59.5%
Lehigh County	005704	1	1175	2050	57.3%
Lehigh County	005704	2	515	1185	43.5%
Lehigh County	005705	1	300	1125	26.7%
Lehigh County	005705	2	405	1605	25.2%
Lehigh County	005705	3	705	2700	26.1%
Lehigh County	005800	1	855	1380	62.0%
Lehigh County	005800	2	295	1225	24.1%
Lehigh County	005800	3	320	635	50.4%
Lehigh County	005901	1	325	2005	16.2%
Lehigh County	005901	2	700	1805	38.8%
Lehigh County	005901	3	275	665	41.4%
Lehigh County	005901	4	685	1010	67.8%
Lehigh County	005901	5	635	985	64.5%
Lehigh County	005902	1	665	1575	42.2%
Lehigh County	006001	1	130	975	13.3%
Lehigh County	006001	2	720	1205	59.8%
Lehigh County	006001	3	435	975	44.6%
Lehigh County	006001	4	215	800	26.9%
Lehigh County	006001	5	255	615	41.5%
Lehigh County	006002	1	445	2075	21.4%
Lehigh County	006002	2	195	1090	17.9%
Lehigh County	006002	3	300	2255	13.3%
Lehigh County	006101	1	505	975	51.8%
Lehigh County	006101	2	240	950	25.3%
Lehigh County	006101	3	585	1250	46.8%
Lehigh County	006102	1	255	805	31.7%
Lehigh County	006102	2	195	670	29.1%



2018 Analysis of Impediments to Fair Housing

Background Data



Lehigh County	006102	3	180	715	25.2%
Lehigh County	006102	4	660	1840	35.9%
Lehigh County	006102	5	310	1240	25.0%
Lehigh County	006202	1	195	2215	8.8%
Lehigh County	006202	2	280	625	44.8%
Lehigh County	006202	3	1345	3305	40.7%
Lehigh County	006202	4	115	1015	11.3%
Lehigh County	006203	1	105	1820	5.8%
Lehigh County	006203	2	320	3215	10.0%
Lehigh County	006203	3	590	2500	23.6%
Lehigh County	006204	1	420	3760	11.2%
Lehigh County	006204	2	90	435	20.7%
Lehigh County	006302	1	540	2240	24.1%
Lehigh County	006302	2	355	2290	15.5%
Lehigh County	006302	3	230	1550	14.8%
Lehigh County	006303	1	605	1560	38.8%
Lehigh County	006303	2	65	550	11.8%
Lehigh County	006303	3	395	975	40.5%
Lehigh County	006304	1	135	680	19.9%
Lehigh County	006304	2	155	1275	12.2%
Lehigh County	006304	3	290	1755	16.5%
Lehigh County	006305	1	225	1085	20.7%
Lehigh County	006305	2	605	2565	23.6%
Lehigh County	006305	3	575	2310	24.9%
Lehigh County	006307	1	545	3205	17.0%
Lehigh County	006307	2	380	1830	20.8%
Lehigh County	006307	3	950	3100	30.6%
Lehigh County	006308	1	510	2650	19.2%
Lehigh County	006308	2	585	4115	14.2%
Lehigh County	006401	1	940	2925	32.1%
Lehigh County	006402	1	180	710	25.4%
Lehigh County	006402	2	400	1415	28.3%
Lehigh County	006402	3	910	2525	36.0%
Lehigh County	006500	1	180	700	25.7%
Lehigh County	006500	2	650	1300	50.0%
Lehigh County	006500	3	625	1305	47.9%
Lehigh County	006500	4	510	1380	37.0%



2018 Analysis of Impediments to Fair Housing

Background Data



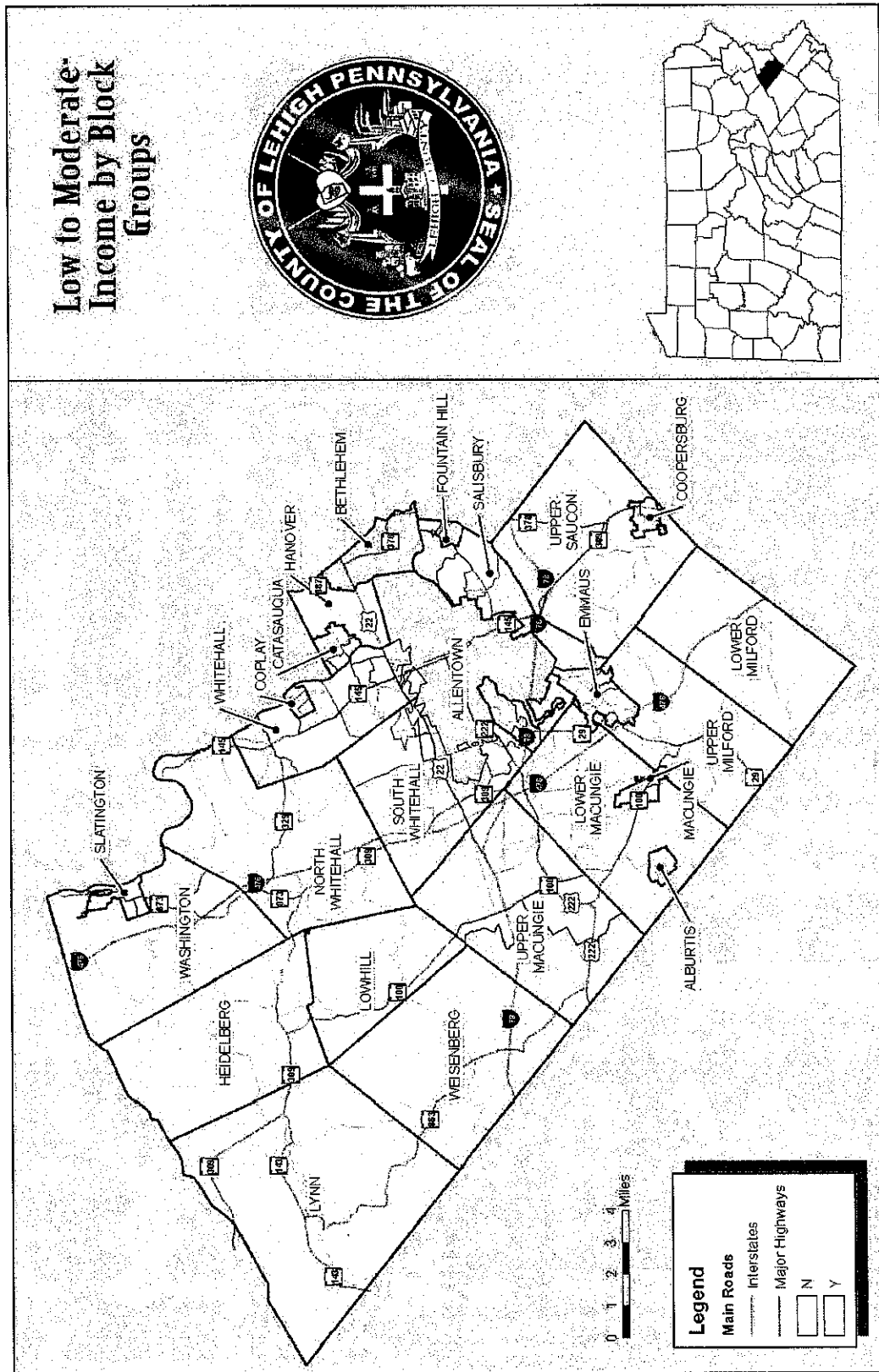
Lehigh County	006500	5	225	1030	21.8%
Lehigh County	006600	1	135	900	15.0%
Lehigh County	006600	2	135	650	20.8%
Lehigh County	006600	3	240	1340	17.9%
Lehigh County	006600	4	210	1055	19.9%
Lehigh County	006600	5	370	1260	29.4%
Lehigh County	006701	1	230	620	37.1%
Lehigh County	006701	2	345	860	40.1%
Lehigh County	006701	3	370	1345	27.5%
Lehigh County	006701	4	240	835	28.7%
Lehigh County	006701	5	395	1015	38.9%
Lehigh County	006702	1	440	1685	26.1%
Lehigh County	006702	2	435	1115	39.0%
Lehigh County	006703	1	35	1295	2.7%
Lehigh County	006703	2	435	2260	19.2%
Lehigh County	006703	3	425	970	43.8%
Lehigh County	006703	4	340	1345	25.3%
Lehigh County	006800	1	640	910	70.3%
Lehigh County	006800	2	400	1115	35.9%
Lehigh County	006800	3	415	1270	32.7%
Lehigh County	006800	4	745	1140	65.4%
Lehigh County	006902	1	380	1475	25.8%
Lehigh County	006902	2	345	785	43.9%
Lehigh County	006903	1	600	2640	22.7%
Lehigh County	006903	2	185	1110	16.7%
Lehigh County	006903	3	260	1255	20.7%
Lehigh County	006905	1	265	1890	14.0%
Lehigh County	006905	2	75	860	8.7%
Lehigh County	006905	3	125	1075	11.6%
Lehigh County	006906	1	360	2180	16.5%
Lehigh County	006906	2	285	1445	19.7%
Total:			57,270	202,315	28.3%

Source: HUD Exchange

The following map illustrates areas of Lehigh County with concentrations of low- and moderate-income residents. These Census Block Groups that are above 51% low- and moderate-income include the areas of Slatington



Borough, Upper Macungie Township, Salisbury Township, and portions of
Coopersburg Borough and South Whitehall Township.

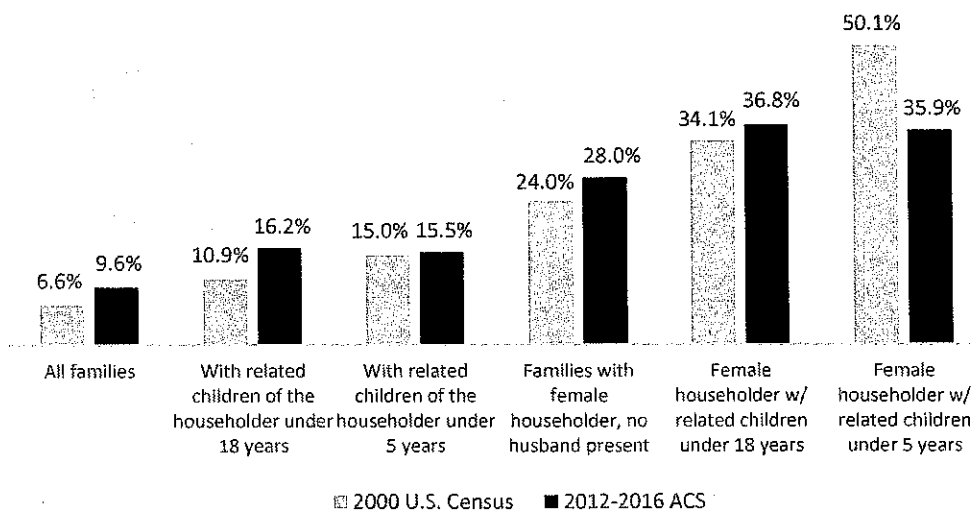




Poverty levels are only available on the county level, which means the following data and chart include the City of Allentown in its calculations.

In Lehigh County, the percentage of all families living in poverty experienced an increase from 6.6% in 2000 to 9.6% in 2016, as well as the percentage of female headed households living in poverty, rose from 24.0% in 2000 to 28.0% according to the 2012-2016 American Community Survey estimates. The percentage of female-headed householders with no husband present and with children under 18 years in poverty was 34.1% in 2000 and increased to 36.8% in 2016. However, the percentage of female-headed households with no husband present and with children under 5 years old in poverty decreased substantially, from 50.1% in 2000 to 35.9% in 2016. The County's poverty statistics for families with children are highlighted in the following chart.

Chart II-9 – Percentage of Families and Female-Headed Households in Poverty in Lehigh County, PA



Source: 2000 U.S. Census & 2012-2016 American Community Survey

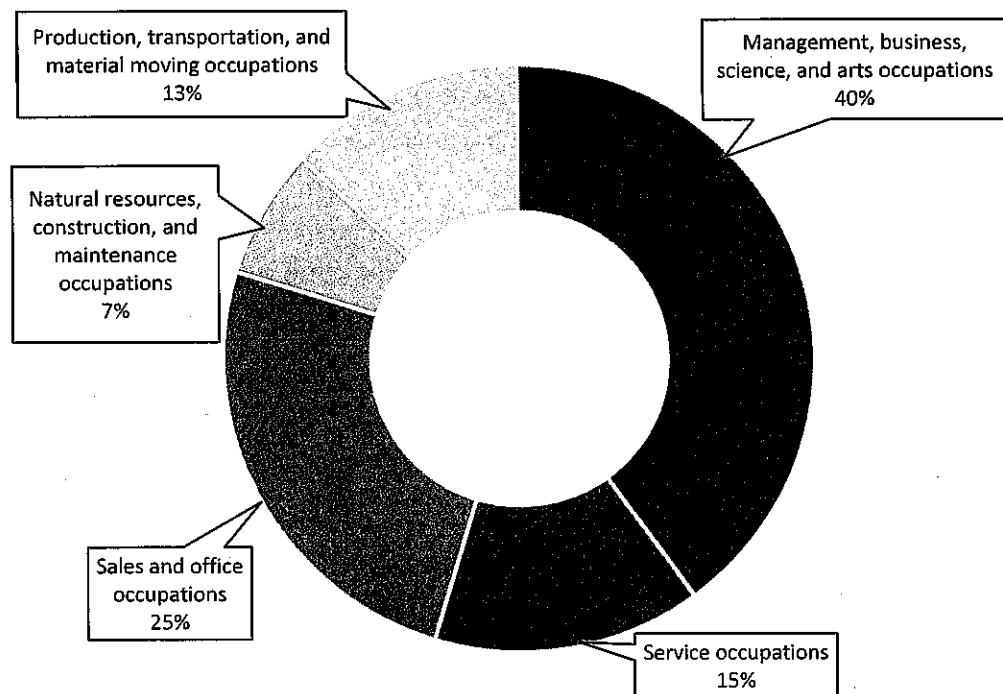
D. Employment

In 2000, 66.2% of the County's residents (excluding the City of Allentown) 16 years of age and over were considered as a part of the labor force. The 2012-2016 American Community Survey estimates that approximately



66.8% of the population is currently in the labor force. The following charts illustrate the categories of workers and their occupations. The largest portion of Lehigh County (excluding the City of Allentown) workers (40.0%) is in management, business, science, and the arts occupations; followed by sales and office occupations (25.1%). Approximately 14.7% of all workers are in “service occupations.”

