



IV. Impediments to Fair Housing 2018

This AI was prepared jointly by the County of Lehigh and the Lehigh County Housing Authority (LCHA). Housing barriers affecting residents of Lehigh County were identified through a robust citizen participation process, which included a series of three (3) public meetings, twelve (12) small interview sessions (with County Departments, Housing Authority Staff, housing residents, and local housing groups), 21 phone surveys, and 194 completed resident surveys (183 in English and 11 in Spanish). Flyers and notices were posted at prominent locations throughout the County, including the on Lehigh County's Facebook page, and emailed to interested parties. In addition, Census data was reviewed, and an analysis of the fair housing complaints in Lehigh County was undertaken.

A. Fair Housing Complaints

1. Lehigh County Department of Economic and Community Development (DCED)

Lehigh County's Department of Economic and Community Development (DCED) has appointed a Fair Housing Officer for Lehigh County. Ms. Paulette Gilfoil has been designated as Fair Housing Officer and is responsible for taking and accepting complaints, recordkeeping, and conducts an investigation in conjunction with North Penn Legal Services. Additionally, there is a Fair Housing page on the County's DCED website that is updated with news and items regarding fair housing (i.e. links to fair housing providers to report housing discrimination).

Lehigh County
Department of Economic and
Community Development
17 S. Seventh Street
Allentown, PA 18101
610-782-3566
610-871-2893 (Fax)
<https://www.lehighcounty.org/Departments/Community-Economic-Development/Fair-Housing>

- **Lehigh County – Fair Housing Officer – Paulette Gilfoil**
17 S. Seventh Street
Allentown, PA 18101
610-782-3566
610-871-2893 (Fax)
paulettgilfoil@lehighcounty.org



2. Pennsylvania Human Relations Commission

The Pennsylvania Human Relations Commission (PHRC) is tasked to enforce state laws that prohibit



pennsylvania
HUMAN RELATIONS COMMISSION

discrimination under the Pennsylvania Human Relations Act, and the Pennsylvania Fair Educational Opportunities Act. The Pennsylvania Fair Educational Opportunities Act, created in 1961 by the General Assembly of the Commonwealth of Pennsylvania and amended in 1992, prohibits discriminatory practices in educational institutions based on race, religion, color, ancestry, national origin, or sex. The Pennsylvania Human Relations Act was created in 1955 and amended in 1997; the Act prohibits certain discriminatory practices because of race, color, religious creed, ancestry, age, or national origin by employers, employment agencies, labor organizations. This Act additionally created the Pennsylvania Human Relations Commission (PHRC) in the Governor's Office and defined its powers; PHRC's mission is "to promote equal opportunity for all and enforce Pennsylvania's civil rights laws that protect people from unlawful discrimination." (PHRC 2014-2017 Strategic Plan.)

The PHRC has its main office in Harrisburg, as well as regional offices in Pittsburgh, Philadelphia, and Scranton. In addition to its staff members, the PHRC has eleven (11) Commissioners appointed by the Governor and confirmed by the State Senate. The PHRC also investigates

employment and housing discrimination complaints on behalf of the U.S. Equal Employment Opportunity Commission (EEOC) and the U.S. Department of Housing and Urban Development (HUD), respectively. The Governor appoints eleven commissioners (confirmed by the Senate) to act as public liaisons, establish policies, and resolve cases not settled voluntarily. The commission is independent and nonpartisan, with the chairperson appointed by the governor and a vice-chairperson, secretary, and assistant secretary elected by commissioners every year. The commission holds monthly meetings, which are open to the public, to address issues of discrimination or civil tension.

Pennsylvania
Human Relations Commission
Harrisburg Regional Office
Riverfront Office Center, 5th Floor
1101-1125 South Front Street
Harrisburg, PA 17104-2515
(717) 787-9784 (Voice)
(717) 787-7279 (TTY)



The PHRC organizes the PA Interagency Task Force on Community Activities and Relations, a group of state agencies unified in preventing and stopping civil tension and violence stemming from conflicts between ethnic or cultural groups. In addition, the PHRC offers hotlines to report bias and hate crimes, as well as an on-line way of filing a complaint regarding discrimination; the current law protects citizens in matters of employment, education, public accommodations, housing, and commercial property.

The PHRC publishes an annual summary of docketed cases filed during the State's fiscal year (July 1st – June 30th). While PHRC began only providing docketed cases that corresponded to a protected classes in 2015, there is still a decline in the number of cases docketed.

**Table IV-1 –PHRC New Complaints Docketed
in the Commonwealth of Pennsylvania**

Category	2012	2013	2014	2015	2016	Total
Employment	2,431	1,852	1,554	421	322	6,580
Housing	243	207	184	9	11	654
Public Accommodations	157	102	78	0	0	337
Total	2,804	2,207	1,839	430	334	7,571

Source: Pennsylvania Human Rights Commission Annual Reports, 2010-2016

Note: For FY 2015 and FY 2016, PHRC only provided docketed cases that corresponded to a protected class, thus explaining the lower totals.

Table IV-2 –PHRC Complaints Closed

Category	2013	2014	2015	2016	Total
Commercial Property	34	8	2	20	64
Education	47	34	30	20	131
Employment	2,247	1,883	1,415	1,113	6,658
Housing Cases	185	228	204	144	761
Public Accommodation	123	123	83	65	394
Total	2,636	2,276	1,734	1,362	8,008

Source: Pennsylvania Human Rights Commission Annual Reports, 2017



PHRC continues to operate its Fair Housing Hotline (1-855-866-5718), which was established in 2013 and refers callers to the appropriate PHRC housing investigator or to the appropriate agency when the call is not related to discrimination. The toll-free hotline has helped ensure faster processing of housing complaints and faster relief to discrimination victims. Additionally, PHRC strives to better promote knowledge of housing rights, particularly among young adults. PHRC has worked with the Fair Housing Rights Center in Southeastern Pennsylvania to develop a short video on fair housing and has been viewed over one (1) million times. This media campaign was funded by the U.S. Department of Housing and Urban Development (HUD).

3. Fair Housing & Equal Opportunity (FHEO-HUD)

The U.S. Department of Housing and Urban Development's (HUD's) Office of Fair Housing & Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Fair Housing Act. From January 1, 2004 to October 22, 2018, 30 fair housing complaints originated within Lehigh County. Attached is a listing for all the FHEO Complaints received and the status or resolution of the complaint.



The fair housing complaints in Lehigh County that were filed with HUD are disaggregated in the following table to illustrate the most common basis of complaints. In Lehigh County, disability (40.7%) was the most common basis for a complaint filed between January 1, 2004 and October 22, 2018, with race (22.2%) and national origin (18.5%) as the second and third most common causes for complaint, respectively. It is important to note that five (5) complaints identified a multiple basis in Lehigh County. The following table compares the frequency of each basis of complaint in the County's CDBG jurisdiction and the County's jurisdiction in addition to Allentown and Bethlehem (which are separate CDBG entitlement communities). Complaints based on disability were the most common in Lehigh County, both including and excluding Allentown and Bethlehem, at 40.7% of complaints and 45.7% of complaints respectively.



The following table entitled "Basis for Housing Complaints" summarizes all of the complaints filed with the HUD Office of Fair Housing & Equal Opportunity between January 1, 2004 and October 22, 2018 in Lehigh County.

**Table IV-3 - Basis for Housing Complaints Between
01/01/2004 to 10/22/2018 for Lehigh County, PA**

Basis	Lehigh County		Lehigh County including Allentown & Bethlehem	
	Count*	% of County Complaints	Count*	% of County Complaints
Race	6	22.2%	24	29.6%
Disability	11	40.7%	37	45.7%
Familial Status	4	14.8%	8	9.9%
National Origin	5	18.5%	18	22.2%
Retaliation	3	11.1%	4	4.9%
Sex	3	11.1%	9	11.1%
Color	0	0.0%	2	2.5%
Religion	2	7.4%	5	6.2%

Source: U.S. Department of HUD-FHEO, Philadelphia Regional Office

**Note: Each complaint may include multiple bases, so the counts do not add up to the total number of complaints*

Based on the previous table, disability was the most common basis for complaints in Lehigh County. This reflects a national trend, where disability has overtaken race as the most common basis for a complaint. Disability complaints make up 40.7% of all complaints filed in Lehigh County, with Race (22.2%) and National Origin (18.5%) as the second- and third-most stated basis. Sex and Retaliation were the fourth- and fifth-most common basis for complaints in the County.

The following table illustrates how complaints were closed. There were twenty-seven (27) complaints filed in Lehigh County from January 1, 2004 through October 22, 2018. However, some complaints had a multiple basis, so the following chart shows thirty-four (34) complaints. Of these, seventeen (17) complaints were closed because of "no



cause” and six (6) were “conciliated/settled.” In other words, over half (67.6%) of all complaints either lacked evidence or were easily settled.

**Table IV-4 - How Complaints Were Closed
in Lehigh County, PA**

Basis	How Closed					
	No Cause	FHAP Judicial Consent Order or Discrimination Found	Conciliated/ Settled	FHAP Judicial Dismissal or No Discrimination Found	Complaint Withdrawn / Failure to Cooperate	Open
Race	4	-	1	-	1	-
Familial Status	1	1	1	-	1	-
Disability	6	-	2	1	2	-
National Origin	2	-	1	1	1	-
Retaliation	2	-	-	-	1	-
Color	-	-	-	-	-	-
Sex	1	-	-	-	2	-
Religion	1	-	1	-	-	-
Total	17	1	6	2	8	-

Source: U.S. Department of HUD-FHEO, Atlanta Regional Office

The following table illustrates the dates complaints were filed in Lehigh County. The largest number of complaints filed with HUD was in 2015.



**Table IV-5 - HUD Date Filed of Complaints
Lehigh County, PA (including Allentown & Bethlehem)**

HUD Date Filed	Lehigh County	
	Count	% of County Complaints
2004	5	6.3
2005	2	2.5
2006	10	12.3%
2007	6	7.4%
2008	8	9.9%
2009	4	4.9%
2010	4	4.9%
2011	7	8.6%
2012	5	6.3%
2013	0	0.0%
2014	6	7.4%
2015	12	14.8%
2016	7	8.6%
2017	4	4.9%
2018	1	1.%

Source: U.S. Department of HUD-FHEO, Atlanta Regional Office



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The following table entitled "HUD-FHEO Complaints" summarizes all of the complaints filed with the HUD Office of Fair Housing & Equal Opportunity between January 1, 2004 and October 22, 2018 in Lehigh County.

Table IV-6 - HUD-FHEO Complaints for Lehigh County, PA

County	HUD Filing Date	Bases	Issues	Closure Reason
Lehigh County	12/21/10	National Origin	Discrimination in terms/conditions/privileges relating to rental	No cause determination
Lehigh County	04/29/11	Disability	Failure to make reasonable accommodation	Conciliation/ settlement successful
Lehigh County	05/12/06	Religion	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination
Lehigh County	02/03/12	National Origin	Discrimination in the selling of residential real property	Dismissed for lack of jurisdiction
Lehigh County	03/24/15	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution
Lehigh County	09/09/09	Disability	Failure to make reasonable accommodation	No cause determination
Lehigh County	02/26/14	Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution
Lehigh County	05/15/06	Disability	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination
Lehigh County	08/15/16	Retaliation	Discriminatory refusal to rent	No cause determination
Lehigh County	03/04/16	Retaliation	Discrimination in terms/conditions/privileges relating to rental	No cause determination
Lehigh County	01/25/08	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination



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Lehigh County	04/27/11	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination
Lehigh County	11/19/12	Race, Disability	Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination
Lehigh County	09/09/11	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination
Lehigh County	10/16/06	Religion	Discrimination in services and facilities relating to rental	Conciliation / settlement successful
Lehigh County	10/13/10	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination
Lehigh County	03/14/12	Disability	Discriminatory financing (includes real estate transactions)	No cause determination
Lehigh County	12/06/04	Race, Sex	Discriminatory refusal to sell and negotiate for sale; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant without resolution
Lehigh County	03/06/18	Race	Discrimination in the making of loans	No cause determination
Lehigh County	07/11/14	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	ALJ consent order entered after issuance of charge
Lehigh County	05/14/14	National Origin	Discriminatory refusal to sell and negotiate for sale; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination
Lehigh County	04/28/15	Race, National Origin, Disability, Familial Status	Discrimination in terms/conditions/privileges relating to sale; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Using ordinances to discriminate in zoning and land use	Conciliation / settlement successful
Lehigh County	12/10/15	National Origin	Discriminatory refusal to rent; False denial or representation of availability – rental	Complainant failed to cooperate
Lehigh County	10/03/16	Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution
Lehigh County	04/01/04	Disability	Discriminatory refusal to sell and negotiate for sale; Discrimination in terms/conditions/privileges relating to sale; Failure to make reasonable accommodation	FHAP judicial dismissal



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Lehigh County	07/20/15	Disability	Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	No cause determination
Lehigh County	10/08/08	Sex	Discriminatory refusal to rent; Discriminatory advertisement - rental; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination

Source: U.S. Department of HUD-FHEO, Philadelphia Regional Office





National Trends

The U.S. Department of Housing and Urban Development (HUD) funds the Office of Fair Housing and Equal Opportunity (FHEO), whose mission is to eliminate discrimination, promote economic opportunity, and achieve diversity. FHEO leads the nation in the enforcement, administration, development, and public understanding of Federal fair housing policies and laws. FHEO enforces laws that protect people from discrimination on the basis of race, color, religion, sex, national origin, disability, and familial status. FHEO releases annual reports to Congress, which provide information regarding complaints received during the particular year. The following table highlights the frequency of such housing complaints for the years of 2014, 2015, 2016, and 2017 organized by basis of complaint.

Table IV-7 – HUD and FHAP Housing Complaints Nationwide

Basis	FY 2014		FY 2015		FY 2016		FY 2017	
	Number of Complaints	% of Total	Number of Complaints	% of Total	Number of Complaints	% of Total	Number of Complaints	% of Total
Disability	4,621	41%	4,605	42%	4,908	45%	4,865	59%
Race	2,383	21%	2,291	21%	2,154	20%	2,132	26%
Familial Status	1,051	9%	1,031	9%	882	8%	871	11%
National Origin	1,067	9%	898	8%	917	8%	834	10%
Sex	879	8%	915	8%	800	7%	826	10%
Religion	223	2%	225	2%	204	2%	800	10%
Color	146	1%	151	1%	143	1%	232	3%
Retaliation	867	8%	832	8%	785	7%	192	2%
Number of Complaints filed	11,237		10,948		10,793		8,186	

Source: HUD FY 2013-2017 Annual Reports on Fair Housing

Note: Complaints often allege more than one (1) basis of discrimination, and each base is counted as a complaint.

The majority of the HUD complaints filed nationwide in 2017 were on the basis of disability, making up 59% of all complaints received. Race



was next, making up 26% of all complaints, followed by familial status at 11%. As illustrated in the next chart, disability has become the most common basis of complaint, partially at the expense of racial complaints.

Chart IV-1 – 5-Year Trends in Bases of Complaints



Source: HUD Enforcement Management Systems (HEMS), FY 2017 FHEO Annual Report

The HUD housing complaints filed in Lehigh County were primarily based on disability and national origin, which are consistently the most common causes for complaints across the nation as illustrated in the previous chart. Note: the percentages for each year do not equal 100% and the number of complaints each year do not equal the total complaints across all areas. This is because there is often more than one basis for the filing of a fair housing complaint.

4. North Penn Legal Services

North Penn Legal Services (NPLS) is a nonprofit organization providing civil legal aid to low-income residents of Northeastern Pennsylvania. The organization provides legal assistance so that people can understand their rights. Free legal representation in non-criminal matters such as eviction from housing, discrimination, family law, and consumer protection issues are also provided. Lehigh County annually



funds North Penn Legal Services through the County's Affordable Housing Trust Fund (AHTF).

Additionally, NPLS is a sub-recipient of CDBG funds from Lehigh County, funded as a public service activity to provide legal aid related to affordable housing. NPLS serves low- and moderate-income residents living in Lehigh County outside of Allentown and Bethlehem by providing assistance to residents who face eviction, who may be denied housing, or who are forced to live in substandard conditions.

In addition, NPLS monitors housing practices and counsels victims of discrimination. NPLS policies and activities promote the awareness of fair housing requirements and provide consultation to developers and municipalities to ensure that rental and for sale units are marketed in accordance with the affirmative marketing rules of the U.S. Department of Housing and Urban Development. NPLS ensures that all housing programs and services provided by Lehigh County, its municipalities, and NPLS itself, are administered in a way that promotes fair housing without regard to race, national origin, religion, gender, disability, and familial status.

- North Penn Legal Services
559 Main Street, Suite 200
Bethlehem, PA 18018
610-317-8757
610-317-5322 (Local Fair Housing Discrimination Line)
www.northpennlegal.org

5. Housing Equality Center of Pennsylvania

The Housing Equality Center of Pennsylvania offers a variety of programs and services to the general public to ensure that consumers have access to housing and understand their rights under fair housing laws. The organization provides victims of discrimination with legal help, performs testing to determine the existence of discrimination, educates the public, consults with and trains housing providers, and works with housing and related service providers to ensure compliance with anti-discrimination laws. The Housing Equality Center distributes literature and guidelines, including:





- Fair Housing Guide for Consumers
- Fair Housing Guide for Landlords and Property Managers
- Fair Housing Guide for People with Disabilities
- Fair Housing Act - Know Your Responsibilities
- Fair Housing Review - Immigration Status
- Fair Housing Review - Homeowners Insurance
- Fair Housing Review - Families with Children
- Fair Housing Review - New Construction Accessibility Requirements
- Fair Housing Review - Zoning and Land Use Issues
- Fair Housing Review - Assistance Animals

Copies of these documents were distributed at Lehigh County's 2018 Regional Housing Summit ("A Home for Everyone") on February 8, 2018.

- Housing Equality Center
P.O. Box 558
Fort Washington, PA 19034
267-419-8918
866-540-FAIR
info@equalhousing.org

6. Housing and Human Services Agencies

Lehigh County interviewed agencies offering housing and human services within the County to obtain their input and gain insight into potential impediments to fair housing. The following agencies participated in the information gathering through roundtable discussions, individual meetings, phone interviews, or through surveys:

- Allentown Housing Authority
- Casa Guadalupe
- Catholic Charities
- Center for Vision Loss
- Communities in Schools of the Lehigh Valley
- Community Action Committee of Lehigh Valley
- Fulton Mortgage Company
- Greater Lehigh Valley Realtors
- Habitat for Humanity
- Hispanic American Organization



- Housing Association Development Corporation
- Housing Equality Center
- Lehigh and Northampton Transportation (LANta)
- Lehigh Career and Technical Institute
- Lehigh County Community College
- Lehigh County Conference of Churches
- Lehigh Valley Center for Independent Living
- Lehigh Valley Community Land Trust
- Lehigh Valley Partnership for a Disability Friendly Community
- Lehigh Valley Planning Commission
- Neighborhood Housing Services of the Lehigh Valley
- New Bethany Ministries
- North Penn Legal Services
- Salvation Army
- The Literacy Center
- Turning Point Lehigh Valley
- Valley Youth House and Coordinated Entry Referral System

Each of these agencies provided feedback on their experience with housing-related issues in Lehigh County. Complete summaries of meeting comments can be found in Appendix A. Below is a list of key points from each of the meetings.

Housing Issues

- There appears to be a lack of affordable housing in Lehigh County.
- There appears to be a lack of accessible housing in Lehigh County.
- The sales price of housing is going up because of demand and lack of supply.
- There are limited developable sites for new housing sites in the County.
- There is a need to develop affordable housing in conjunction with the development of new distribution and warehouse centers.
- New economic development with job opportunities are occurring in the County.



- With the shortage of affordable rental housing, it is suspected that some voucher holders are paying landlords extra money to rent their units.
- The County housing stock is older, and the cost of rehabilitation is higher than the value of the housing, even after the rehabilitation work is completed.
- The Comprehensive Housing Affordability Strategy (CHAS) data through HUD shows that over 27% of owners and 50.5% of renters are cost overburdened in the County.
- Pre- and post-purchase housing counseling is needed to help expand homeownership opportunities.
- Transitional Housing is at a premium in the County due to cuts in governmental funding.

Social Services

- There are numerous social service programs provided in the County.
- Day care centers need to be developed close to the employment centers.
- Additional services are needed to assist the non-English speaking residents who are moving into the County.
- Fair housing complaints are occurring with the disabled population which need to be addressed.
- Increased funding for utility payments are needed for tenants who have economic problems.
- With the reduction in Federal funds, there is a need for additional services to support the homeless population and at-risk homeless.
- There is a need for more accommodations for victims of domestic violence.
- Additional services are needed for youth who are coming out of foster care placement.
- Additional support services are needed for persons coming out of institutions including: hospitalization, correctional, and mental health.



Public Policies

- Local zoning ordinances are consistently being revised and assistance is available to bring them into compliance with ADA and the Fair Housing Act.
- There is a continuing need for education and training on tenant's rights and landlord's responsibilities under the Fair Housing Act.
- Local municipalities have to review plans for new multi-family housing for conformance with the ADA requirements for accessibility.
- Source of income is not a protected class in Lehigh County, nor Allentown, Bethlehem, or Easton.
- Affordable housing needs to be dispersed throughout the County and not just within the urban core.
- A Regional Housing Summit is being planned to discuss the need and location for affordable workforce housing.
- There is a growing Hispanic and immigrant population which is creating a greater need for language and supportive services.
- Communities outside Allentown have lower density zoning and less apartment complexes.
- Per the Lehigh Valley Planning Commission's 2014 Regional Housing Plan, the Lehigh Valley's population is expected to increase by almost 230,000 residents over the next 30 years. With the population anticipated to grow to approximately 874,000 people in the next 30 years, there is a lack of housing to meet that demand.
- There is a need to provide incentives to developers and businesses to create and provide affordable housing.

Transportation

- There is a multi-million-dollar expansion at the Lehigh Valley International Airport to support new growth and economic development in the County.
- There is a need for more bus routes to centers of employment.
- New companies need to partner with LANta to develop increased transportation service for their employees.
- Paratransit service is provided by LANta and the Independence Transportation Network.



- Additional transportation links need to be developed in areas that are not served, or underserved in the County.
- LANta is willing to consider adding new bus routes, but it needs the riders to support those routes.

Economic Development

- There are areas of economic opportunity in northern South Whitehall Township and Upper Macungie Township (Town of Fogelsville and Town of Trexlertown).
- The new Fed Ex Center and other distribution centers in the region will bring new jobs into the County.
- Upper Saucon Township, Lower Macungie Township, and Macungie Borough are areas of opportunity for new growth in the County.
- There are numerous job opportunities in the trucking industry and there are training programs available.
- New companies need to invest in their employees by assisting with transportation and development of new housing.



B. Public Sector

Part of the Analysis of Impediments is to examine the public policies of the jurisdiction and the impact on fair housing choice. The Local governments control land use and development through their comprehensive plans, zoning ordinances, subdivision regulations, and other laws and ordinances passed by the local governing body. These regulations and ordinances govern the types of housing that may be constructed, the density of housing, and various residential uses in a community. Local officials determine the community's commitment to housing goals and objectives. The local policies therefore determine if fair housing is to be promoted or passively tolerated.

This section of the Analysis of Impediments evaluates the County's policies to determine if there is a commitment to affirmatively further fair housing.