Chart II-10 – Occupations in Lehigh County, PA



Source: 2012-2016 American Community Survey

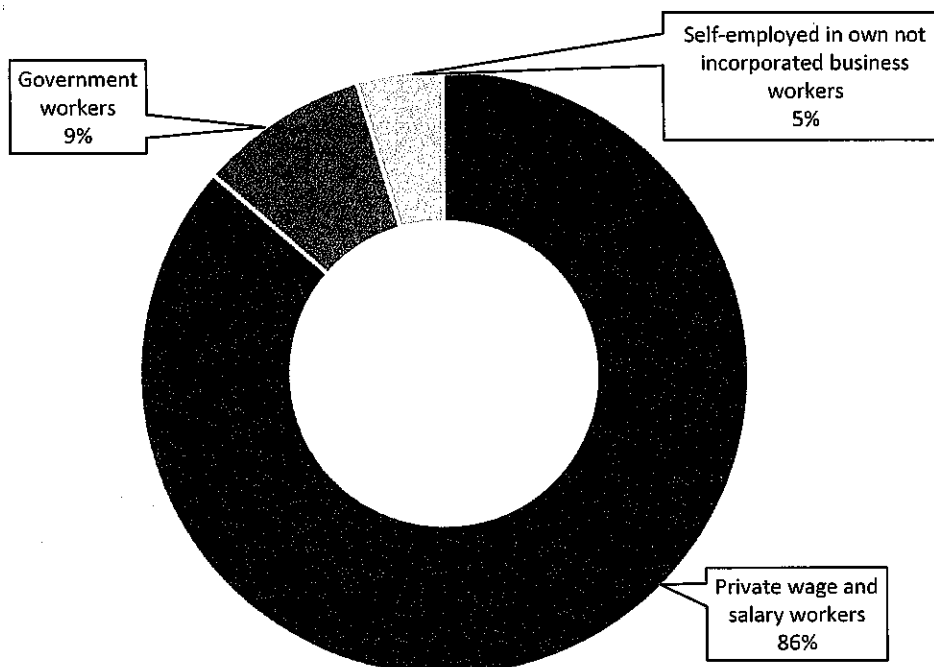
These percentages differ slightly when compared to 2000 Census data.

- Natural resources, construction, and maintenance occupations slightly decreased, from 8.1% in 2000 to 7.1% in 2016.
- Sales and office occupations decreased from 27.2% of the workforce in 2000 to 25.1% in 2016.
- Production, transportation, and material moving occupations decreased from 14.9% in 2000 to 13.1% in 2016.
- Service occupations increased slightly, from 12.2% of all occupations in 2000 to 14.7% in 2016.



- Management, business, science, and arts occupations increased from 37.4% in 2000 to 40.0% in 2016.

Chart II-11 – Worker Class in the Lehigh County Jurisdiction, PA



Source: 2012-2016 American Community Survey

This data is slightly different than the respective 2000 Census data, although there was less variance than the occupational data in the previous chart.

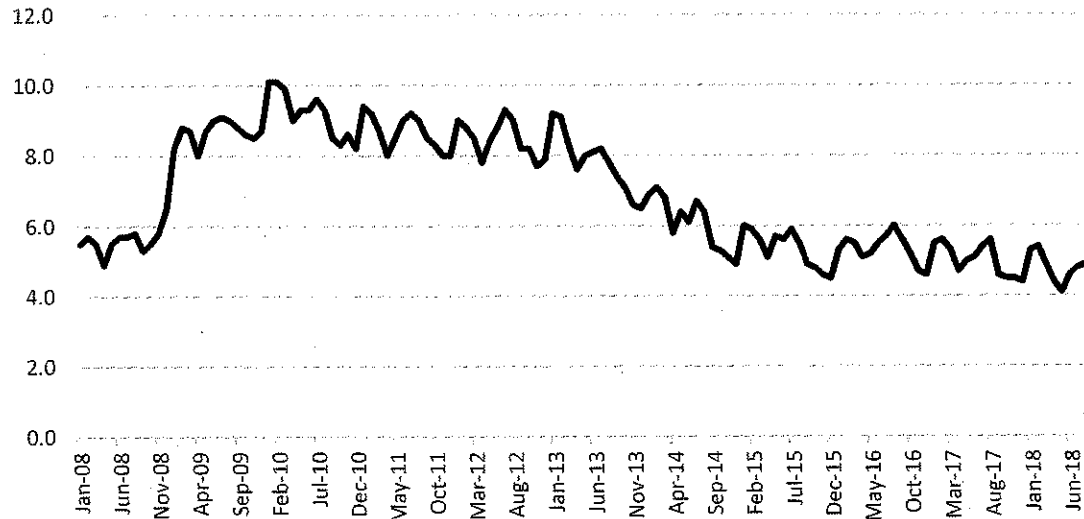
- Private wage and salary workers increased from 85.7% of workers in 2000 to 86.3% in 2016.
- Government workers slightly increased from 8.2% of workers in 2000 to 9.1% in 2016.
- Unpaid family workers decreased from 0.2% in 2000 to 0.1% in 2016.
- Self-employed in own not incorporated business workers decreased from 5.9% of workers in 2000 to 4.5% in 2016.

The following chart illustrates the trends of the unemployment rate for Lehigh County from January 2008 through August 2018 as reported by the Bureau



of Labor Statistics (www.bls.gov). This data includes the unemployment data for the City of Allentown.

Chart II-12 – Unemployment Rate - Lehigh County, PA



Source: <http://data.bls.gov>

The unemployment rate in Lehigh County fluctuated from early 2008 through mid-2013, and then decreased until mid-2015, where it has fluctuated between 4 to 5%. The local unemployment rate at this time has stayed fairly consistent with the National Unemployment Rate. While the National Unemployment Rate has decreased steadily since 2010 and was at 3.7% as of October of 2018, Lehigh County has remained slightly higher, with an unemployment of 4.2. However, this data includes the City of Allentown, which has shown a higher unemployment rate in recent years.

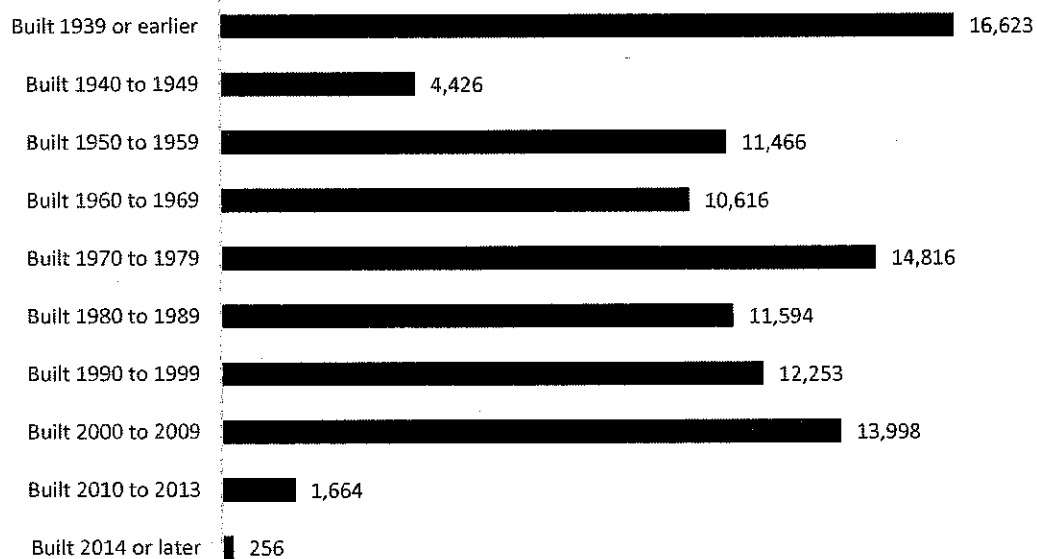
E. Housing Profile

Less than half (44.1%) of the County's housing stock (excluding the City of Allentown) was built prior to 1970, which coincides with the County's continued population growth. While the County's housing stock is fairly new, only 1.5% of its housing stock was built after 2009. The County's housing stock is much newer than that of the City of Allentown; approximately 37.9%



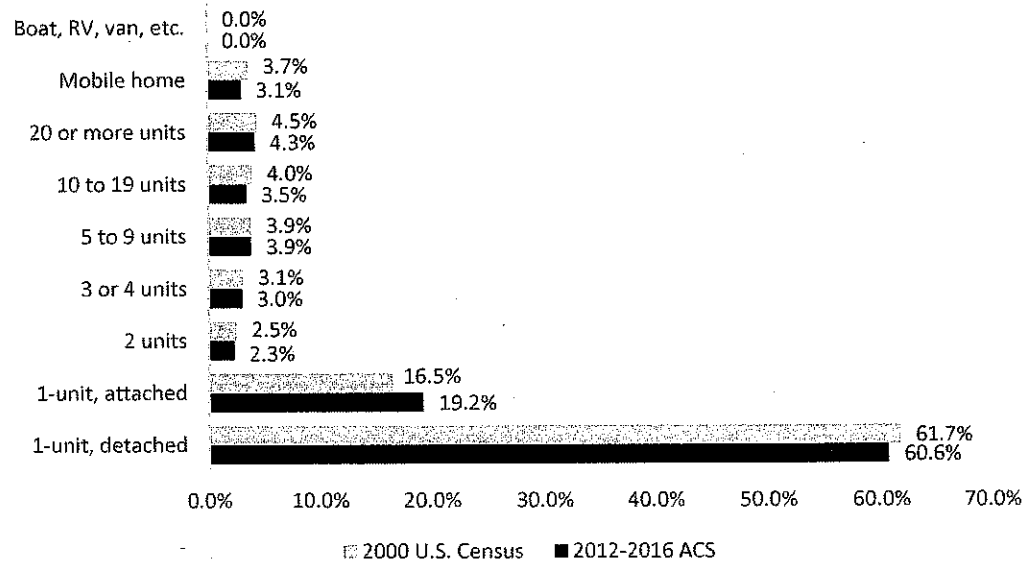
of the City's housing stock was built prior to 1939 and almost three-quarters (73.6%) was built prior to 1970. The following chart illustrates the year that housing structures were built in Lehigh County based on the 2012-2016 American Community Survey.

Chart II-13 – Year Structure Built in the Lehigh County Jurisdiction, PA



Source: 2012-2016 American Community Survey
Total = 97,712 Structures

The following Chart II-14 outlines the type of the housing stock in Lehigh County (excluding the City of Allentown) at the time of 2000 U.S. Census and the 2012-2016 American Community Survey.

**Chart II-14 – Housing Stock in Lehigh County, PA**

Source: 2000 U.S. Census & 2012-2016 American Community Survey

As shown in the previous chart, there were some minor shifts in the percentage breakdowns of the housing stock in Lehigh County between 2000 and 2016, but single-unit detached houses remain the most prevalent by a wide margin. The number of 1-unit attached homes increased, while the number of 1-unit detached showed a slight decrease. All other housing types stayed fairly consistent or has a slight change in their prevalence.

Median value of owner-occupied homes is available on a county level, which would also include the City of Allentown data. The median value of owner-occupied homes in Lehigh County in 2000 was \$113,600 compared to \$87,000 for the Commonwealth of Pennsylvania. The 2012-2016 American Community Survey estimates that the median value of owner-occupied homes in Lehigh County increased to approximately \$192,300 (169.3% of median value in 2000), as compared to \$163,200 (187.6% of median value in 2000) in the Commonwealth of Pennsylvania. The latest available data from real estate listings presented a similar value of home values in the County; according to RealtyTrac, the median list price of a home in Lehigh County was \$198,000 in September of 2018.

The following table outlines the number of new units for which building permits were filed annually for the Allentown-Bethlehem-Easton PA-NJ Core



Base Statistical Area (CBSA). The Allentown-Bethlehem-Easton PA- NJ CBSA has seen a substantial decrease in the total number of new units constructed since 2003, although it has remained constant since 2008.

**Table II-9 - Units Authorized by Building Permits –
Allentown-Bethlehem-Easton PA-NJ CBSA**

Year	Single Family	Multi Family	Total
2003	3,999	377	4,376
2004	4,461	151	4,612
2005	4,319	529	4,848
2006	3,860	284	4,144
2007	2,640	149	2,789
2008	1,508	186	1,694
2009	1,401	247	1,648
2010	1,177	211	1,388
2011	1,059	74	1,133
2012	829	240	1,069
2013	1,139	211	1,350
2014	1,051	750	1,801
2015	943	413	1,356
2016	1,059	204	1,263
2017	938	180	1,118

Source: <http://socds.huduser.org/permits/summary.odp>

F. Financing

Owner Occupied Housing Costs

The median monthly mortgage expense in Lehigh County (including the City of Allentown) for 2000 was \$1,095. The 2012-2016 American Community



Survey estimates that the median monthly owner occupied housing costs, (utilities, homeowners' insurance, and mortgage payments) increased to \$1,572. Monthly owner costs increased 43.6% while median income during the same time period increased at a lesser rate of 32.8%. The following table illustrates mortgage status and selected monthly owner costs of the Lehigh County (excluding the City of Allentown) according to the 2000 U.S. Census and the 2012-2016 American Community Survey. More than two-thirds (65.5%) of all owner-occupied houses in 2016 had mortgages. Between the 2000 census count and the 2016 estimate, there is a slight overall trend of increased monthly housing costs (while taking into account inflation).

**Table II-10 - Mortgage Status and Selected
Monthly Owner Costs in Lehigh County, PA**

Monthly Owner Cost	2000 U.S. Census		2012-2016 American Community Survey	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Houses with a mortgage	36,744	67.5%	46,112	65.5%
Less than \$500	832	2.3%	461	1.0%
\$500 to \$999	11,320	30.8%	4,286	10.5%
\$1,000 to \$1,499	14,466	39.4%	12,993	28.2%
\$1,500 to \$1,999	6,353	17.3%	12,641	27.4%
\$2,000 or more	3,773	10.3%	15,191	32.9%
Median (incl. Allentown)	\$1,095		\$1,572	
Houses without a mortgage	17,680	32.5%	24,298	34.5%
Median (incl. Allentown)	\$356		\$599	

Source: 2000 U.S. Census & 2012-2016 American Community Survey

As a result of rising monthly housing costs, 23.2% of all owner-occupied households with a mortgage exceeded 30% of their monthly income in 2000. This is a relatively high percentage of owners whose housing is not considered "affordable." The 2012-2016 American Community Survey estimates that the portion of homeowners with a mortgage whose housing costs exceed 30% of their monthly income had increased to approximately 27.4%. The following table illustrates housing costs for owner-households



according to the 2000 U.S. Census and the 2012-2016 American Community Survey.