1. CDBG Program

Lehigh County annually receives from HUD approximately \$1,200,000 in CDBG funds. The County allocates its funds to public facility improvements, housing rehabilitation, slums and blight removal, administration, and public services.

In particular, the County proposed to allocate FY 2018 CDBG funds as outlined in the following table to affirmatively further fair housing. Lehigh County anticipates a reduction in the annual CDBG allocation in the coming years as a result of further cuts in the Federal budget.

Table IV-8 - FY 2018 CDBG Allocation for Lehigh County, PA

Community Development Block Grant Program (CDBG)	
CDBG Administration	\$ 245,439
Public Facilities Improvements	\$ 329,035
Housing Rehabilitation	\$ 408,460
Slums and Blight Clearance	\$ 100,000
Public Services	\$ 144,262
Total:	\$ 1,227,196



Lehigh County allocates funds from its Affordable Housing Trust Fund (AHTF) to encourage affordable housing development throughout the County. 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 the AHTF.

In its FY 2009-2013 Five Year Consolidated Plan, Lehigh County identified several goals to prioritize funding and address housing needs during this five-year period, as outlined in the following table:

Table IV-9 – Lehigh County, PA - Five Year Objectives

Housing Goals
Retain Existing Housing Stock Development of Affordable Housing Homebuyer's Assistance
Homeless Goals
Homelessness Prevention Services and Care Shelter and Transitional Housing Permanent Housing Non-Homeless Special Needs
Non-Housing Community Development Goals
Public Facilities and Infrastructure Economic Development Public Services

The following attached maps illustrate the locations of CDBG funded activities:

- CDBG Activities Funding, Page 127
- CDBG Acquisition Activities, Page 128
- CDBG Housing Activities, Page 129
- CDBG Public Improvement Activities, Page 130

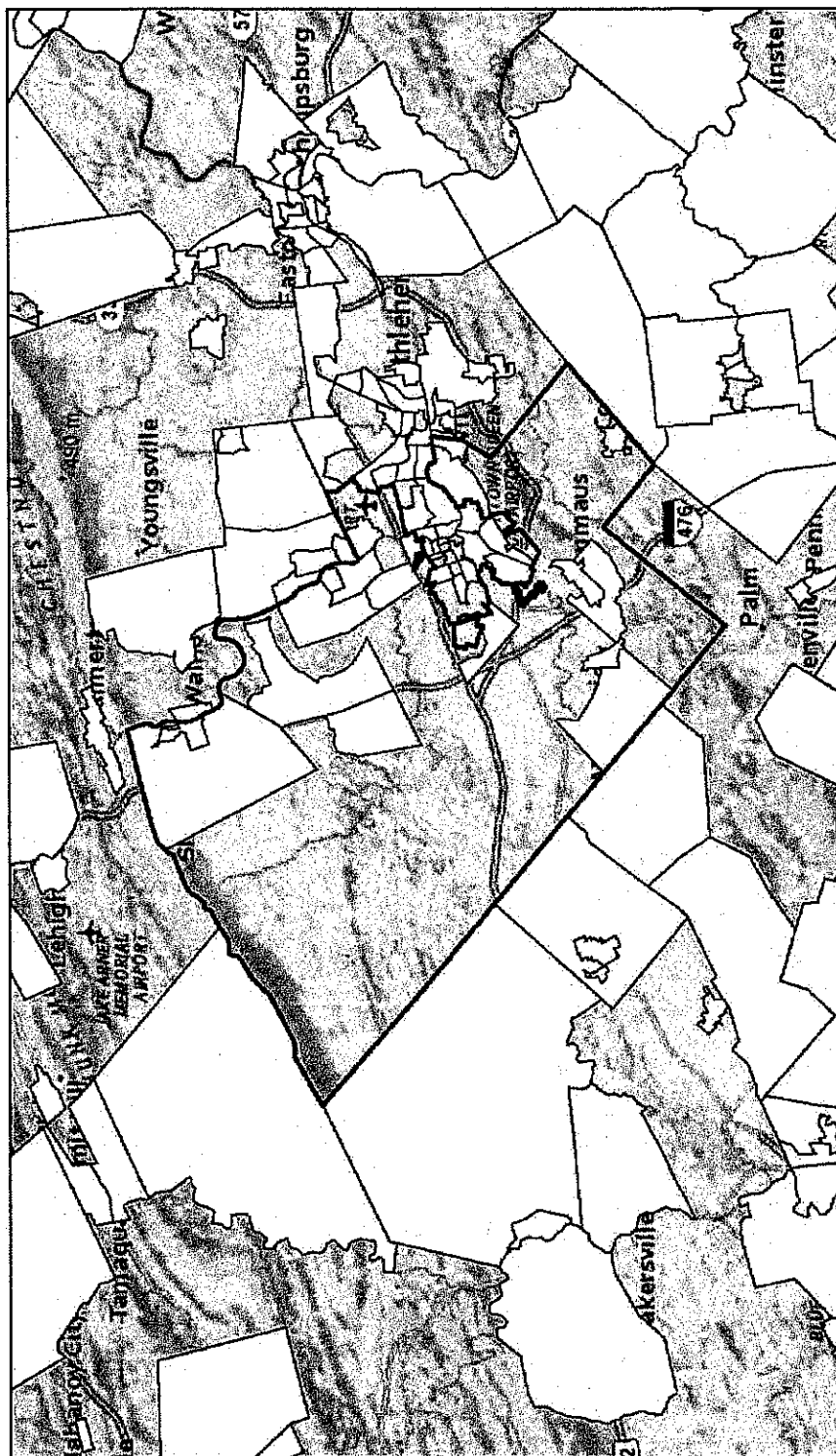


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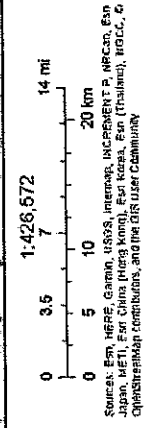
- CDBG Public Service Activities, Page 131
- CDBG All Activities, Page 132





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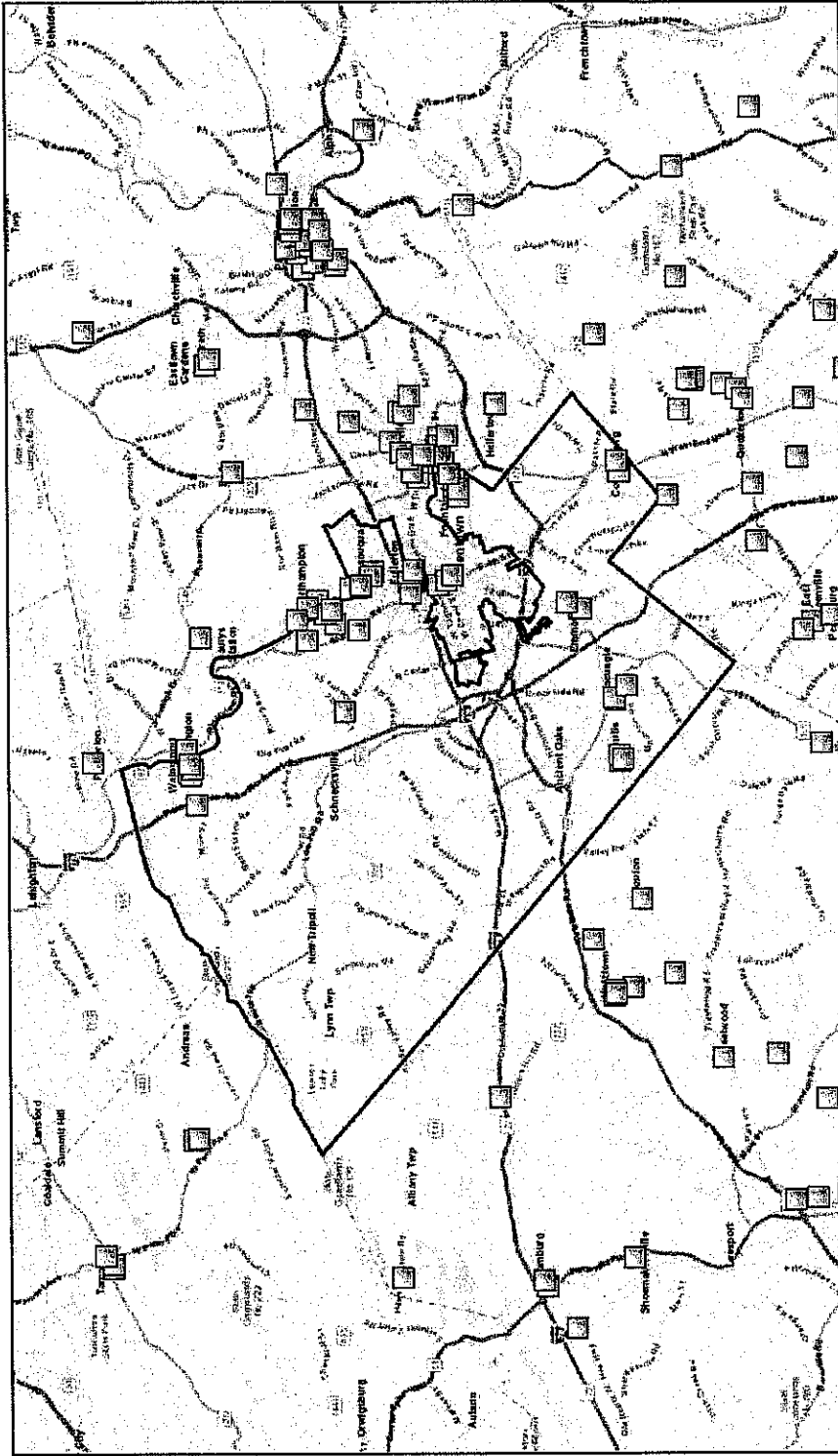
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 **CDBG Activity (Public Services)**


Override 1



CDBG Public Improvement Activities - Lehigh County, PA



October 18, 2018

 CDBG Activity (Public Improvements)

 Override 1

Note: Public Improvement Activities also took place outside Lehigh County.

1:426,572

0 3.5 7 14 mi

0 5 10 20 km

SOURCE: ESRI, HERE, Garmin, USGS, Intermap, INCREMENT P, AIRCRAFT, Earthstar, ENR, IGN, IGN, Esri, DigitalGlobe, GeoEye, Earthstar (United States), Swire, NOAA, GEBCO, USGS, AeroGRID, IGN, Esri, Mapbox, OpenStreetMap contributors, and the GIS User Community

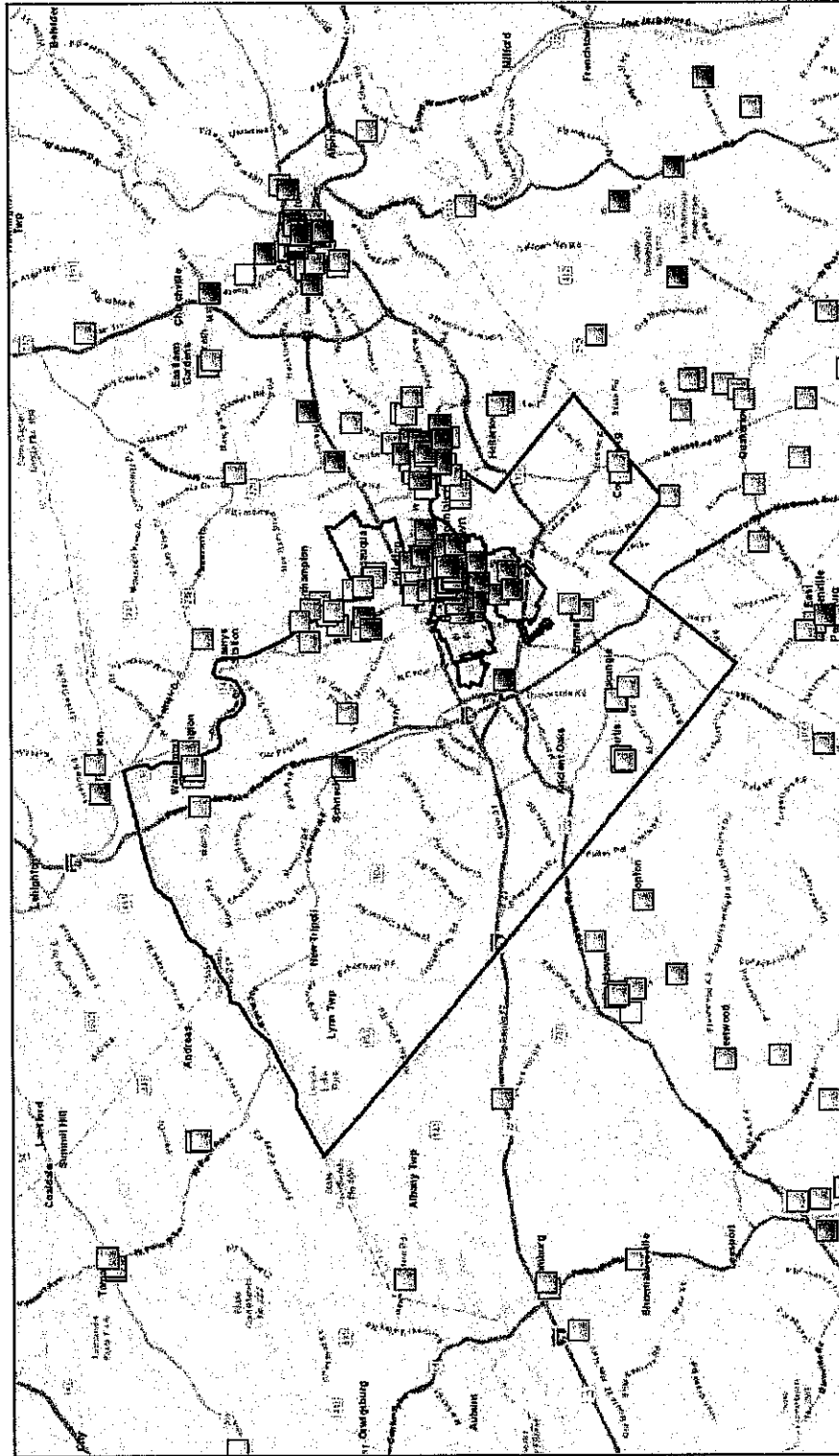


2018 Analysis of Impediments to Fair Housing

Impediments to Fair Housing 2018



All CDBG Activities - Lehigh County, PA



October 18, 2018

Override 1

- CDBG Activity (Other)
- CDBG Activity (Public Services)
- CDBG Activity (Public Improvements)
- CDBG Activity (Housing)
- CDBG Activity (Economic Development)
- CDBG Activity (Acquisition)

1:426,572

0 3.5 7 14 mi

0 5 10 20 km

Source: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Swisstopo, Esri (Taiwan), NSIC, © OpenStreetMap contributors, and the GIS User Community



2. Continuum of Care (CoC)

The PA Eastern CoC serves a total of thirty-three (33) counties. The 33 counties are organized into five (5) geographically dispersed Regional Homeless Advisory Boards (RHABs). Lehigh County is part of the Lehigh Valley Regional Homeless Advisory Board (LV-RHAB). The Lehigh Valley RHAB is comprised of Lehigh and Northampton Counties and is made up of forty (40) agencies and organizations in the Lehigh Valley. Members are representatives of:

- Governmental, public and/or private entities (including faith-based providing housing or support services in the region)
- Business community
- Educational institutions
- Health care organizations
- Homeless individuals
- Law enforcement
- Banks
- Other organizations that possess needed skills interest or resources which will support the mission.

The Lehigh Valley RHAB combines evidence-based solutions and recommendations from national partners with local community knowledge to end homelessness in the community while also fostering collaboration between service providers and mainstream and community resources.

According to the Governance Charter for the PA Eastern Continuum of Care Collaborative, the mission of the PA Eastern CoC is to end homelessness throughout the 33-county Continuum of Care. The CoC works toward ending homelessness by providing a framework for a comprehensive and well-coordinated regional and local planning process. This included identifying needs, conducting a system-wide evaluation of existing resources and program activities, and building a system of housing and services that addresses those needs. This mission was pursued through the development of long-range plans to prevent and end homelessness in the geographic area, as well as the coordination necessary for successful implementation. The objectives of the CoC included the following:



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

3. Lehigh County Housing Authority –

The Lehigh County Housing Authority (LCHA) was established in 1970 and is governed under the U.S. Housing Act of 1937 as amended, and the Housing Authorities Law of the Commonwealth of Pennsylvania.

Lehigh County Housing Authority
635 Broad Street
Emmaus, PA 18049
(610) 965-9820 (Voice)
<http://www.lehighcountyha.org>

The Lehigh County Housing Authority is recognized as a public body corporate and a "Public Housing Authority" of the U.S. Department of Housing and Urban Development and the Commonwealth of Pennsylvania. The Housing Authority is governed by a five (5) member Board of Commissioners and everyday operations are handled by an Executive Director and Deputy Executive Director.

LCHA maintains 289 units of public housing and has a 98% occupancy rate. Through various funding programs, LCHA has a total of more than 500 apartments of subsidized and affordable housing that it maintains. The public housing waiting list contains 1,477 applications, of which 591 are from seniors and 886 are from families. The public housing waiting lists for both elderly and family units were opened on November 26, 2017 and have remained open since that time. The Family Public Housing list has limited criteria to be eligible to apply.

Public Housing units are available for anyone that meets income and program eligibility requirements regardless of age, unless otherwise noted. Eligible applicants may select the actual development where they choose to be housed. Once an applicant reaches the top of the waitlist with their file complete, they will be offered the next available unit according to the bedroom size requirements of their family. Once eligibility is determined, the next available unit is offered to the next



certified eligible applicant by required bedroom size. If the unit is refused, the applicant's name will either be moved to the bottom of the list or removed from the list, based on the applicant's choice.

The application process involves two (2) phases. The first is the "initial" application for assistance, which results in a family's placement on the waiting list. The second phase is the "final determination of eligibility," which takes place when the family reaches the top of the waiting list.

To ensure that the residency preference is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a), the Lehigh County Housing Authority reviews its waiting lists to determine if adequate, equal representation for each demographic is represented. Furthermore, LCHA will annually review its waitlist and list of current residents to determine if a local demographic mix is reasonably represented. If not, LCHA will enhance marketing efforts through channels targeted to groups who are least likely to apply.

LCHA staff frequently receives training that has been offered by various agencies, including from State and HUD agencies. LCHA recently received Fair Housing Training, including ADA and Section 504 training, from North Penn Legal Services (NPLS). NPLS funded the training through a HUD grant.

The Lehigh County Housing Authority has resident advisory boards from its public housing communities, which serve as representatives to review the LCHA Annual Action Plan every year. The LCHA senior citizen developments in both Emmaus and Slatington Boroughs have active resident advisory boards that focus on social programs in their respective communities.

Public Housing –

The Lehigh County Housing Authority (LCHA) aims to address the needs of the extremely low-income, very low-income, and low-income residents of Lehigh County. The mission of LCHA is to provide affordable housing in the most efficient and effective manner to qualified individuals in accordance with the rules and regulations prescribed by the U.S. Department of Housing and Urban Development, the Commonwealth of Pennsylvania, the County of



Lehigh, and/or any other entity providing funding for its affordable housing programs.

HUD provides funding to the Lehigh County Housing Authority through its Housing Choice Voucher Program. LCHA owns and manages 766 apartments of subsidized and affordable housing. Additionally, LCHA administers a Family Self Sufficiency Program that offers families an opportunity to participate in a program that provides them opportunity to work with a caseworker to develop a plan to gain access to education and job programs.

Table IV-10 – Lehigh County Housing – Public Housing

Address	Owner/Manager	Units
5 N. 7 th Street, Slatington, PA 18080	Lehigh County Housing Authority	25
425 Kuntz Street, Slatington, PA 18080	Lehigh County Housing Authority	75
10-11 N. Front Street 28 S. Front Street 257 S. Second Street, Coplay, PA 180367	Lehigh County Housing Authority	25
333 Ridge Street, Emmaus, PA 18049	Lehigh County Housing Authority	75
1101 Seneca Street, Bethlehem, PA 18015	Lehigh County Housing Authority	75
960 Cherokee Street 910-12 Delaware Avenue Bethlehem, PA 18015	Lehigh County Housing Authority	14

Source: Lehigh County Housing Authority

Table IV-11 – Lehigh County Housing – Subsidized Housing

Address	Owner/Manager	Units
137 Front Street, Catasauqua, PA 18032	Lehigh County Housing Authority	10
101 W Main Street, Macungie, PA 18062	Lehigh County Housing Authority	34

Source: Lehigh County Housing Authority

The following table shows the affordable housing units that are for elderly persons that meet income restrictions. While the rent is not



subsidized, they are operated and managed by the Lehigh County Housing Authority.

Table IV-12 – Lehigh County Housing – Affordable Housing

Address	Owner/Manager	Units
118 Bridge Street, Catasauqua, PA 18037	Lehigh County Housing Authority	36
4234 Dorney Park Road, Allentown, PA 18103	Lehigh County Housing Authority	50
401 E. State Street, Coopersburg, PA 18036	Lehigh County Housing Authority	40
331 E. State Street, Coopersburg, PA 18036	Lehigh County Housing Authority	41
1102 Eaton Avenue, Bethlehem, PA 18018	Lehigh County Housing Authority	50
1029 6 th Street, Whitehall Township, PA 18052	Lehigh County Housing Authority	48
950 N. Front Street, Hellertown, PA 18055	Lehigh County Housing Authority	47
22 Locust Street, Macungie, PA 18062	Lehigh County Housing Authority	17
1801 Newport Avenue, Northampton, PA 18067	Lehigh County Housing Authority	34
1400 Main Street, Catasauqua, PA 18032	Lehigh County Housing Authority	40
120 N. Third Street, Emmaus, PA 18049	Lehigh County Housing Authority	30

Source: Lehigh County Housing Authority

Section 8 –

The Lehigh County Housing Authority oversees the Section 8 Housing Choice Voucher Program. Eligible participants who receive vouchers may search for their own privately owned housing. The Housing Authority encourages voucher holders to locate in areas of high opportunity and outside R/ECAPs. Note that there are no R/ECAPs in Lehigh County outside of the City of Allentown, which is a separate Federal entitlement community from Lehigh County. Additionally, Family Self-Sufficiency (FSS) programs are provided to Section 8



Housing Choice Voucher holders and public housing tenants. FSS program residents work with a case manager to develop goals that will, over a five (5) year period, lead to self-sufficiency. These goals may include education, specialized training, job readiness, job placement activities, and career advancement objectives. The goals for each participating family member are set out in Individual's Training and Service Plan. LCHA has a baseline of 1,652 Section 8 Housing Choice Vouchers, with 1,243 applications on the waiting list as of September, 2018.

There are five (5) Section 8 Project-Based developments located in the County:

- Zephyr Apartments/Coplay Apartments: 43 units, of which: 80% White, 11% Black, 9% Hispanic
- Catasauqua Towers: 75 units, of which: 77% White, 5% Black, 16% Hispanic, 1% Asian
- Mountain View Apartments: 20 units, of which 79% White, 2% Black, 17% Hispanic, 2% Asian
- Catasauqua Apartments: 10 units, of which 73% White; 25% Black; 1% Native American Indian; 1% Native Hawaiian/Pacific Islander
- Strawberry Patch Apartments: 50 units, of which 90% White, 6% Black, 4% Hispanic

When comparing the four developments with racial data, the percentages fluctuate. The Zephyr Apartments, Catasauqua Towers, and Mountain View Apartments are between 77%-80% White, the Strawberry Patch Apartments are 90% White. Additionally, Catasauqua Apartments and Mountain View Apartments have a higher Hispanic population (16% and 17% respectively) and a lower Black population. The differences between the Public Housing units and the Project-Based Section 8 units are minimal. Of these five (5) developments, LCHA only owns Catasauqua Apartments.