Table II-11 - Selected Monthly Owner Occupied Housing Costs as a Percentage of Household Income in Lehigh County, PA

Owner Costs as a % of Income	2000 U.S. Census		2012-2016 American Community Survey	
	Number of Housing Units	Percentage of Total Units	Number of Housing Units	Percentage of Total Units
Housing units with a mortgage (excluding those whose monthly costs cannot be calculated)	36,744	67.5%	46,000	65.6%
Less than 20 percent	16,056	43.7%	19,258	41.9%
20 to 24.9 percent	7,428	20.2%	8,287	18.0%
25 to 29.9 percent	4,668	12.7%	5,854	12.7%
30 to 34.9 percent	2,840	7.7%	3,435	7.5%
35 percent or more	5,701	15.5%	9,166	19.9%
Not computed	51	0.1%	112	0.2%
Housing units without a mortgage (excluding those whose monthly costs cannot be calculated)	17,680	32.5%	24,112	34.4%
Less than 20 percent	13399	75.8%	16,380	67.9%
20 to 24.9 percent	1,230	7.0%	2,189	9.1%
25 to 29.9 percent	895	5.1%	1,372	5.7%
30 to 34.9 percent	632	3.6%	1,096	4.5%
35 percent or more	1,357	7.7%	3,075	12.8%
Not computed	167	0.9%	186	0.8%

Source: 2000 U.S. Census & 2012-2016 American Community Survey

The website www.Realtor.com shows that as of October of 2018, there were 1,463 properties for sale in Lehigh County. According to [Realtor.com](http://www.Realtor.com), Lehigh County properties had an average listing price of \$209,900 and a price per square foot of \$124/sq. ft.

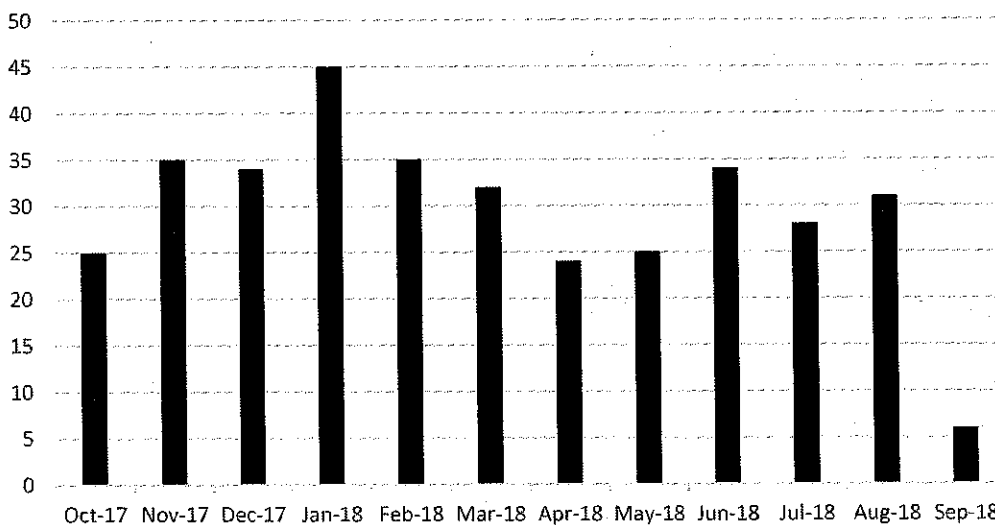


According to www.RealtyTrac.com, the median list price in Lehigh County in August of 2017 was \$200,000 compared to the median list price of \$190,000 in March, 2016.

Foreclosures

Per RealtyTrac, Lehigh County had 39 homes in foreclosure as of September of 2018, for a foreclosure rate of 1 in every 3,321 housing units. However, the City of Allentown accounted for 33 of these foreclosures, meaning the Lehigh County had just six (6) foreclosures in September of 2018. The following chart illustrates the monthly foreclosure filings in Lehigh County (excluding the City of Allentown) from October 2017 to September 2018.

Chart II-15 – Number of Foreclosures in Lehigh County, PA



Source: www.realtytrac.com

The number of foreclosures for Lehigh County was at its highest in January of 2018 with 45 foreclosures. While foreclosures can negatively impact a community, it offers a chance for the County and non-profit housing agencies to purchase homes and resell them to low-income households.



Renter Occupied Housing Costs

Average monthly rent is only available on the county level, which means it includes the City of Allentown. The median monthly rent in Lehigh County was \$586 in 2000 and it jumped to \$955 per month in 2016. However, the following table illustrates rental rates within Lehigh County at the time of the 2000 U.S. Census and the 2012-2016 American Community Survey and excludes the City of Allentown.

Table II-12 - Gross Monthly Rent in All of Lehigh County, PA

Rental Rates	2000 U.S. Census		2012-2016 American Community Survey	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Less than \$500	4,309	24.0%	1,984	8.5%
\$500 to \$999	11,679	65.1%	8,630	36.8%
\$1,000 to \$1,499	861	4.8%	8,213	35.0%
\$1,500 or more	369	2.1%	3,398	14.5%
No cash rent	723	4.0%	1,254	5.3%
Median (incl. Allentown)	\$586	-	\$955	-

Source: 2000 U.S. Census Data & 2012-2016 American Community Survey

The monthly renter occupied housing costs for 33.3% of all renter-occupied households exceeded 30% of monthly income in 2000, indicating a high percentage of renters whose housing is not considered affordable. ACS estimates show that in 2016, the percentage of all renter-occupied households pay housing costs that exceed 30% of their income jumped to 44.0%. The following table illustrates the housing cost for renter-households in 2000 and also the data from the 2012-2016 American Community Survey. The increase in rental households whose rental cost exceeds thirty percent of their monthly income indicates the need for more affordable rental options in the County.



Table II-13 - Gross Rent as a Percentage of Household Income in the Lehigh County Jurisdiction, PA

Rental Cost as a % of Income	2000 U.S. Census		2012-2016 American Community Survey	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Less than 15 percent	3,471	19.3%	2,795	11.9%
15 to 19 percent	2,875	16.0%	2,943	12.5%
20 to 24 percent	2,688	15.0%	3,052	13.0%
25 to 29 percent	2,000	11.1%	2,883	12.3%
30 to 34 percent	1,249	7.0%	2,112	9.0%
35 percent or more	4,665	26.0%	8,222	35.0%
Not computed	993	5.5%	1,472	6.3%

Source: 2000 U.S. Census Data & 2012-2016 American Community Survey

The 2018 Fair Market Rents for Lehigh County, PA are the same as the Allentown-Bethlehem-Easton PA-NJ HUD Metro FMR Area and are shown in the following table.

Table II-14 - Final FY 2018 Fair Market Rents (FMRs) by Unit Bedrooms in Lehigh County, PA

	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Final FY 2018 FMR	\$668	\$824	\$1,048	\$1,352	\$1,427

Source: www.hud.gov FY 2018 Fair Market Rents

G. Household Types

Based on a comparison between the 2000 and 2016 data, Lehigh County experienced a 16.41% increase in population. The County (including the City of Allentown) median household income increased 32.76%. The median household income is substantially higher in the Lehigh County compared to the City of Allentown. While the County (including Allentown) had a median household income of \$57,685 in 2016, the City of Allentown had a median household income of just \$37,256, which likely reduces the County's average.

**Table II-15 – Changes Between 2000 & 2016**

Demographics	2000	2016	% Change
Population	205,458	239,168	+16.41%
Households	79,874	93,889	+17.55%
Household Median Income	\$43,449*	\$57,685*	+32.76%

**Including the City of Allentown, PA*

Data Source: 2000 Census (Base Year), 2012-2016 American Community Survey

Note:

According to the U.S. Census Bureau the following notes were issued in regard to the CHAS (Comprehensive Housing Affordability Strategy) and the discrepancies in adding up the totals in the following tables. As with the CHAS 2000 and all other special tabulations of Census data, the Census Bureau requires that the CHAS data be rounded. The rounding scheme is as follows: 0 remains 0; 1-7 rounds to 4; 8 or greater rounds to nearest multiple of 5. This causes discrepancies when adding up smaller geographies and when adding up data within CHAS tables. Consider a city where the CHAS data indicate that there were 4 renter households with extremely low income and 4 owner households with extremely low income. One might be tempted to conclude that there are 8 total households with extremely low income. If another CHAS table indicates that there are actually a total of 15 extremely low income households, that would appear to be contradictory. This situation is the result of rounding. The County could have 6 renter households with extremely low income and 7 owner households with extremely low income, which is a total of 13 extremely low income households; but all of these numbers would be rounded, to 4, 4, and 15.

Table II-16 – Number of Households Table

	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	>100% AMI
Total Households *	5,510	6,950	12,410	8,474	48,050
Small Family Households *	1,380	1,393	3,680	3,360	28,355
Large Family Households *	261	252	1,041	766	3,978
Household contains at least one person 62-74 years of age	1,308	1,697	2,811	2,156	9,263



	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	>100% AMI
Household contains at least one person age 75 or older	1,229	2,581	2,919	1,028	2,951
Households with one or more children 6 years old or younger *	799	571	1,668	1,360	5,220

Data Source: 2009-2013 CHAS

Of all households, more than half (59.0%) have a higher income than the HUD Area Median Income (AMI) for the Allentown-Bethlehem-Easton PA-NJ, MSA. This includes both small and large family households, though there are few large family households under 100% AMI. The remaining 61.0% of total households make less than the AMI, with the largest remaining group (15.0% of total households) being those making between 50-80% of AMI. Households making between 80-100%, 30-50%, and below 30% AMI comprise 10.4%, 8.5%, and 6.8% of all households, respectively. With 41% of all Lehigh County households making less than the HUD Area Median Income, including 6.8% making less than 30% AMI, there is a portion of the population without access to affordable housing. Households that make 30% of AMI have an annual income of \$22,380; as HUD defines affordable housing as paying no more than 30% of income on rent, this leaves low-income households with less than \$1,865 per month (without taking tax out) to spend on housing. As there are few housing options in Lehigh County available for families at this rental level, many households must then pay more than 30% of their income for housing, becoming cost-overburdened.

Table II-17 – Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	105	130	140	55	430	0	0	63	30	93



	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	40	15	0	0	55	4	0	0	0	4
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	35	39	79	20	173	0	65	100	8	173
Housing cost burden greater than 50% of income (and none of the above problems)	1,645	1,090	342	15	3,092	1,705	1,544	1,538	460	5,247
Housing cost burden greater than 30% of income (and none of the above problems)	349	846	1,713	389	3,297	359	1,251	2,430	1,919	5,959
Zero/negative Income (and none of the above problems)	266	0	0	0	266	277	0	0	0	277

Data Source: 2009-2013 CHAS

Table II-17 illustrates the discrepancies between homeowners and renters regarding housing problems. While there are more owner-occupied housing units than renter-occupied units (75.0% to 25.0%, respectively), renters face a much higher rate of housing problems.

**Table II-18 – Housing Problems (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)**

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	1,820	1,275	561	90	3,746	1,710	1,609	1,708	498	5,525
Having none of four housing problems	954	1,393	3,415	2,009	7,771	473	2,648	6,730	5,879	15,730
Household has negative income, but none of the other housing problems	266	0	0	0	266	277	0	0	0	277

Data Source: 2009-2013 CHAS

While more owners facing severe housing problems than renters, renters have a much higher rate.

Table II-19 – Cost Overburdened Greater Than 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	679	599	750	2,028	390	581	1,521	2,492
Large Related	72	43	125	240	129	156	493	778
Elderly	755	836	611	2,202	1,012	1,815	1,361	4,188
Other	594	627	698	1,919	497	286	643	1,426
Total need by income	2,100	2,105	2,184	6,389	2,028	2,838	4,018	8,884

Data Source: 2009-2013 CHAS



For those cost overburdened by more than 30%, renters are more likely to be highly affected; renter-occupied households are much likelier to be cost overburdened than owners.

Table II-20 – Cost Overburdened Greater Than 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	579	238	132	949	350	429	669	1,448
Large Related	68	29	0	97	129	107	242	478
Elderly	545	527	148	1,220	764	825	418	2,007
Other	530	368	69	967	442	204	232	878
Total need by income	1,722	1,162	349	3,233	1,685	1,565	1,561	4,811

Data Source: 2009-2013 CHAS

For those who are cost overburdened by more than 50%, renters making up are more highly affected than owners based on the total number of households.

Table II-21 – Overcrowding Conditions

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	75	54	79	20	228	0	55	85	4	144
Multiple, unrelated family households	0	0	0	0	0	4	10	15	4	33
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	75	54	79	20	228	4	65	100	8	177

Data Source: 2009-2013 CHAS

The following three (3) maps illustrate census tracts where there is overcrowding for Extremely Low, Very Low, and Low Income Households.



- Percentage Extremely Low Income Households with Overcrowding - Page 71
- Percentage Very Low Income Households with Overcrowding - Page 72
- Percentage Low Income Households with Overcrowding - Page 73

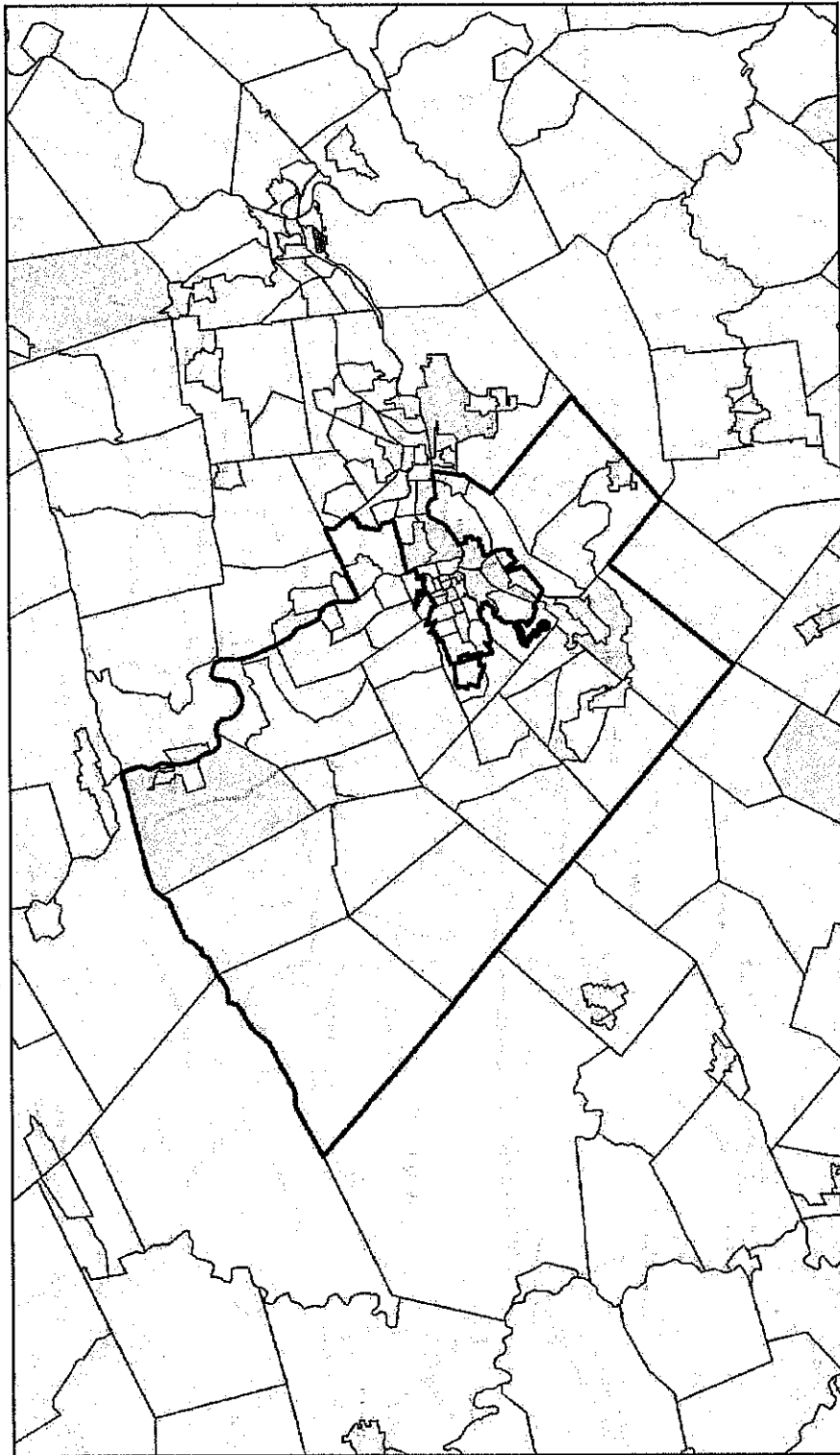


2018 Analysis of Impediments to Fair Housing

Background Data



% of Extremely Low Income Households with Overcrowding



October 18, 2018

Override 1 LIHWthOvercrowding

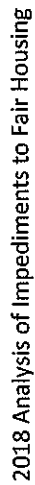
8.22-16.81%

T10_LE50_OC_PCT

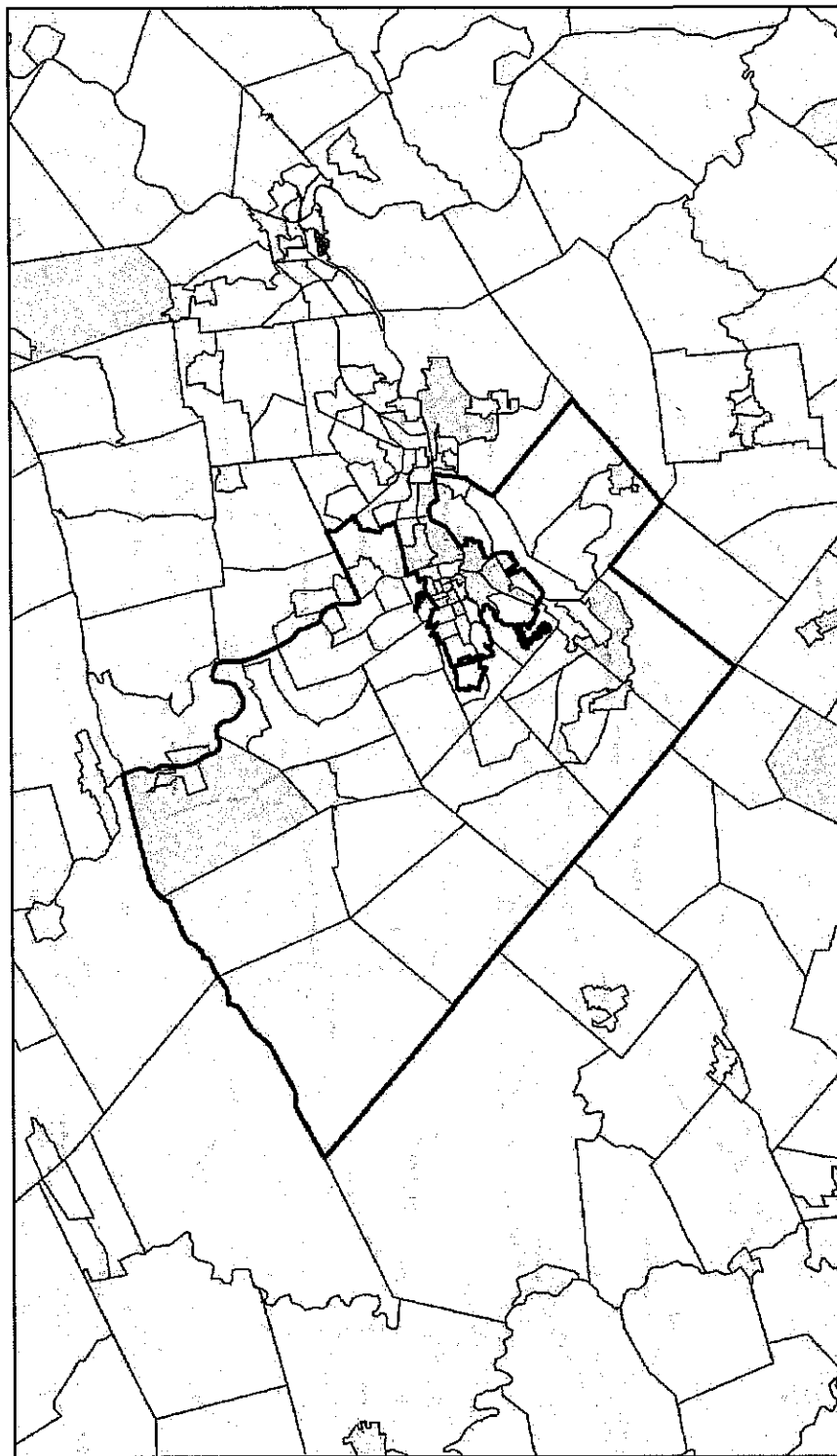
27.15-41.32%

0-8.22%

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community



% of Low Income Households with Overcrowding



October 18, 2018

Override 1 LIHHWithOvercrowding 8.22-16.81%

Variable	Mean	Std. Dev.	Minimum	Maximum
T10_LE50_OC_PCT	27.15	41.32%		

0-8.22%

0	3.5	1.426,572	14 ml
7			

Sources: Esri, HERE, Garmin, USGS, Intermap, increment P., NRC, Inc., Esri Japan, DE L, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, & OpenStreetMap contributors, and the GIS User Community

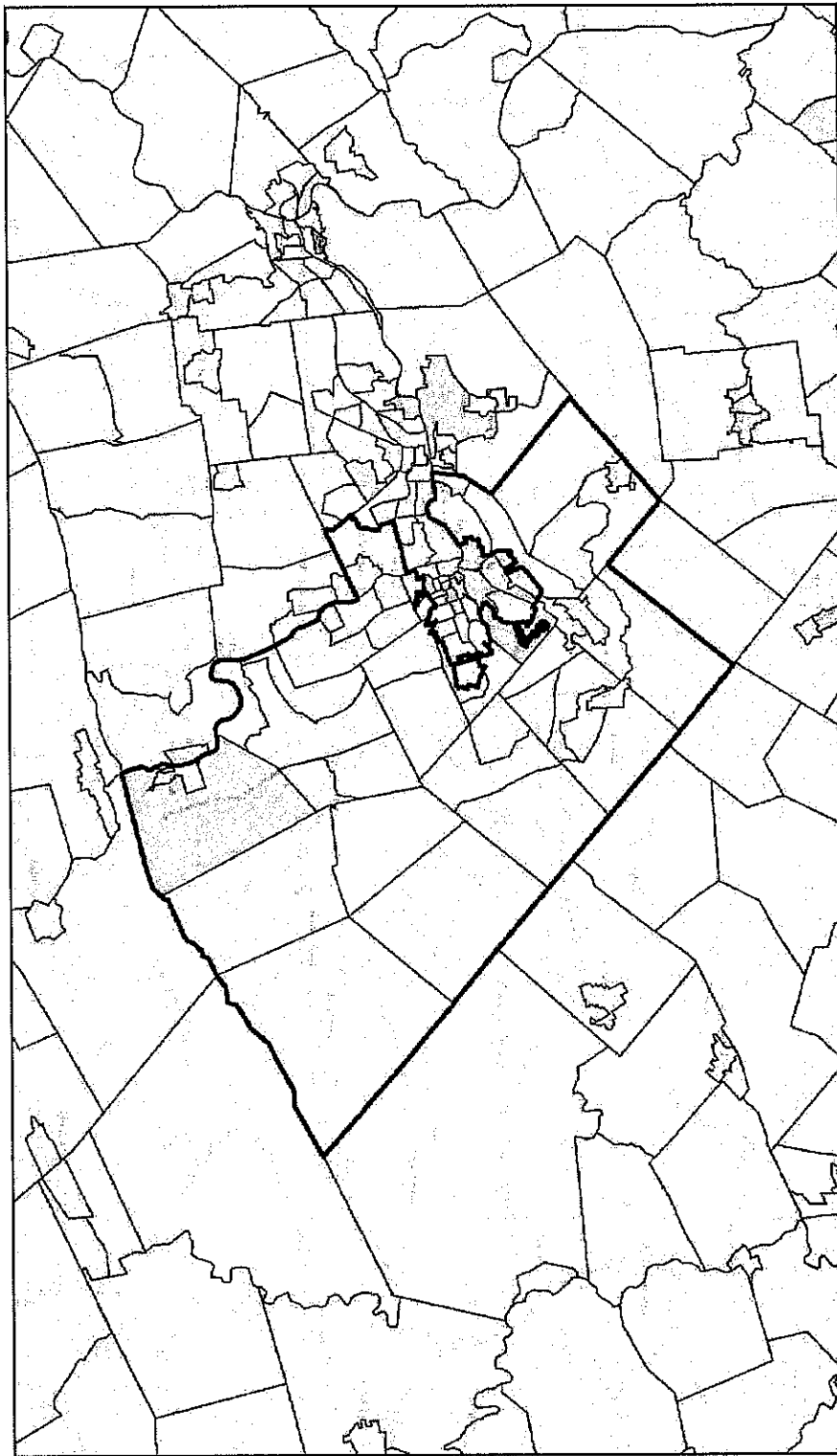


2018 Analysis of Impediments to Fair Housing

Background Data



% of Moderate Income Households with Overcrowding



October 18, 2016

Override 1 MIHHWithOvercrowding
T10_LE80_OC_PCT
6.81-14.56%
14.56-24.47%
0-6.81%

1:426,572
0 3.5 7 10 14 mi
0 5 10 20 km

Sources: Esri, HERE, Garmin, USGS, Imagery, Interim, P, NRCAN, Esri, Japan, METI, Esri, China (Hong Kong), Swisstopo, Esri (Taiwan), Esri, DeLorme, NAVTEQ, and the GIS User Community



H. Cost Overburden

Overall, there is a housing shortage in Lehigh County. Many residents of Lehigh County, PA are faced with a lack of affordable housing and the fact that many of the County's lowest income households are paying more than 30% of their total household income on housing related costs. The following information was noted: 12,254 White households were cost overburdened by 30% to 50%; 9,072 White households were cost overburdened by greater than 50%; 572 Black/African American households were cost overburdened by 30% to 50%; 225 Black/African American households were cost overburdened by greater than 50%; 283 Asian households were cost overburdened by 30% to 50%; 375 Asian households were cost overburdened by greater than 50%; and lastly, 730 Hispanic households were cost overburdened by 30% to 50%; and an additional 512 Hispanic households were cost overburdened by greater than 50%.

It must be noted, however, that the CHAS data is not provided per jurisdiction, but by municipality, county, city, etc. While the HUD AFFH Tool data provides information for the Lehigh County entitlement, CHAS data is simply provided on a county level in this case, which means City of Allentown data is included.