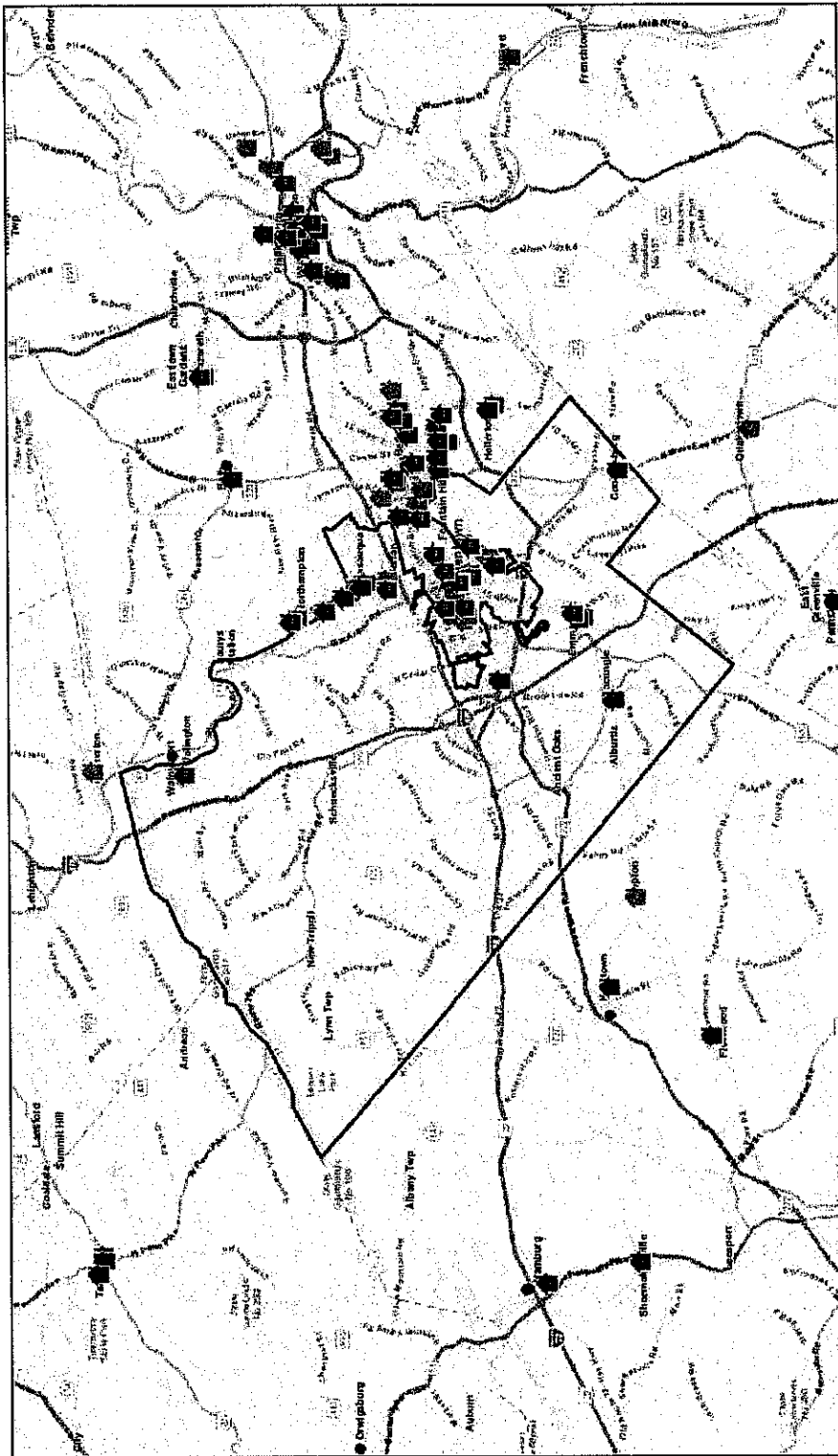
The following map illustrates all HUD multifamily properties in and around Lehigh County.



2018 Analysis of Impediments to Fair Housing
Impediments to Fair Housing 2018



HUD Housing - Lehigh County, PA



October 18, 2018

- USDA Rural Housing
- Multifamily Properties - Assisted
- Public Housing Development
- LIHTC Property
- Override 1

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

Sources: Esri, News, Google, USGS, Intermap, Inc., GEBCO, Esri, Japan, METI, Esri, China (Hong Kong), Esri, Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community



4. Family Self-Sufficiency (FSS) –

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

Family Self-Sufficiency (FSS) programs are provided to Housing Choice Voucher holders and public housing tenants to transition from welfare to work or better paying jobs. The Head of Household works with FSS staff to create a five-year plan, which lists steps they will take to pursue economic stability for their family. The plan includes goals to seek and maintain employment and become free of any welfare (cash) assistance received. Throughout the program, FSS staff helps families access government and community programs and services for financial aid, career training, job search, childcare, transportation, counseling, budgeting, credit repair, and even homeownership.

As the family progresses in their program, any rent increases caused by increases in salary, better jobs, or wages are deposited in an FSS savings account. At the end of five years, when the Head of Household completes their FSS goals and "graduates," they are eligible to receive money collected in this account. Past participants in FSS have returned to school, obtained living wage jobs, improved credit and finances, purchased vehicles, started businesses, and bought homes of their choice. Their futures become more secure as they build assets.

As of November, 2018, there were 25 families participating in the FSS program, with 4 families having graduated, and all were Section 8 voucher holders. In addition, there was a Family Savings Account program which was available to residents who participate in the FSS Program. This program enables families to save funds to help with larger purchases, such as education or homeownership. Current Lehigh County Housing Authority tenants with the Housing Choice



Voucher program or the Public Housing program are eligible to participate in the Family Self-Sufficiency program. Lehigh County Housing Authority (LCHA), the County of Lehigh, and Lehigh Career & Technical Institute (LCTI), partner in improving the Section 3 eligible program participants' access to education and job training. The Housing Authority has previously partnered with Lehigh County and PA CareerLink to offer scholarships to eligible individuals wishing to participate in training offered by LCTI.

5. Low Income Housing Tax Credit –

The Low-Income Housing Tax Credit (LIHTC) Program was created under the Tax Reform Act of 1986 and is intended to attract private investment to develop affordable rental housing for low- and moderate-income households. This program provides a dollar-for-dollar tax credit to reduce the developer's Federal income tax. Lehigh County promotes the use of Low Income Housing Tax Credits. The following table shows LIHTC projects completed in Lehigh County since 2000. Note that only three (3) projects (highlighted in blue) were completed in Lehigh County outside the Cities of Allentown and Bethlehem.

Table IV-13 - Lehigh County, PA LIHTC Projects

Project Name / HUD ID Number	Project Address	Project City	Project ZIP Code	Total Number of Units	Total Low- Income Units
Coopersburg Apartments II PAA20000035	401 E State St	Coopersburg	18036	41	41
Locust St Apartments PAA20010100	22 Locust St	Macungie	18062	17	17
Lexies Dream PAA20020065	1609 Schoenersville Rd	Bethlehem	18018	15	15
Parkview at Bethlehem PAA20020110	1241 Club Ave	Bethlehem	18018	115	115
Schoenersville Apartments PAA20020125	1547 Schoenersville Rd	Bethlehem	18018	40	40
Cedar Street Apartments PAA20030040	25 Cedar St	Macungie	18062	19	19
Hart Rental Phase I PAA20070070	E Linden St Hanover Ave	Allentown	-	80	80



Hart Rental Phase II PAA20070075	445 Hanover Ave	Allentown	18109	79	79
Hart Phase 2A PAA20080080	445 Hanover Ave	Allentown	18109	60	60
Cumberland Gardens Phase II PAA20142004	Scattered Sites	Allentown	18103	70	70
Cumberland Gardens Phase III PAA20151002	Scattered Sites	Allentown	18103	56	56

Source: <http://lihtc.huduser.org/>

The following table provides the number of residents in publicly support housing units, and the percentage identified as white, black, or Hispanic.

Table IV-14 - Lehigh County, PA Publicly Supported Housing Residents

Housing Type	White		Black		Hispanic	
	#	%	#	%	#	%
Public Housing	209	75.72%	19	6.88%	46	16.67%
Project-Based Section 8	168	84.42%	9	4.52%	22	11.06%
Other Multifamily	0	N/A	0	0.00%	0	N/A
HCV Program	524	67.79%	73	9.44%	169	21.86%

Source: <https://legis.hud.gov/affht/>

The following table provides detailed percentage of racial data by housing type.

Table IV-15 – Lehigh County Housing Authority
Demographics and Marketing Area

Demographic Characteristics	Project's Residents	Project's Applicant Data	Census Tract	Housing Market Area	Expanded Housing Market Area
White	64.0%	65.0%	71.6%	0.00%	0.00%
Black or African American	36.0%	35.0%	6.1%	0.00%	0.00%
Hispanic or Latino	0.0%	25.0%	18.8%	0.00%	0.00%
Asian	0.0%	0.0%	2.9%	0.00%	0.00%



2018 Analysis of Impediments to Fair Housing



Impediments to Fair Housing 2018

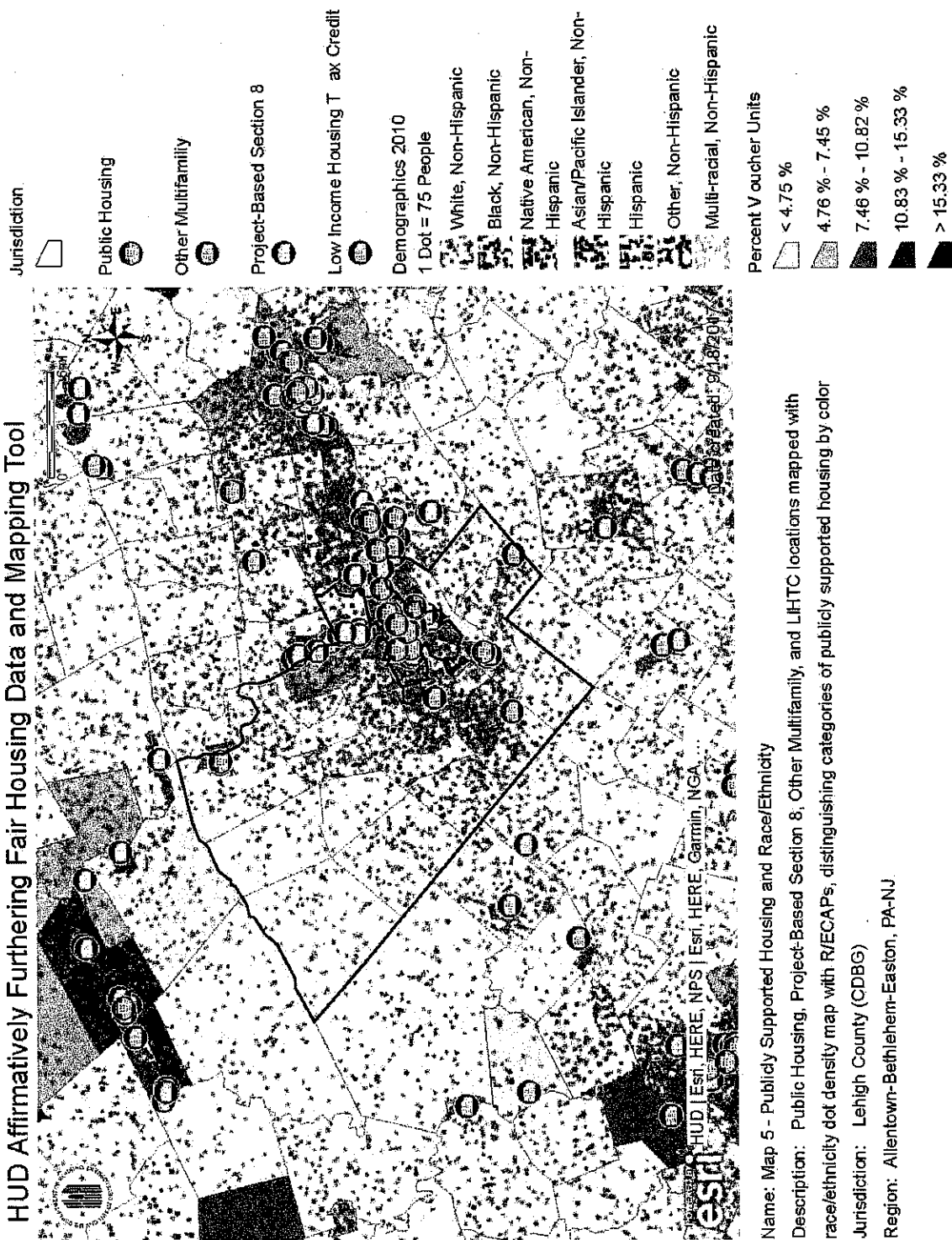
American Indian or Alaskan Native	0.0%	0.0%	0.4%	0.00%	0.00%
Native Hawaiian or Pacific Islander	0.0%	0.0%	0.2%	0.00%	0.00%
Persons with Disabilities	0.0%	0.0%	0.0%	0.00%	0.00%
Families with Children under the age of 18	70.0%	0.0%	30.6%	0.00%	0.00%

Source: Lehigh County Housing Authority Affirmative Fair Housing Marketing Plan

The following map illustrates all HUD properties in Lehigh County and the surrounding area overlaid by race.



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool





Per the HUD AFFH Tool illustrated on the previous page, the racial makeup of all public housing is available on both the County and regional level. Table IV-16 (below) presents persons occupying the four categories of publicly supported housing by race/ethnicity. The four types of public housing are:

- Public Housing
- Section 8 Project-Based Rental Assistance (PBRA)
- Housing Choice Voucher (HCV) Program
- Other Assisted Housing

The White racial group makes up the largest cohort of tenants in public housing (75.72%), Section 8 Project Based Housing (84.42%), and Housing Choice Vouchers (67.79%). The Hispanic population is the second-most populous, accounting for 16.67% of public housing; 11.06% of Section 8 Project-Based housing; and 21.86% of Housing Choice Vouchers. The Black/African-American racial cohort makes up 6.88% of public housing; 4.52% of Section 8 Project-Based housing; and 9.44% of the Housing Choice Voucher program.

When comparing these rates to the overall population makeup of Lehigh County, it can be determined which racial cohorts are over- or under-represented in public housing. While the Hispanic population makes up 5.82% of the County's population, it occupies 16.67% of public housing, 11.06% of Section 8 housing, and 21.86% of Housing Choice Vouchers. The Black/African-American population makes up 2.42% of the County's population, but occupies 6.88% of public housing, 4.52% of Section 8, and 9.44% of HCV. Populations that are slightly underrepresented in publicly supported housing include the White population and the Asian or Pacific Islander population.

Table IV-16 – Publicly Supported Housing

Race/Ethnicity	Public Housing	Project-Based Section 8	Other Multifamily	Housing Choice Voucher
White	75.72%	84.42%	0.00%	67.79%
Black/African-American	6.88%	4.52%	0.00%	9.44%
Hispanic	16.67%	11.06%	0.00%	21.86%
Asian or Pacific Islander	0.36%	0.00%	0.00%	0.78%

Source: HUD AFFH Tool



Tables IV-16 and IV-17 provide data on both the County and MSA levels, allowing a comparison of the makeup of publicly supported housing. In the Allentown-Bethlehem-Easton PA-NJ MSA, the White racial group comprises 78.64% of the population. However, this racial cohort only makes up 30.26% of public housing; 64.58% of Section 8 Project-Based housing; 54.84% of Other Multifamily; and 53.96% of Housing Choice Voucher units. Additionally, the Asian or Pacific Islander population makes up 2.48% of the region's population, but makes up less than 1% of all publicly supported housing.

Similar to the case in Lehigh County, the Hispanic and Black/African-American populations make up a greater percentage of publicly supported housing than their respective percentages of the general population. While Hispanics comprise 12.98% of the Allentown-Bethlehem-Easton PA-NJ MSA, they make up 58.48% of public housing, 29.99% of Project-Based Section 8, 25.81% of multifamily, and 31.35% of Housing Choice Voucher units. The Black/African-American population makes up 4.25% of the MSA's population, but occupies 10.70% of public housing, 19.35% of multifamily, and 14.39% of Housing Choice Voucher units.

**Table IV-17 – Publicly Supported Housing –
Allentown-Bethlehem-Easton PA-NJ MSA**

Race/Ethnicity	Public Housing	Project-Based Section 8	Other Multifamily	Housing Choice Voucher
White	30.26%	64.58%	54.84%	53.96%
Black/African-American	10.70%	4.38%	19.35%	14.39%
Hispanic	58.48%	29.99%	25.81%	31.35%
Asian or Pacific Islander	0.44%	0.92%	0.00%	0.24%

Source: HUD AFFH Tool

Lehigh County and LCHA compared the demographics of residents of each program category of publicly supported housing to the population in general to determine if there is a higher or lower proportion of groups based on protected class.

**Table IV-18 – Publicly Supported Housing and Income**

Race/Ethnicity	Lehigh County	0-80% AMI	% Total Publicly Supported Housing Units
White	86.85%	76.61%	72.31%
Black/African-American	2.42%	3.13%	8.11%
Hispanic	5.82%	5.64%	19.02%
Asian or Pacific Islander	3.46%	2.45%	0.56%

Source: HUD AFFH Tool

Data from Table IV-18 provides information for further analysis of publicly supported housing in the County. While the White population makes up 86.85% of the population, it makes up 76.61% of the income-eligible population. The Black/African-American population comprises 2.42% of the County's population, but 3.13% of the income-eligible population. The Hispanic population has a similar percentage of Lehigh County's and the income-eligible populations, making up 5.82% and 5.64%, respectively. Comparing the publicly supported housing population with the income-eligible population provides a more accurate assessment.

6. HUD Assisted Housing –

HUD previously funded the Section 202 and Section 811 Supportive Housing programs to encourage and support the development of assisted housing in cities and counties across the country. The Section 202 Supportive Housing for the Elderly Program provided financial support for the construction, rehabilitation, or acquisition of supportive housing for the elderly. Similarly, the Section 811 Supportive Housing for the Disabled provided financial assistance for nonprofit organizations seeking to develop affordable, supportive housing for low-income adults with disabilities. Lehigh County and the Lehigh County Housing Authority are supportive of the use of Section 202 and Section 811 Supporting Housing Programs as well as the use of Low Income Housing Tax Credits (LIHTC).



7. Social Service Agencies –

The following table lists the organizations for the at-risk, homeless, or disabled populations in Lehigh County.

Table IV-19 – Supportive Service Programs

Agency Name	Description
Casa Guadalupe	Casa Guadalupe is a community based organization offering services for children, youth, adults, and the elderly, primarily Latino residents in the areas of health, education, and social services.
Catholic Charities of Diocese of Allentown	Catholic Charities offers services to people residing within Berks, Carbon, Lehigh, Northampton, or Schuylkill Counties who need support, care, and compassion.
Center for Vision Loss	The Center for Vision Loss provides support, skills, education, and rehabilitation services for people with vision loss and promotes visual health and safety for children and adults.
Communities in Schools of the Lehigh Valley	Communities In Schools aims to help students achieve their greatest successes through determining students' needs and establish relationships with local businesses, social service agencies, health care providers, and parent and volunteer organizations to provide needed resources.
Community Action Committee of Lehigh Valley	CACLV seeks to improve the quality of life by building a community in which all people have access to economic opportunity, the ability to pursue that opportunity, and a voice in the decisions that affect their lives.
Habitat for Humanity of the Lehigh Valley	Habitat for Humanity of the Lehigh Valley is made up of volunteers that work to build simple, decent homes for hardworking, disadvantaged families in the Lehigh Valley.
Hispanic American Organization	The Hispanic American Organization strives to improve the quality of life of Hispanic families by helping them become more economically self-sufficient through better health, education, communication, and technology skills.
Housing Association Development Corporation	The Housing Association and Development Corporation works to revitalize neighborhoods through the development of affordable housing, the provision of employment and job training, and the pursuit of community development initiatives.
Housing Equality Center of Pennsylvania	The Housing Equality Center offers a variety of programs and services to the general public to ensure that consumers have access to housing and understand their rights under fair housing laws.



Lehigh Career and Technical Institute	The Lehigh Career and Technical Institute is Pennsylvania's largest career and technical school, providing more than 45 skills-based programs of study.
Lehigh County Conference of Churches	The Lehigh County Conference of Churches assist those most in need in the community through programs directed to the homeless, the hungry, and to people with mental health concerns.
Lehigh Valley Center for Independent Living	The Lehigh Valley Center for Independent Living serves people with disabilities and their family members living in Lehigh and Northampton Counties.
Lehigh Valley Community Land Trust	The Lehigh Valley Community Land Trust is committed to strengthening communities by providing permanent, affordable housing in the Lehigh Valley. They create and preserve affordable homes for working families, the Trust either builds or renovates homes and sells these homes to income-qualified applicants in its program.
Lehigh Valley Partnership for a Disability Friendly Community	The Disability Friendly Community operates a variety of programs to make the Lehigh Valley more inclusive, accessible, and welcoming to people with disabilities, their caregivers, families, and advocates.
Neighborhood Housing Service of the Lehigh Valley	Neighborhood Housing Services of the Lehigh Valley's mission is to increase the financial stability of families and individuals by providing programs and services that create and preserve opportunities for homeownership and decent, safe, and affordable housing.
New Bethany Ministries	New Bethany Ministries provides comprehensive programming to help individuals and families work towards, achieve, and maintain self-sufficiency.
North Penn Legal Services	North Penn Legal Services provides free civil legal services to low-income families in northeast Pennsylvania.
The Salvation Army - Lehigh Valley	The Salvation Army - Lehigh Valley works to provide services to the homeless, train and mentor the disadvantaged, and provide character building programs for youths.
The Literacy Center	The Literacy Center is a leader in community-based adult literacy education built on innovative, cost-effective instructional services that ensure excellence in student outcomes.
Turning Point of Lehigh Valley	Turning Point of Lehigh Valley is a safe place where victims of abuse and their children can find refuge. Its mission is to eliminate domestic violence in the Lehigh Valley through empowerment, education, and engagement.



8. Planning, Zoning, and Building Codes

Unlike many states, Pennsylvania's legislature has retained very little authority over zoning and land use, having delegated it to the state's many units of local government. The Pennsylvania Municipalities Planning Code, Act 247 of 1968, delegates the responsibility for planning to each local municipality and county. Thus, while the Municipalities Planning Code governs the Lehigh Valley Planning Commission, counties, cities, townships, and boroughs often perceive zoning and land use powers as the primary means of shaping the appearance and character of their jurisdictions.

Lehigh County contains twenty-three (23) municipalities and 16 Census Designated Places (CDPs). According to the Executive Director of The Lehigh Valley Planning Commission (LVPC), each municipality has substantial control over their fair housing laws. This puts counties at a disadvantage to the municipalities within them. LVPC has written a municipal guide on Fair Housing. The LVPC released the guide in December of 2015 which explains Fair Housing through municipal zoning and code enforcement. Throughout this document, the LVPC has highlighted the responsibilities that fall on the region's communities to provide for inclusive residential opportunities.