Table II-22 – Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	57,746	13,979	9,072	608
White	51,835	12,254	7,840	424
Black / African American	1,144	572	225	75
Asian	1,858	283	375	75
American Indian, Alaska Native	120	0	0	0
Pacific Islander	0	0	0	0
Hispanic	2,333	730	512	23

Data Source: 2009-2013 CHAS



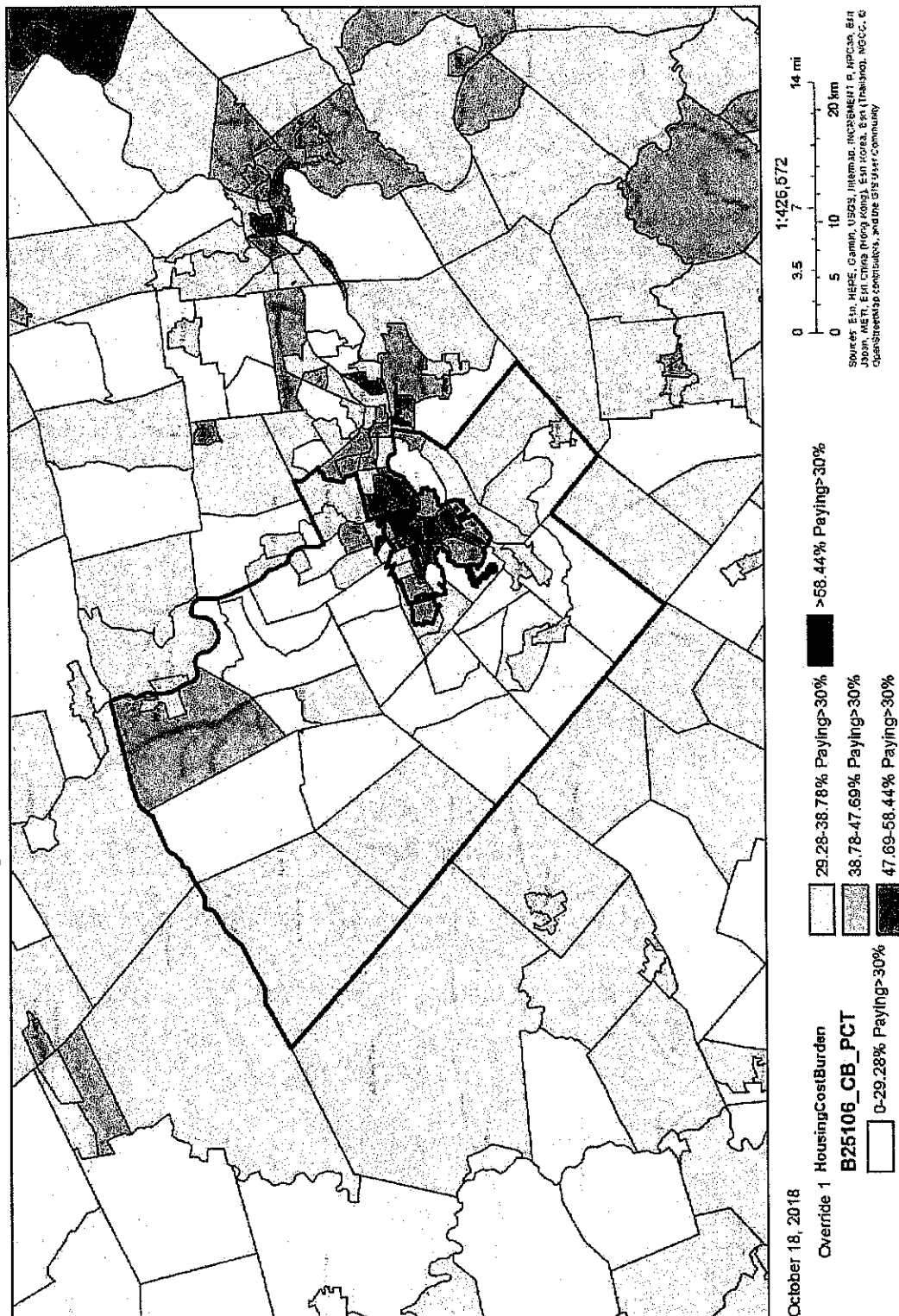
A total of 12,254 White households were considered cost overburdened by between 30% and 50%, which is 87.7% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is slightly lower than the percentage of households that the White category comprises (88.9%). A total of 572 Black/African American households were considered cost overburdened by between 30% and 50%, which is 4.1% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is higher than the percentage (2.5%) of the total households the Black/African American category comprises. A total of 283 Asian households were considered cost overburdened by between 30% and 50%, which is 2.0% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is slightly lower than the 3.2% of the total number of households the Asian category comprises. A total of 730 Hispanic households were considered cost overburdened by between 30% and 50%, which is 5.2% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is slightly higher than the 4.4% of the total number of households that the Hispanic category comprises.

The following four (4) maps illustrate census tracts where there are housing cost overburdens for all households, Extremely Low, Very Low, and Low Income Households.

- Housing Cost Burden – Page 76
- Percentage Extremely Low Income Households with Severe Cost Burden - Page 77
- Percentage Very Low Income Households with Severe Cost Burden - Page 78
- Percentage Low Income Households with Severe Cost Burden - Page 79

Background Data

Housing Cost Burden - Lehigh County, PA





% of Extremely Low Income Households with Severe Cost Burden



October 18, 2018

Override 1 ELIHHWithCostBurden

T8_LE30_CB50_PCT

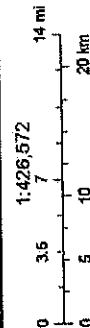
0-37.10%

37.10-55.07%

55.07-70.15%

70.15-85.48%

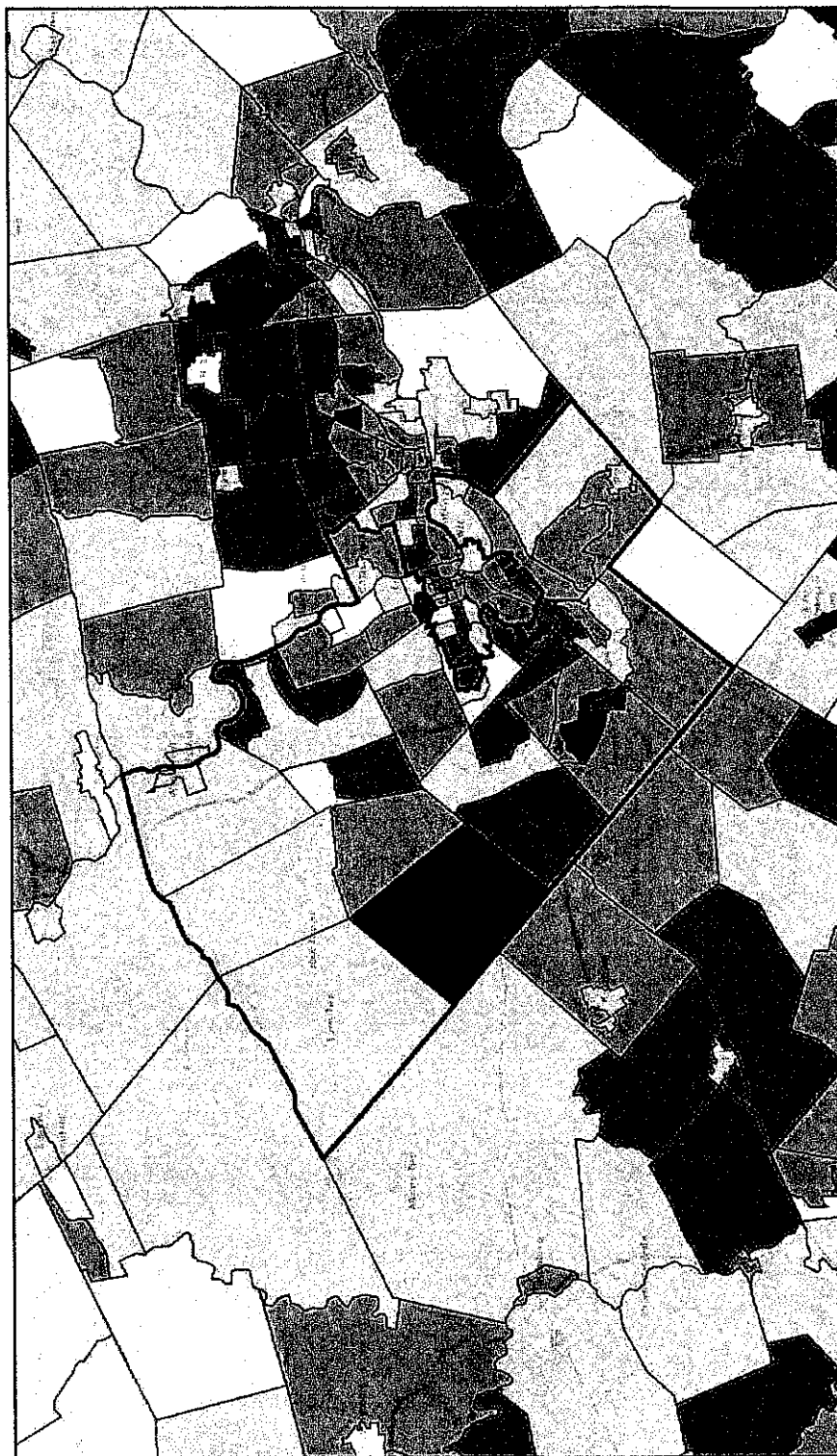
>85.48%



Sources: Est. HHs, USGS, InMap, INCREMENT P, MECAN, BUN
Japan, METI, Evi China (Hong Kong), Evi Korea, Evi Thailand, STCC, B
OpenStreetMap contributors, and the GIS User Community

Background Data

% of Low Income Households with Severe Cost Burden



October 18, 2018

Override 1 LIHWWithCostBurden

T8 LE50 CB50 PCT

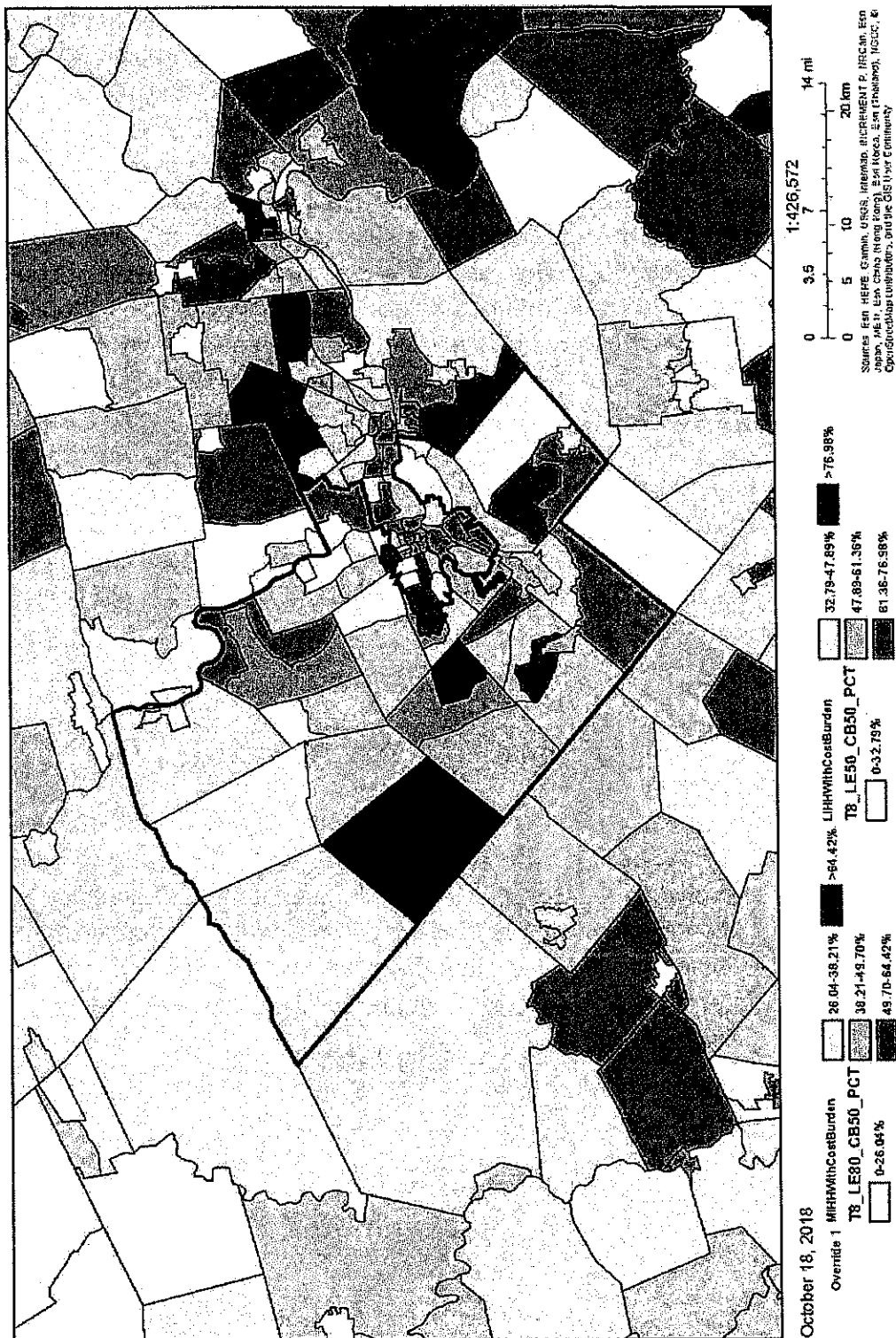
0-32.79%

>76.98%

47.89-61.36%

51.36-76.98%

Sources: Esri, HERE, DeLorme, Mapbox, Microsoft, Swirecity, Japan, VMAP, © OpenStreetMap contributors, and the GIS User Community





A total of 7,840 White households were considered cost overburdened by greater than 50%, which is 86.4% of the total number of households that were considered cost overburdened by greater than 50%. This number is slightly lower than the 88.9% of the total number of households that the White category comprises. A total of 225 Black/African American households were considered cost overburdened by greater than 50%, which is 2.5% of the total number of households that were considered cost overburdened by greater than 50%. This number is equal to the total share of households that the Black/African American category comprises (2.5%). A total of 375 Asian households were considered cost overburdened by between 30% and 50%, which is 4.1% of the total number of households that were considered cost overburdened by between 30% and 50%. This number is higher than the 3.2% of the total number of households that the Asian category comprises. A total of 512 Hispanic households were considered cost overburdened by greater than 50%, which is 5.6% of the total number of households that were considered cost overburdened by greater than 50%. This number is slightly higher than the 4.4% of the total number of households that the Hispanic category comprises.