As part of the work, LVPC has prepared a series of model municipal ordinances to address fair housing for the region's typical community and housing types. The region's development pattern ranges from urban, to suburban, to rural, necessitating a suite of model ordinances to address the region's fair housing needs. The package of model ordinances includes: mixed use development; conservation subdivision; cottage housing; traditional neighborhoods; street connectivity; density bonuses; and inclusionary zoning.

LVPC's Inclusionary Zoning Model Ordinance is meant to provide local municipalities a better understanding of inclusionary zoning, its components, and associated issues. Inclusionary zoning creates affordable housing, ideally by reducing public expenditure and in a way that avoids the creation of intense concentrations of low- or moderate-income households in a community. The Inclusionary Zoning Model Ordinance touches upon the incentives or enforcement of such zoning,



options for onsite/offsite affordable housing construction, targeting of income groups, and land use compatibility.

Additionally, Lehigh and Northampton Counties and the LVPC continue to partner with North Penn Legal Services to present educational events on Fair Housing implementation to the local municipal officials.

U.S. Department of Housing and Urban Development (HUD)

HUD encourages its grantees to incorporate "visitability" principles into their designs. Housing that is "visitable" has the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor. "Visitable" homes have at least one accessible means of egress/ingress for each unit, and all interior and bathroom doorways have 32-inch clear openings. At a minimum, HUD grantees are required to abide by all Federal laws governing accessibility for disabled persons.

Federal Requirements

Federal laws governing accessibility requirements include Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act.

Section 504 of the Rehabilitation Act (24 CFR Part 8), known as "*Section 504*" prohibits discrimination against persons with disabilities in any program receiving Federal funds. Specifically, Section 504 concerns the design and construction of housing to ensure that a portion of all housing developed with Federal funds is accessible to those with mobility, visual, and/or hearing impairments.

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. Specifically, ADA gives HUD jurisdiction over housing discrimination against persons with disabilities.

The Fair Housing Act was amended in 1988 to include persons with disabilities as a protected class, as well as to include design and construction requirements for housing developed with private or public



funds. Specifically, this law requires property owners to make reasonable accommodations to units and/or public areas in order to allow the disabled tenant to make full use of the unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant full use of the unit. As it relates 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.

9. Taxes

Real estate property taxes may also impact housing affordability. This may not be an impediment to fair housing choice, but it does impact the affordability of housing.

The following table shows the millage rates for the boroughs and townships in Lehigh County.

Table IV-20 - Lehigh County Property Taxes - 2018

	Borough	School	County	Total
Alburtis	0.00383000	0.01838080	0.00364000	0.02585080
Catasauqua	0.00610000	0.01896560	0.00364000	0.02870560
Coopersburg	0.00540000	0.01582000	0.00364000	0.02486000
Coplay	0.00489000	0.01721080	0.00364000	0.02574080
Emmaus	0.00597150	0.01838080	0.00364000	0.02799230
Fountain Hill	0.00811000	0.01837000	0.00364000	0.03012000
Macungie	0.00400000	0.01838080	0.00364000	0.02602080
Slatington	0.00530000	0.02196120	0.00364000	0.03090120
Taxes	Township	School	County	Total
Hanover	0.00007955	0.01896560	0.00364000	0.02268515
Heidelberg	0.00140000	0.01624030	0.00364000	0.02128030



Lower Macungie	0.00050000	0.01838080	0.00364000	0.02252080
Lower Milford**	0.00101634	0.01582000	0.00364000	0.02047634
Lowhill	0.00066425	0.01624030	0.00364000	0.02054455
Lynn	0.00020000	0.01624030	0.00364000	0.02008030
North Whitehall Township	0.00050000	0.01552000	0.00364000	0.01966000
Salisbury	0.00220000	0.01889550	0.00364000	0.02473550
South Whitehall Township	0.00296975	0.01552000	0.00364000	0.02212975
Upper Macungie	0.00064000	0.01552000	0.00364000	0.01980000
Upper Milford	0.00017100	0.01838080	0.00364000	0.02219180
Upper Saucon	0.00136910	0.01582000	0.00364000	0.02082910
Washington	0.00030000	0.02196120	0.00364000	0.02590120
Weisenberg	0.00056000	0.01624030	0.00364000	0.02044030
Whitehall Township	0.00280000	0.01721080	0.00364000	0.02365080

Source: Lehigh County Office of Assessment

**Lower Milford is not a member of the Consortium

There are several tax abatements and exemptions for taxpayers in Lehigh County:

Governor Rendell signed Special Session Act 1 of 2006, the Taxpayer Relief Act, on June 27, 2006. This law eases the financial burden of home ownership by providing school districts the means to lower property taxes to homeowners, especially senior citizens, via the funding provided by gaming revenue.

- **Act 1 (Property Tax Relief):** Property owners with primary residences in Lehigh County are eligible to have the property assessment value of their homes reduced for school tax purposes only. If they are already receiving the Act 50 Homestead Exclusion, property owners are automatically enrolled in the Act 1 program.
- **Act 50 (Homestead/Farmstead Exclusion):** County property owners with primary residences in the County can have their



assessed value of their homestead or farmstead reduced by the amount of the exclusion before the property tax is computed. Applications must be submitted to the Lehigh County Assessment Office.

- **American Heroes Grant:** Residents who are deployed by the military for a period of four (4) months or more may be eligible to receive a refund of County Taxes.

10. Comprehensive Plan – Lehigh Valley 2030

The Lehigh Valley Planning Commission (LVPC) completed a comprehensive plan for Lehigh and Northampton Counties in 2005 and updated it in 2010.

To develop the plan, LVPC used resident surveys to obtain as much information as possible. The Public Opinion Land Use Survey was mailed to 4,000 registered voters and 1,078 completed surveys were returned. The findings provided through the surveys were used in conjunction with the conclusions reached in four (4) workshops on the plan. Based on the public opinion surveys, workshops, and information provided to the LVPC at the public meetings, the major planning issues in the Lehigh Valley were determined to be:

- Preservation of farmland;
- Preservation and protection of natural features;
- Redevelopment of old industrial sites including brownfields;
- Renewal and revitalization of the cities;
- Development of more parks and recreational facilities;
- Upgrade roads and intersections.

The comprehensive plan thus advocated for measures to achieve these goals, as well as other conservation, development, and redevelopment priorities over the next 25 years. The key development concepts advocated in the plan include:

- Conservation of important natural areas and conservation of farmland;
- New growth contiguous with major existing urban areas;
- New growth in designated urban areas where community utilities already exist or can be expanded;



- Increased residential densities in designated urban areas;
- No urban growth in areas designated for natural resources or farmland;
- Better use of tools already authorized in the Pennsylvania Municipalities Planning Code;
- Extensive infill, redevelopment, and reuse of properties in cities, townships, and boroughs;
- Combined economic and community development efforts to provide well-paying jobs and improve the tax base of municipalities in distress;
- Continued development of transportation facilities, community utilities, and public parks to meet the needs of the region as it grows in the future.

The key regional smart growth measures identified in the plan include:

- Implementation of regional growth boundaries or regional urban service areas
- Increased urban densities and urban infill
- Workable agricultural and natural resource protection measures in the rural areas
- No public sewer, water, or major roadways in agricultural areas;
- Brownfield redevelopment
- Multi-municipal planning
- Improved levels of transit service in urban areas
- Enhanced cultural and environmental amenities in urban areas

11. One Lehigh Valley Sustainability Plan

The Lehigh Valley Sustainability Consortium was formed in 2010 as a collaboration of organizations to advance the Comprehensive Plan (The Lehigh Valley...2030). Consortium partners each agreed upon the need for a coordinated, multi-jurisdictional planning effort to integrate housing, land use, economic and workforce development, transportation, and infrastructure investments.



In 2011, the Consortium received a \$3.4 million grant from the U.S. Department of Housing and Urban Development (HUD) to pursue these interests through HUD's Sustainable Communities Regional



Planning Grant Program. Lehigh Valley Economic Development Corporation (LVEDC) served as the administrator of the grant. The Consortium members included:

- Lehigh Valley Economic Development Corporation (LVEDC)
- Lehigh Valley Planning Commission (LVPC)
- Community Action Committee of the Lehigh Valley (CACLV)
- Lehigh And Northampton Transportation Authority (LANta)
- Renew Lehigh Valley (RenewLV)
- Lehigh County Department of Community and Economic Development (LCDCED)
- Northampton County Department of Community and Economic Development (NCDCED)
- Wildlands Conservancy (WC)
- City of Allentown
- City of Bethlehem
- City of Easton
- The Nurture Nature Center
- Lehigh Valley Research Consortium (LVRC)
- Lehigh Valley Association of Independent Colleges (LVAIC)

These efforts resulted in the “One Lehigh Valley Sustainability Plan,” which explores a variety of topics including: housing, transit supportive land use, economic development, food access, parks and recreation, climate and energy, and catalytic projects in Lehigh, Northampton, and Carbon Counties.

Furthermore, the Lehigh Valley Planning Commission, a member of the Sustainability Consortium, developed a series of 31 goals intended to serve as an update to the Regional Comprehensive Plan (The Lehigh Valley... 2030).

12. FutureLV Regional Comprehensive Plan

The Lehigh Valley Planning Commission (LVPC) is the official planning agency of Lehigh and Northampton Counties and is in the process of creating the fifth Comprehensive Plan for the region. The current plan was created in 2005, with substantial updates in 2010. However, the economy, population, land use and even consumer preferences have changed since the current plan was first written, leading to the LVPC's desire to completely and strategically develop a new set of goals,



policies and implementation strategies. This effort began in December 2016 and will continue through 2019. The FutureLV will cover both Lehigh and Northampton Counties.

The FutureLV Plan was launched at the end of December, 2016. Research and data collection were completed in 2017, followed by community surveys and data analysis. Goals and policy development have taken place throughout the Winter of 2018 and a draft plan will be developed in early- to mid-2019. The Lehigh Valley Planning Commission is expecting completion of the plan by October of 2019.

13. Regional Housing Plan

The Lehigh Valley Planning Commission authorized a Regional Housing Plan in 2014 as an updated analysis of the Lehigh Valley housing market in light of the changed economy since the start of the Great Recession in 2008. LVPC and its consultant attempted to understand the jobs-housing balance along LANta routes, based off the growing understanding that links housing and transportation costs with cost burdens for individuals. The study focused on understanding the potential to connect housing policy to local workers, their jobs, and their ability to pay for housing. More efficiently connecting workers with their jobs not only reduces congestion and commuting times, but increases quality of life and reduces travel costs for Lehigh County residents.

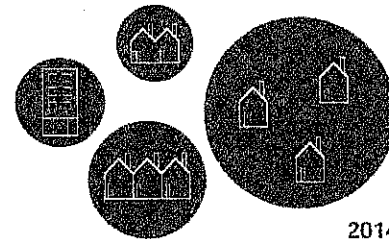
As the Lehigh Valley is one of the most rapidly growing regions of the Commonwealth of Pennsylvania, these population increases have created stark divides between the Cities of the Lehigh Valley and the Boroughs and Townships that surround them. These divides are based on income, homeownership, and categories of race/ethnicity, especially since the Lehigh Valley has experienced a noticeable increase in its Hispanic population. Much of the new housing development in the region has taken place in the Boroughs and Townships. As a result, the Lehigh Valley Planning Commission identified the following needs in the Regional Housing Plan:



- **Affordability** - The Lehigh Valley market is undersupplied in housing for the households earning less than \$29,350 per year. Many households at the highest end of incomes (above \$70,440 per year) use less than 30% of their gross income on housing to “buy down” from their ability to pay.

LVPC

Regional Housing Plan



2014

- **Variety** - The current market offers few, larger (2 and 3+ bedroom) rental units for lower income households. For higher income households, ownership opportunities are almost exclusively single family detached housing, and rental opportunities are only 3+ bedroom apartments.
- **Distribution** - The concentration of certain housing types with low demand can result in inadvertent concentration of lower priced housing or low income households in few select places, particularly the cities and boroughs with older housing stock. The disproportionate growth of low-density housing in the distant suburban townships—along with jobs in those areas—results in a persistent imbalance of jobs and housing across much of the Valley.
- **Condition** - Housing rehabilitation is as great a need as housing development. Those households earning less than \$29,350 per year are the most susceptible to cost overburdening and are also the most susceptible to substandard housing conditions.