I. Housing Problems

A household is considered to have a housing problem if it is cost overburdened by more than 30% of their income, if it is experiencing overcrowding, and/or if it has incomplete kitchen or plumbing facilities. The four housing problems are: lacks complete kitchen facilities; lacks complete plumbing facilities; has more than one person per room; and is cost burden greater than 30%. The following tables illustrate the disproportionate needs in Lehigh County:

**Table II-23 – 0%-30% of Area Median
Income (Extremely Low Income)**

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,530	1,427	543
White	2,914	1,212	424
Black / African American	140	55	25
Asian	154	35	75
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	259	113	23

Data Source: 2009-2013 CHAS

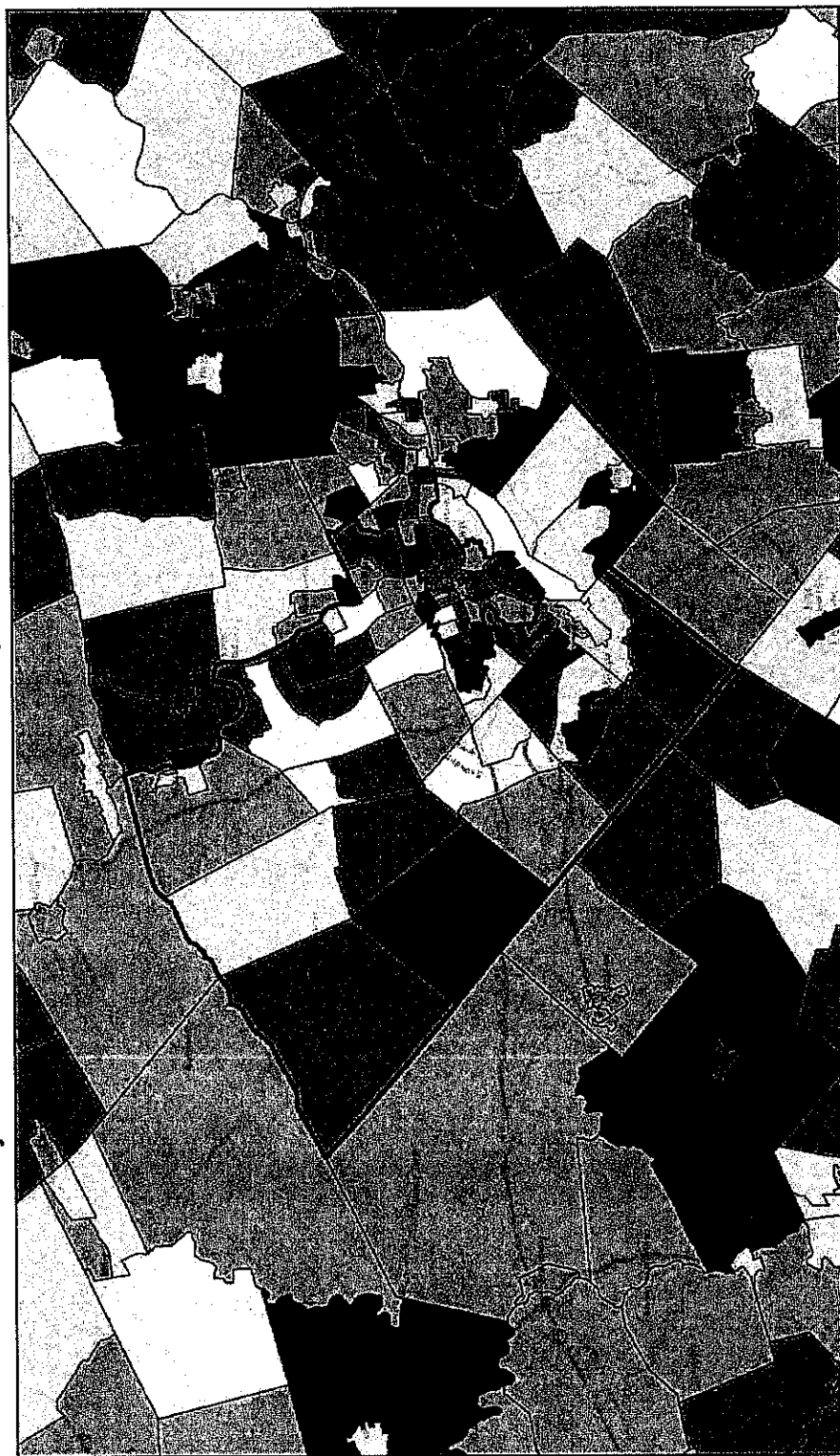
*The four housing problems are:

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

The following map illustrates the location by Census Tract where extremely low-income households have severe housing problems.

Background Data

% of Extremely Low Income Households with Any of 4 Severe Housing Problems



October 18, 2018

Override 1 ELIHHWithHousingProblems

T2 LE30 HP2 PCT

0-39.29%

>86.84%

39.29-57.46%

57.46-72.31%

72.31-86.84%

1:428,572

0	3.5	7	14 ml
1:426,512			

Sources: ERI, HERE, GAMMA, USGS, INTERNET, NACAN, ERI
JAPAN, METI, ERI CHINA (HONG KONG), ERI KOREA, ERI (THAILAND), USGS, ERI
OPERATIONS/STANDARD CONVENTIONS, and the GIS User Community

**Table II-24 – 30%-50% of Area
Median Income (Low-Income)**

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,884	4,041	0
White	2,674	3,731	0
Black / African American	50	99	0
Asian	90	59	0
American Indian, Alaska Native	0	45	0
Pacific Islander	0	0	0
Hispanic	49	100	0

Data Source: 2009-2013 CHAS

*The four housing problems are:

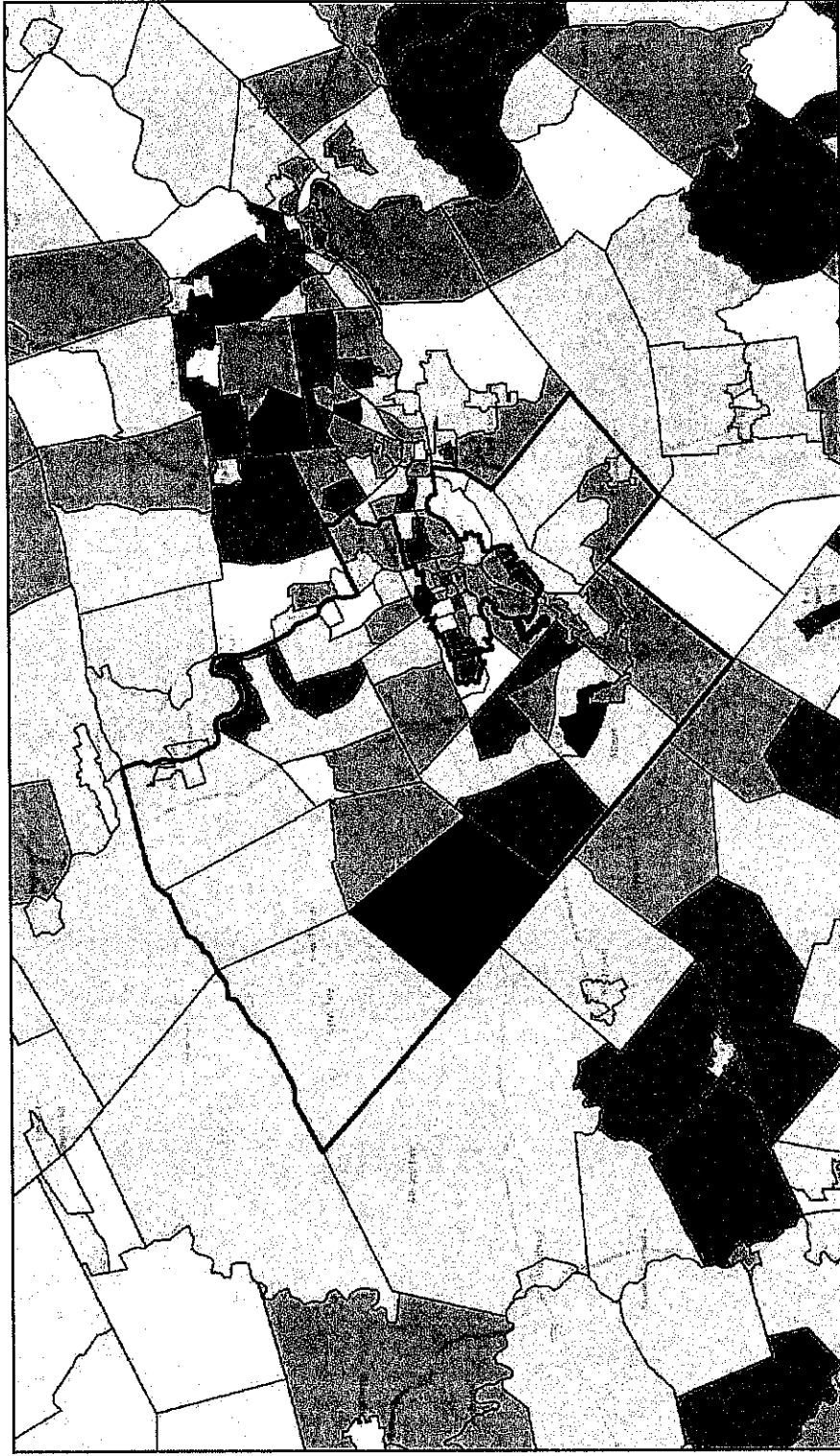
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

The following map illustrates the location by Census Tract where very low-income households have severe housing problems.



Background Data

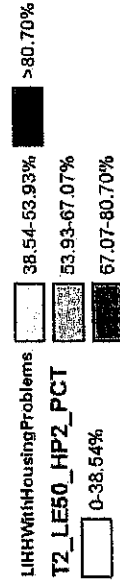
% of Low Income Households with Any of 4 Severe Housing Problems



October 18, 2018

Override 1 LIHHWithHousingProblems

T2_LE50_HP2_PCT



0 3.5 7 14 mi
0 5 10 20 km

Source: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NGC, Swis-
sTopo, GEBCO, Esri, DigitalGlobe, GeoEye, AeroGRID, IGN, Esri, Map
box, Swisstopo, Esri, Esri (Japan), Esri (Korea), Esri (Thailand), Esri, Esri
Copyright, and the GIS User Community

**Table II-25 – 50%-80% of Area Median Income**

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,269	10,145	0
White	1,757	9,045	0
Black / African American	170	239	0
Asian	119	75	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	192	667	0

Data Source: 2009-2013 CHAS

*The four housing problems are:

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

The following map on page 86 illustrates the location by Census Tract where low-income households have severe housing problems.



Background Data

% of Moderate Income Households with Any of 4 Severe Housing Problems

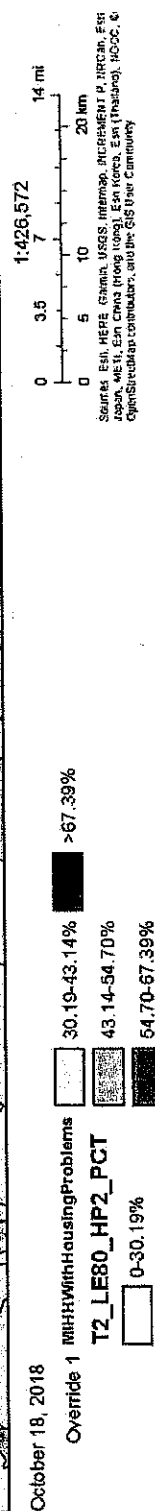
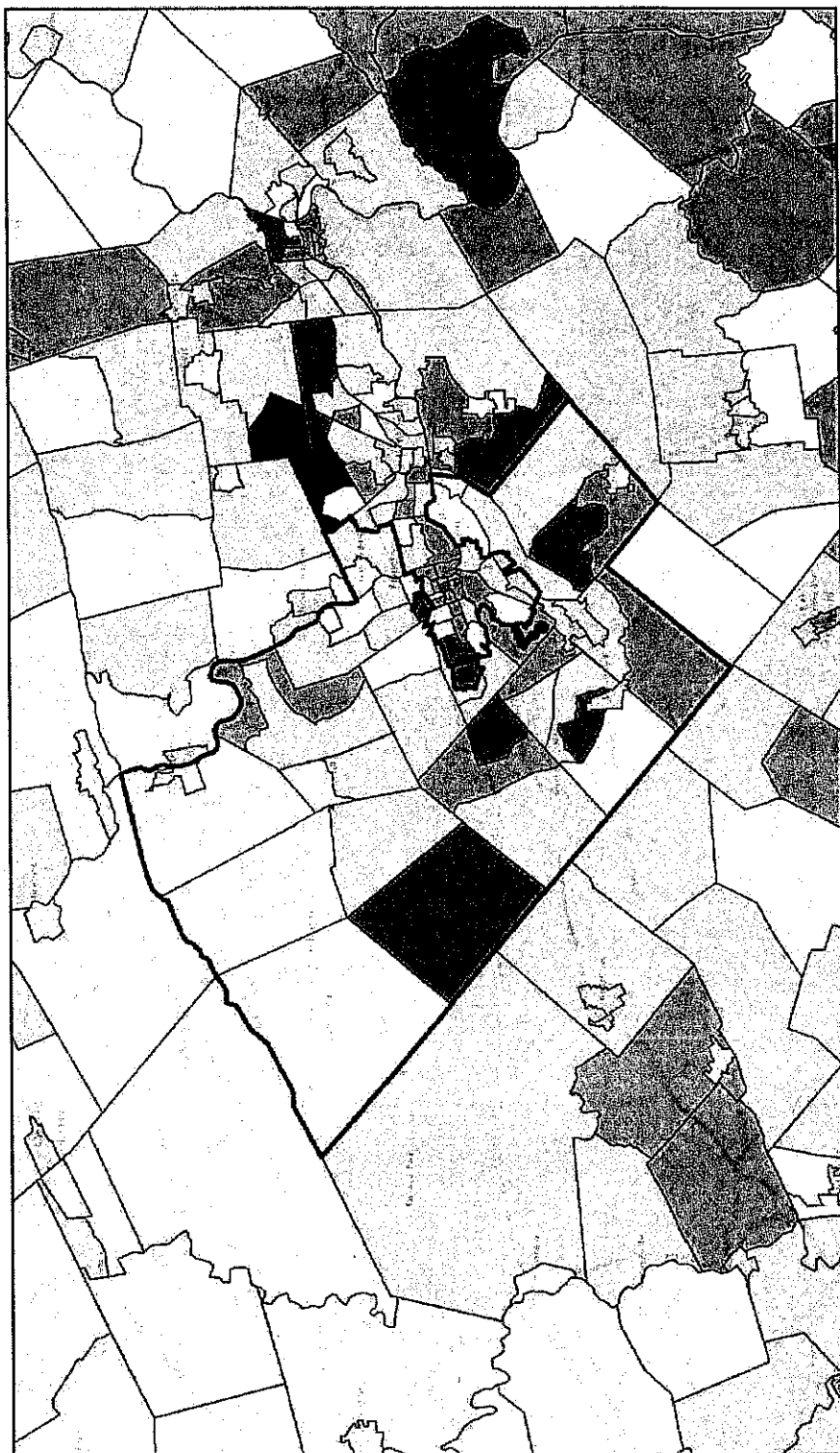




Table II-26 – 80%-100% of Area Median Income

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	588	7,888	0
White	488	7,038	0
Black / African American	20	165	0
Asian	24	143	0
American Indian, Alaska Native	0	35	0
Pacific Islander	0	0	0
Hispanic	0	450	0

Data Source: 2009-2013 CHAS

*The four housing problems are:

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

The population cohort that earns more than the median income has the lowest number of housing problems. Based on these tables and available information, the following racial/ethnic groups are disproportionately affected by housing problems: the **0-30% AMI** Black/African-American racial group made up 4.0% of all income-level housing problems, but only 2.5% of the number of households; the **0-30% AMI** Asian racial group made up 4.4% of all income-level housing problems, but only 3.2% of the number of households; the **0-30% AMI** Hispanic racial group made up 7.3% of all income-level housing problems, but only 4.4% of the number of households; the **30-50% AMI** White racial group made up 92.7% of all income-level housing problems, but slightly less (88.9%) of the number of households; the **50-80% AMI** Black/African-American racial group made up 7.5% of all income-level housing problems, but substantially less (2.5%) of the number of households; the **50-80% AMI** Asian racial group made up 5.2% of all income-level housing problems, but just 3.2% of the number of households; the **50-80% AMI** Hispanic racial group made up 8.5% of all income-level housing problems, but just 4.4% of the total number of households; the **80-100% AMI** Black/African-American racial group made up 3.4% of all income-level housing problems, but just 2.5% of the number of households; the **80-**



100% AMI Asian racial group made up 4.1% of income-level housing problems, but just 3.2% of all households.

J. Disabled Households

The following table includes the 2012-2016 American Community Survey estimates which show the number of disabled individuals in Lehigh County (excluding the City of Allentown). The total population five (5) years and over is 236,527 and the disabled population is 27,972, or 11.8%. This is an indicator of the need for housing for the disabled who are mainly low- and moderate-income and who are usually unable to find housing resources that are both accessible and affordable.

Table II-27 – Disability Status for the Lehigh County Jurisdiction, PA

Disability Status of the Civilian Non-Institutional Population	Total Population Over 5 Years of Age	Population with a Disability	Percent with a Disability
Total civilian noninstitutionalized population	236,527	27,972	11.8%
Population under 5 years	12,530	114	0.9%
With a hearing difficulty	-	66	0.5%
With a vision difficulty	-	48	0.4%
Population 5 to 17 years	37,835	380	1.0%
With a hearing difficulty	-	191	0.5%
With a vision difficulty	-	189	0.5%
With a cognitive difficulty	-	-	-
With an ambulatory difficulty	-	-	-
With a self-care difficulty	-	-	-
Population 18 to 64 years	145,343	22,719	15.6%
With a hearing difficulty	-	2,180	1.5%
With a vision difficulty	-	2,025	1.4%
With a cognitive difficulty	-	5,853	4.0%
With an ambulatory difficulty	-	5,813	4.0%
With a self-care difficulty	-	2,075	1.4%
With an independent living difficulty	-	4,773	3.3%
Population 65 years and over	40,819	26,392	64.7%



Background Data

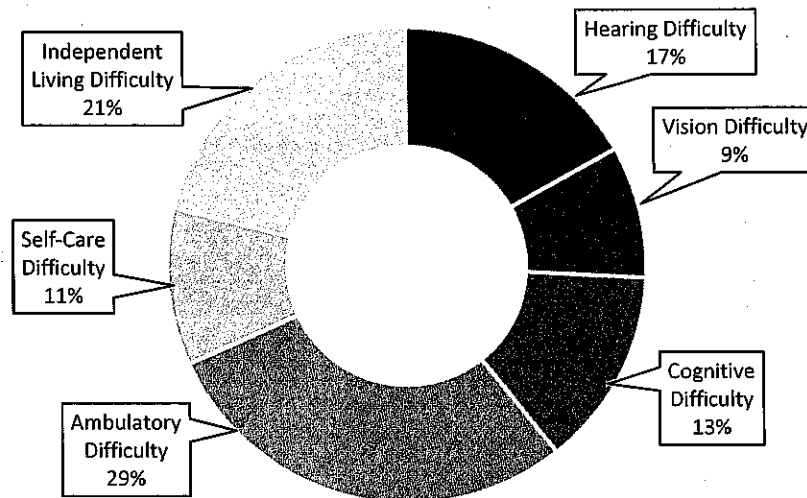
With a hearing difficulty	-	5,595	13.7%
With a vision difficulty	-	2,217	5.4%
With a cognitive difficulty	-	3,146	7.7%
With an ambulatory difficulty	-	7,616	18.7%
With a self-care difficulty	-	2,607	6.4%
With an independent living difficulty	-	5,211	12.8%
SEX			
Male	115,869	13,113	11.3%
Female	120,658	14,859	12.3%
RACE AND HISPANIC OR LATINO ORIGIN			
White alone	209,840	25,340	12.1%
Black or African American alone	7,156	831	11.6%
American Indian and Alaska Native alone	309	46	14.9%
Asian alone	9,206	481	5.2%
Native Hawaiian and Other Pacific Islander alone	8	0	0.0%
Some other race alone	5,083	706	13.9%
Two or more races	4,925	568	11.5%
White alone, not Hispanic or Latino	197,454	24,290	12.3%
Hispanic or Latino (of any race)	19,449	2,009	10.3%

Source: 2012-2016 American Community Survey

Of the population age 65 and older, 65.7% have a disability, consisting mainly due to ambulatory difficulty (18.7%), a hearing disability (13.7%), and an independent living difficulty (12.8%). The overall data shows a fairly even percentage between males and females, with 11.3% and 12.3% of the respective populations having a disability.



**Chart II-16 – Type of Disability for Population
5 Years and Over in Lehigh County, PA**



Source: 2012-2016 American Community Survey

Lehigh County and the Lehigh County Housing Authority recognize the need for accessible and visitable housing units in the County. Both the County and the Housing Authority ensure that multi-family housing developments which are rehabilitated or constructed using Federal funds, must comply with ADA requirements, and encourage visitable units beyond minimum requirements. In recent years, Lehigh County has used CDBG funds to promote accessibility in the County, including funding for the Lehigh Valley Center for Independent Living's People Living in Accessible Community Environments (PLACE) Program as well as ADA curb cuts in Catasauqua, Emmaus, and Macungie Boroughs.

Another issue is a lack of affordable housing that is accessible. Public housing often has higher proportions of disabled residents and with most public housing consisting of 1-bedroom units, it is difficult for families and larger households with disabled members to find housing that is both accessible and affordable.

While single-family housing is generally not accessible, the Fair Housing Act requires that multifamily properties built after 1991 meet Federal accessibility standards; therefore, multifamily housing units built after 1991 are in compliance with Federal Law and meet the minimum level of accessibility. However, as 71.2% of housing units in Lehigh County were built prior to



1990, many of these units are more likely to have narrow halls, stairs, narrow doors, and little room for ramps to entrance doors.

The HUD AFFH Tool provides data on the number and percentage of persons with disabilities residing in the four (4) categories of publicly supported housing programs in Lehigh County. While the percentages of disabled residents in publicly supported housing are fairly similar between Lehigh County and the region, there is a slightly higher disability rate in the Housing Choice Voucher Program and the Project-Based Section 8 units.

Table II-27 – Disability by Publicly Supported Housing

Housing Type	Lehigh County		Allentown-Bethlehem-Easton PA-NJ MSA	
Public Housing	83	29.64%	1,309	40.03%
Project-Based Section 8	71	32.57%	530	22.55%
Other Multifamily	N/A	N/A	14	8.09%
HCV Program	298	37.44%	1,666	29.39%

Source: AFFH Tool

Per the Lehigh County Housing Authority's Statement of Policies Governing Admission to and Continued Occupancy of Low Rent Public Housing, preferences are given in the selection of tenants to (1) persons displaced by government action, (2) Lehigh County residents who are working, elderly, or disabled, and (3) non-Lehigh County residents who are working, elderly, or disabled. For tenants who are not recipients of benefits under Section 223 of the Social Security Act or Section 102(b)(5) of the Developmental Disabilities Services and Facilities Construction Amendment of 1970, all that is required to show handicap or a disability is a Doctor's Certification as to the degree and possible length of such disability.

Other policies and practices that affect the ability of disabled County residents to access publicly supported housing include:

- LCHA's website is not completely accessible to individuals with visual impairments per W3C Web Accessibility guidelines.
- LCHA's Statement of Policies Governing Admission to and Continued Occupancy of Low Rent Public Housing – the Housing Authority will provide accessible materials for the hearing and sight-impaired persons. Additionally, the Housing Authority will make special arrangements to



take the application of persons who are unable to come to its offices due to a disability. If alternate forms of communication are necessary other than in writing, the Housing Authority will arrange for an alternate communication method.

Lehigh County and LCHA held meetings with the Lehigh Valley Center for Independent Living (LVCIL) and the Center for Vision Loss to obtain an understanding of the issues affecting their clients with disabilities. Additionally, a phone interview was completed with the Vice President of the Lehigh Valley Partnership for a Disability Friendly Community.

The LVCIL operates a Community Accessibility Program (CAP) to improve the accessibility of communities across the region. CAP specializes in ADA Accessibility Site Surveys for parks and outdoor recreation areas, trails, festivals and fairs, pools, and other public facilities. Additionally, CAP offers ADA and Disability Awareness Education on topics such as the Americans with Disabilities Act, Universal Design, Visitability Standards, Practical Low Cost Ways to Improve Accessibility, and others. Lehigh County typically provides funding to LVCIL for the Community Accessibility Program through CDBG funds. During the 2016 CAPER period, LVCIL and North Penn Legal Services co-sponsored a training program to encourage landlords to rent to persons with disabilities.

Government and Housing Authority Facilities:

Lehigh County does not discriminate on the basis of disability in access to, nor operations of, its programs, services, or activities. If a resident of Lehigh County requires additional assistance to gain access to County facilities, he or she may contact the County's designated ADA Coordinator, Judith Johnston. The Coordinator can be contacted at: Government Center, Room 103, 17 South Seventh Street, Allentown, PA 18101-2401; (phone) 610-782-3130; (email) ADAACoordinator@lehighcounty.org.

There are twenty-three (23) municipalities in Lehigh County; twenty-five (25) including Allentown and a small portion of Bethlehem. In addition, the County contains 16 Census Designated Places (CDPs). All municipalities have various procedures to address accessibility concerns. As Lehigh County has no authority regarding zoning laws, it will continue to encourage zoning regulations promoting ADA accessibility. Through the efforts of the Lehigh Valley Planning Commission, there are model zoning ordinances and amendments for communities to use to bring their zoning ordinance(s) into compliance with ADA and the Fair Housing Act.



The Lehigh County Housing Authority provides reasonable modifications upon request. When a tenant requests an accommodation, the Housing Authority may verify the disability only to the extent necessary to ensure the applicants are entitled to the preference. However, the Housing Authority will not ask what the disability is. The process a tenant may go through to request modifications includes the contacting of a Building Manager or Tenant Selection Supervisor and providing any required documentation supporting the request. Once modifications are deemed reasonable, the work will be coordinated with the tenant; if the modifications are tantamount to those required for a fully accessible unit, the tenant/applicant will be placed on an Authority transfer/waiting list for the next available unit with the features requested, if so desired.

Additionally, the Lehigh County Housing Authority provides accessible materials for hearing and sight-impaired persons and will make special arrangements to accommodate persons who are unable to visit the Housing Authority offices. If alternate forms of communication are necessary other than in writing, the Housing Authority will arrange for the alternative communication, such as Sign Language interpretation, or a foreign language interpreter.

Public Infrastructure:

Lehigh County's Department of Community and Economic Development administers funds through the Federal Community Development Block Grant (CDBG) program to benefit low- and moderate-income areas. Funds are used for street reconstruction in low- and moderate-income areas of the County, sewer and stormwater improvements in low- and moderate-income areas of the County, and curb cuts/ADA improvements where needed. Funding is also provided to make improvements to public and community facilities to make them ADA compliant.

Schools:

The Pennsylvania Department of Education operates a Pennsylvania Training and Technical Assistance Network (PaTTAN), which provides a full array of professional development and technical assistance targeted to improving student results. The Local Educational Agency (LEA) is responsible for the provision of special education and related services for every student with a disability under the Individuals with Disabilities Education Act (IDEA) and Section 504 of the Rehabilitation Act of 1973.



Jobs:

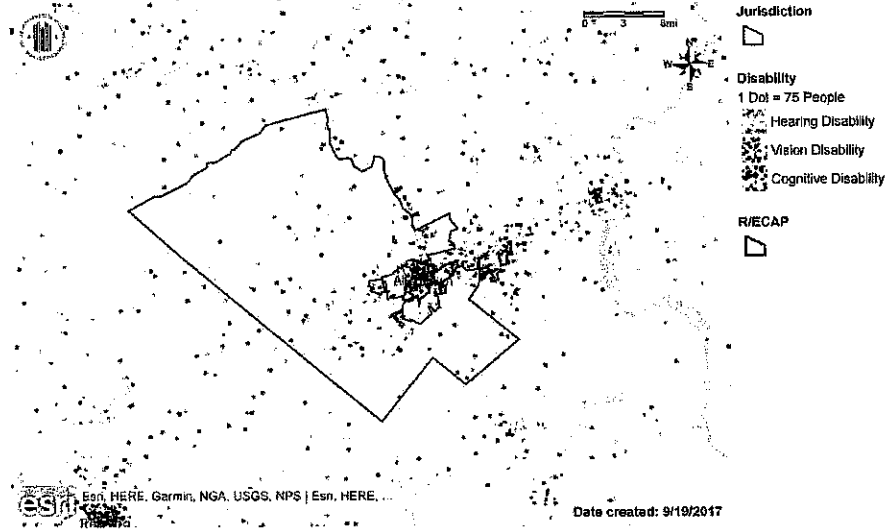
The Carbon Lehigh Intermediate Unit (CLIU) administers a Vocational and Independence Program (VIP) for students transitioning out of high school. The program places a focus on soft skills, independence, employment readiness, and integrated competitive employment. This holistic program provides hands-on work experiences at Cedarbrook Nursing Home and training in work essential skills, such as appearance, communication, job performance, and community-appropriate behaviors. In addition, the program provides lessons in Independent Community Travel (ICT) and Community Based Instruction (CBI) once a week, where interns go into the community to learn how to travel safely and efficiently, as well as practice taking public transportation and help develop age-appropriate skills for functioning outside the school environment.

Trends:

The HUD AFFH Tool provides an overview of the number and percent of Lehigh County residents with a disability. The most common disability in both Lehigh County and the Allentown-Bethlehem-Easton PA-NJ MSA is ambulatory difficulty, comprising 5.89% and 6.92% of the respective populations. In Lehigh County, ambulatory is closely followed by independent living difficulty (4.15%) and cognitive difficulty (4.11%).



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 14 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Lehigh County (CDBG)

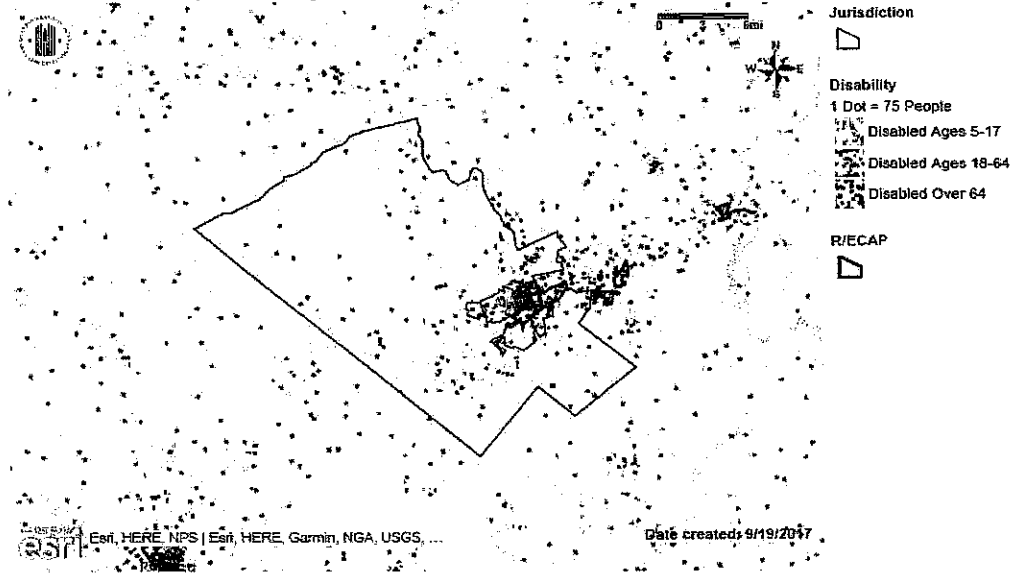
Region: Allentown-Bethlehem-Easton, PA-NJ

Map 14 illustrates disability types throughout Lehigh County. The largest concentration of disabled residents in the region is in the City of Allentown, as well as Whitehall Township (Fullerton) and Catasauqua Borough, just north of Allentown. Overall, these disabled residents have greater access to employment opportunities, but according the HUD Maps on pages 76-79, may have higher rental costs and have moderate percentages of cost-burdened households.



Map 15 shows there are 22,898 people ages five years and older in Lehigh County with a disability. HUD Table II-27 (Page 91), shows which types of publicly supported housing have the highest concentrations of people with disabilities. In Lehigh County, 37.44% of all Housing Choice Vouchers have one or more disabilities, followed by 32.57% of Section 8 Project-Based units, and 29.64% of public housing units.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 15 - Disability by Age Group

Description: All persons with disabilities by age range (5-17)(18-64)(65+) with R/ECAPs

Jurisdiction: Lehigh County (CDBG)

Region: Allentown-Bethlehem-Easton, PA-NJ



III. Review/Update to Original Plan

In FY 2014, Lehigh County and ten (10) other agencies came together to form the Lehigh Valley Sustainability Consortium (LVSC) in order to apply for a Sustainable Communities Regional Planning Grant from HUD. LVSC hired an independent consulting firm to prepare a Regional Analysis of Impediments (RAI) to Fair Housing Choice. The RAI was submitted to HUD on October 30, 2014, and each entitlement community adopted the plan. However, the RAI was never approved by HUD. This Regional A.I. experience helped Lehigh County and the Housing Authority staff hone their techniques to involve more participants and residents to join in the planning efforts.

Therefore, since the 2014 RAI was not approved by HUD, the review of past impediments will be based on Lehigh County's 2009 Analysis of Impediments to Fair Housing Choice. The following paragraphs restate the identified impediments from the 2009 Analysis of Impediments to Fair Housing Choice and summarize the progress made on each for the time period of 2009 through 2018.

A. Summary of 2009 Impediments

- **Impediment # 1: Increase and Enhance Fair Housing Outreach and Education:**
 - a. **Facilitate fair housing training for real estate sales persons, municipal officials and planners, landlords, low-income housing developers, housing authority staff, and local mortgage lenders.**

Accomplishments:

Lehigh County has taken the following actions to reach this goal:

- Lehigh County's Community and Economic Development staff continued to participate in the region's Fair Housing Consortium, the Lehigh Valley Fair Housing Project. Members of this consortium include North Penn Legal Services, representatives from Northampton County, and the Cities of Allentown, Bethlehem, and Easton. Meetings were held on a quarterly basis.



- Lehigh County Community and Economic Development Staff attended Fair Housing Conferences on zoning since 2014.
- On April 27, 2017, a Fair Housing event was held at the Northampton Community College.
- North Penn Legal Services has completed a Fair Housing activity every year since 2010, including conferences, seminars, and workshops. The last event, entitled "Landlord and Tenant Law" took place on April 21, 2017. There were 80 participants, including landlords and tenants, and additional materials were left for the public.
- Lehigh County has partnered with Northampton County and North Penn Legal Services to present two (2) educational events on Fair Housing Implementation.
- Lehigh County awarded \$30,000 in Affordable Housing Trust Funds (AHTF) to the Community Action Committee of the Lehigh Valley (CACLV) to implement its Community Action Financial Services Program; this program provides homebuyer education, counseling, foreclosure prevention, and recovery counseling to low- and moderate-income persons.
- North Penn Legal Services partnered with Lehigh County, Northampton County, and the Cities of Allentown, Bethlehem, and Easton to provide education for community agencies across the Lehigh Valley. They reached over 400 housing professionals and social service providers on their website and through social media. Organizations and events that NPLS reached included: Fair Housing APA Convention, Greater Lehigh Valley Realtors, Lehigh Valley Center for Independent Living, CACLV, Community Health Workers, GLVR – Diversity Task Force, Catasaqua Library, Fair Housing Forum, and Berkshire Hathaway.
- The Lehigh County Regional Housing Summit took place on February 8, 2018 at DeSales University. It featured presentations and panels on fair housing issues in Lehigh County and the region. Lawyers that attended or presented at the summit received a half-day Continuing Legal Education (CLE) credit.



- b. Make presentations annually to local churches, soup kitchens, high school seniors, housing authority residents, and/or nonprofit organizations on fair housing issues.**

Accomplishments:

Lehigh County has taken the following actions to reach this goal:

- North Penn Legal Services continued to provide assistance to residents facing eviction, those who were denied housing, and/or were forced to live in uninhabitable conditions. NPLS assisted 42 persons and closed 37 individual cases. Services for these clients included: illegal discrimination prevention, foreclosure or home loss avoidance, eviction prevention, legal advice and referrals, overcoming a denial of a tenant's rights under lease, housing and shelter preservation, and advising those facing mortgage foreclosure.
- Lehigh Valley Center for Independent Living (as a designated housing counseling organization) conducted one (1) outreach session on fair housing issues to housing professionals and community service organizations. LVCIL received CDBG funds to carry out public service activities, which included locating housing case management, housing searches, placement, and specialized support services.
- North Penn Legal Services distributed handbooks entitled "Self Help Handbook for Tenants," which included practical landlord tenant advice along with information about all the Magisterial District Courts in Lehigh County. Additional copies were provided to the Lehigh County Law Library. Handbooks were printed in both English and Spanish, and other materials were translated as needed. News and notes about Fair Housing were sent in a newsletter to 836 unique email addresses.
- Lehigh County continued to participate in the region's Fair Housing Consortium, the Lehigh Valley Fair Housing Project. Meetings were held on a quarterly basis.

- c. Develop a webpage on the County website dedicated exclusively to fair housing issues. Add the fair housing logo to all Federal program materials.**



Accomplishments:

Lehigh County has taken the following actions to reach this goal:

- Lehigh County updated its fair housing section on the County website with news and items regarding fair housing, contact information, and complaint filing procedures.
- The County continued to increase geographic choice in housing by providing links on its website for low-income households.
- The Lehigh Valley Planning Commission has written a municipal guidance document on Fair Housing; this document was released in December of 2015 and explains Fair Housing as it relates to municipal zoning and code enforcement and the responsibilities of the region's communities to provide for inclusive residential opportunities. LVPC has updated a series of model municipal ordinances to address fair housing accommodation in the region's typical community and housing types.
- Lehigh County has posted HUD's Spanish-language fair housing video on the County's website.

d. Development of an up-to-date, centralized housing database for Lehigh County on a Lehigh County Community Development Office website.

Accomplishments:

Lehigh County has taken the following actions to reach this goal:

- Lehigh County assisted in the organization of a Federal supported community-based system that organizes key elements in the community to direct attention to and help develop strategies to affirmatively further fair housing.
- The Lehigh Valley Planning Commission (LVPC) recently launched a data project aimed at providing knowledge and data to County residents. The program is entitled "DataLV" which will act as a statistical snapshot of the Lehigh Valley that can be updated as new data arrives and is associated with the LVPC's ArcGIS Online mapping database.



- Lehigh County developed a centralized reporting database system.
 - Regional developers held a roundtable at the Housing Summit on February 8, 2018. A housing study group was founded under the LVPC with the help of the Lehigh County Fair Housing Officer from the conversations at the developers' roundtable. The group was designed to study housing choice in the region and create recommendations for fair housing.
- e. Continue to make referrals to the Pennsylvania Human Relations Commission and U.S. Department of Housing and Urban Development (HUD) in instances of discrimination.**

Accomplishments:

Lehigh County has taken the following actions to reach this goal:

- Lehigh County has continued to refer complaints to the Pennsylvania Human Relations Commission and the U.S. Department of Housing and Urban Development (HUD) in instances as needed.
- f. Disseminate current information on Fair Housing rights in the form of posters and pamphlets throughout Lehigh County. In addition, utilize public service announcements on cable television. Notify local municipalities of Zoning issues that may impact housing choice. Post HUD's Spanish-language Fair Housing video on the County's website.**

Accomplishments:

Lehigh County has taken the following actions to reach this goal:

- Fair Housing information was posted at Lehigh and Northampton Transportation Authority bus shelters and on the buses themselves.
- LVCIL and NPLS co-sponsored a training to encourage landlords to rent to people with disabilities. The Landlords for All Program offers educational workshops on what is needed to build successful rental relationships.



g. Appoint a Fair Housing Officer for Lehigh County

Accomplishments:

Lehigh County has taken the following actions to reach this goal:

- Lehigh County appointed a Fair Housing Officer to accept complaints, keep records on existing housing issues, and investigate in conjunction with North Penn Legal Services.
- The County has dedicated more time to Fair Housing by allocating additional funding to the Fair Housing Officer.

• Impediment # 2: Continue to Support Affordable Housing Programs in Lehigh County:

- a. Continue the commitment to affordable housing activities (rehabilitation, land banking). These activities provide a valuable opportunity to improve housing choice for members of the protected classes who are most often low-moderate income households**

Accomplishments:

Lehigh County and the Lehigh County Housing Authority have taken the following actions to reach this goal:

- Lehigh County continued to allocate funds from its Affordable Housing Trust Fund (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. Lehigh County recently raised the fee from \$13 to \$26 per document. The Affordable Housing Trust Funds revenue is used to fund affordable housing initiatives and up to 15% may be used for the administrative costs to implement the initiatives. In FY 2017, Lehigh County allocated \$760,265 from its AHTF. There was no allocation for FY 2018. In FY 2019, Lehigh County proposes to allocate \$459,000 from its AHTF.
- Additionally, the Lehigh Valley Community Land Trust (LVCLT) works to create and preserve affordable homes throughout the



Lehigh Valley. LVCLT constructs or renovates homes and sells them to income-qualified applicants in its program, providing homeownership support when needed. The Land Trust is administered by the Community Action Committee of the Lehigh Valley and is governed by a Board of Directors, made up of one-third homeowners, one-third public representatives, and one-third community representatives.

- The Community Land Trust, a Community Housing Development Organization (CHDO), is a nonprofit, community-based organization which owns parcels of land and agrees to retain ownership; while the homeowner has every legal right to use and occupy the land, the community land trust maintains ownership of the land. Once a homeowner wishes to sell his or her home, the ground lease protects the future affordability of the property in two ways: (1) a provision in the lease ensures that the house is sold to another homebuyer who is income-qualified and (2) a resale formula allows the homeowner to participate in the equity appreciation of the property by giving the homeowner a pre-agreed upon percentage of the net proceeds at the time of resale.
- The Community Land Trust leases the property for 99 years to maintain affordability.
- Lehigh County Community Land Trust budgeted \$90,962 for rehab activities in FY 2017 and \$169,164 for rehab activities in FY 2018.

b. Ensure that housing units rehabilitated or constructed with Federal funds comply with ADA requirements and encourage visitable units beyond the minimum requirements.

Accomplishments:

Lehigh County has taken the following actions to reach this goal:

- Lehigh County continued to ensure that housing units rehabilitated or constructed with Federal funds comply with ADA requirements.
- LVCIL and NPLS co-sponsored a training event in FY 2015 to encourage landlords to rent to people with disabilities. The "Landlords for All" program offers educational workshops on what is needed to build successful rental relationships.



c. Expand accessibility requirements to universal design for all housing projects financed with Federal funds.

Accomplishments:

Lehigh County has taken the following actions to reach this goal:

- In addition to ensuring that housing units rehabilitated or constructed with Federal funds comply with ADA requirements, Lehigh County encouraged visitable units extending beyond minimum requirements.

d. Support the initiatives of housing providers who work to provide affordable housing for low-income and disabled households.

Accomplishments:

Lehigh County has taken the following actions to reach this goal:

- Lehigh County endorsed and allocated \$50,000 of its Affordable Housing Trust Funds for a LIHTC Application by the Valley Housing Development Corporation for a \$1.2 million project in the Borough of Fountain Hill; this development would have created 91 one-bedroom apartments for 55 years and older persons, but the application was denied for a third time in March 2016.
- Lehigh County continues to encourage and support all providers who develop affordable & accessible housing for persons with disabilities. The County is willing to provide matching funds.

e. Encourage development of affordable rental housing realizing that not all households should be owners and that decent rental housing stabilizes neighborhoods and creates new homeownership opportunities by moving renters away from single-family homes.

Accomplishments:



Lehigh County and the Lehigh County Housing Authority have taken the following actions to reach this goal:

- Lehigh County continued to support affordable housing through the use of the County's Affordable Housing Trust Fund dollars.
- Lehigh County funded an activity that assisted 21 renter-occupied units through rehabilitation of a fire escape.
- Lehigh County is currently funding New Bethany Ministries to renovate Columbia House, a subsidized single room occupancy (SRO) facility. The renovations included floors, outside doors, and bathrooms.
- The Lehigh County Housing Authority uses its Housing Choice Vouchers to promote fair housing choice throughout the County.

f. Adopt a fair housing resolution to publicly advocate for fair housing choice.

Accomplishments:

Lehigh County has taken the following actions to reach this goal:

- Lehigh County continued to annually proclaim April as Fair Housing Month. See attached 2018 Fair Housing Month Proclamation, which was posted online.
- The County held a Regional Housing Summit in conjunction with the proclamation in February of 2018. The summit included a half day of presentations and round tables on Fair Housing Issues.