Proposed Solutions:

The Lehigh Valley Planning Commission intends to unite the various existing stakeholders including public, private, and nonprofit housing entities in the Lehigh Valley to coordinate strategies, pool resources, and advocate for a comprehensive vision to ensure housing in the area meets the needs of all residents. Proposed solutions include:

- Supporting the region’s Neighborhood Partnership, Main Street, borough, city and suburban revitalization initiatives and programs to stabilize, clean-up, reuse and rehabilitate vacant and underutilized buildings and lands for housing (and other uses).



- Publishing the Annual Development and Building Activity Report and augment the document with annual housing sales data.
- Supporting the creation of an affordable housing loan consortium for developing housing for households at or below 50% of the Area Median Income.
- Engaging the region in the housing market in the developing and redeveloping. The LVPC will continue to provide tailored professional zoning and development guidance on housing needs and issues.
- Developing a model housing rehabilitation program translatable to urban, suburban, and rural municipalities. The program should include a property maintenance toolbox and provide specific recommendations on aging in-place, neighborhood stabilization and revitalization, façade improvements, and housing stock preservation.
- Coordinating with high-growth municipalities to refine or rework comprehensive plans, official maps, subdivision and land development ordinances, impact fees and other regulatory mechanisms to encourage housing development at densities appropriate to growth experienced or anticipated.
- Continuing to develop model ordinances relating to the region's housing with a focus on design and density appropriate for new and existing development. Commercial corridors and districts, transit and community services access, multi-generational communities, mixed-use and multifamily housing will be primary focuses of the LVPC's municipal assistance program.
- Establishing a consortium to address the region's jobs-housing imbalances, housing affordability, availability, condition and market, and relate these issues to the Comprehensive Regional Plan.

The Regional Housing Plan found that in the Lehigh Valley, the *"housing affordability analysis and the jobs-housing balance analysis indicate that housing values in the Valley do not reflect local households' ability to pay. The Lehigh Valley market is undersupplied in housing for the households earning less than 50% of AMI (\$29,350), based on the housing affordability analysis, and even up to 80% of AMI (\$46,960) from the more income conservative jobs-housing balance analysis. The total number of owner and rental cost burdened households under 50% of AMI is 40,750. The most vulnerable Lehigh Valley households are the least served, with large housing shortages*



below 30% of AMI (\$17,610). This translates into many households at the lowest incomes being forced to pay above 30% of their gross income for housing, exceeding the threshold and becoming cost burdened. The alternative is to seek housing outside the Valley.” (LVPC – Regional Housing Plan, page 238: http://www.lvpc.org/pdf/2014/Housing%20Plan/LVPC_Regional_Housing_Plan.pdf#page=256). LVPC suggests inclusionary zoning as a way to target a variety of income groups. While this analysis pertains to the entire Lehigh Valley and includes the Cities of Allentown, Bethlehem, and Easton it provides a greater understanding of the regional housing market.

14. Transportation

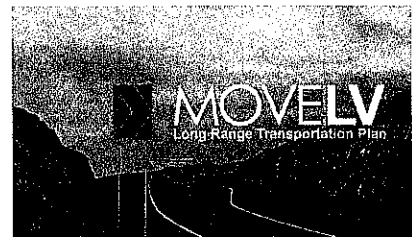
Transportation plays an important aspect in determining where residents choose to live. Some families choose to live in an area that is more private than physically connected, while others place more emphasis on proximity to main arteries and highways for commuting to work.

LVPC’s Lehigh Valley Transportation Study (LVTS)

The Lehigh Valley Planning Commission’s Lehigh Valley Transportation Study (LVTS) recently created the region’s first Multimodal Transportation Working Group in October, 2017. The group is serving as an advisory board of the LVTS and will provide people a greater voice in future transportation planning and aid the LVPC in collecting information for the region’s first master plan for pedestrian, biking, and all modes of transportation.

LVPC’s MoveLV Long-Term Transportation Plan

The Lehigh Valley Planning Commission’s MoveLV Long-term Transportation Plan emphasized public involvement as a vital component of the transportation planning process. Not only is public participation in the transportation field mandated by Federal Transportation Legislation,





the Civil Rights Act, the Americans with Disabilities Act, and Environmental Justice considerations, LVPC considers it a vital component of the process. LVPC conducted extensive public participation as part of the MoveLV, which included sending public meeting notices on the draft MoveLV Plan to social service organizations that focus on disabilities, including visual impairment and blindness services, Lehigh County Area Aging and Adult Services, Lehigh Valley Center for Independent Living, ARC of Lehigh and Northampton Counties, and Accessible Transportation for the Disabled, Inc.

The MoveLV Plan notes that the problems encountered by the most vulnerable populations often arise from different circumstances and require a different type of community response. Low-income residents, older adults, and disabled residents are often not able to drive themselves and thus have limited options for transportation. Efficient and adequate access to public transportation is critical to the independence of people with disabilities. All new LANta vehicles used in public transit are accessible and paratransit services are consistently reevaluated to assure optimal service.

Lehigh and Northampton County Transit Authority (LANta)

The Lehigh and Northampton County Transit Authority (LANta) operates the LANtaBus System, a network of 23 fixed bus routes and 10 special routes throughout the Lehigh Valley providing daily, evening, Saturday,



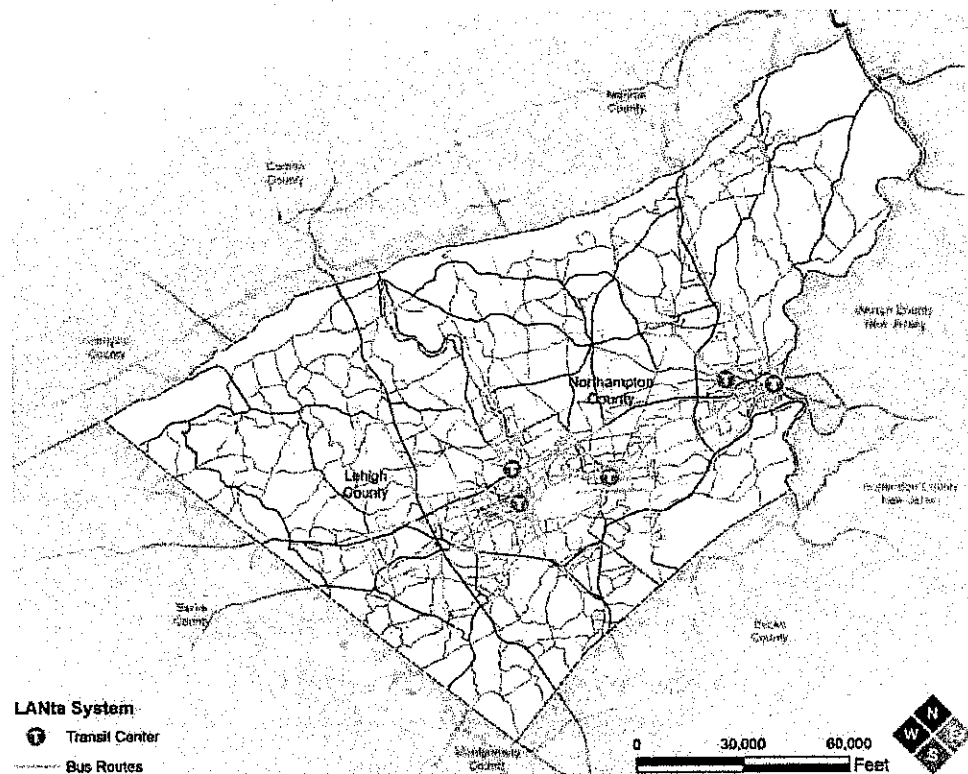
and Sunday services. LANta meets the transportation needs of persons with disabilities and the elderly through LANtaVan, a door-to-door shared ride paratransit service available to riders in Lehigh and Northampton Counties who are registered and certified as eligible for sponsorship under various transportation funding programs. LANtaVan provides transportation for:

- People who are eligible if there is no LANtaBus fixed-route service nearby or if they have a physical disability. Though open to people of any age for 'full' fare, those 65+ can ride for 15% of the actual fare (the remaining 85% is paid by the Pennsylvania Lottery funds).



- People with a valid Medical Assistance (M.A.) ACCESS Card are eligible to use LANta Van service to go to M.A. reimbursable appointments (doctors, medical tests and treatment, dialysis, etc.) if they meet the PA Department of Welfare's program requirements.
- Physically disabled persons who are eligible under the Americans with Disabilities Act (ADA).
- Clients of the Lehigh and Northampton County Area Agencies on Aging.

LANta continually updates its 83-bus fleet and provides more than 5.0 million rides annually. While the system is concentrated in the urbanized areas of the Cities of Allentown, Bethlehem, and Easton, there are routes that go through portions of the outlying areas of Lehigh County.



Lehigh Valley Planning Commission & LANta

LANta Bus rider surveys show that more than half of LANtaBus service riders use the service to travel to and from work. An additional 10-15



percent use the service to travel to and from school. The remaining 35-40 percent use LANta Bus for shopping, medical appointments, personal business, and other quality of life needs. While LANta operates the LANta Van to provide services for people with disabilities and the elderly, LANta Bus service does provide bus service to approximately 2,000 seniors daily, allowing elderly to maintain independence and age-in-place (MOVELV Long Range Plan).

Additionally, LANta provides the following transportation services to the residents of the Lehigh Valley:

- 34 core routes that serve the Cities of Allentown, Bethlehem, Easton, and surrounding suburban areas. These generally operate from 5:00 a.m. to 7:00 p.m.
- The 100 series LANta Bus routes provide evening service on weekdays and Saturdays to the more urban parts of the Lehigh Valley; these routes typically operate between 7:30 PM and midnight and are geared to residents going to third shift jobs and returning from second shift jobs at major employment and medical facilities.

In 2014, LANta commissioned the Lehigh Valley Enhanced Bus/BRT Study to prepare a conceptual enhanced bus/bus rapid transit service plan; this Plan identified regional goals and objectives for the service, analyzed the demand and potential benefits within each corridor, and developed a conceptual design plan for these corridors. The Plan involved a public involvement process, which included an Advisory Committee, Board workshops, public open houses, and stakeholder meetings. The LANta Board of Directors officially adopted the Lehigh Valley Enhanced Bus/Bus Rapid Transit Study in 2014 and has used all elements of the plan as resources became available.

Low Transportation Cost Index (HUD AFFH Tool)

The map on page 165 was provided through the HUD AFFH Tool to illustrate transportation costs overlaid with demographic data in Lehigh County. The Low Transportation Cost Index is based on estimates of transportation costs for a family that meets the following criteria: a 3-person single-parent family with a household income at 50% of the median income, who are renters, for the region. This Index measures transportation costs as a percent of income for renters, with the higher the index, the lower the cost of transportation in that neighborhood.



The data provided in Table IV-21 shows fairly equal Low Transportation Cost Indices for the different racial/ethnic cohorts. The Hispanic population has the greatest cost of transportation as a percent of income (60.20%), followed closely by the Black/African-American population (59.86%). However, the cost of transportation as a percent of income is lower in Lehigh County than in the Allentown-Bethlehem-Easton PA-NJ MSA. These differences could be a result of higher rents inside the Cities of Allentown and Bethlehem, or greater access to cheap transportation options in Lehigh County.

**Table IV-21 – Low Transportation Cost Index
– Lehigh County & Region**

Race	Lehigh County	Allentown-Bethlehem-Easton PA-NJ MSA
White	51.67	55.87
Black/African-American	59.86	71.18
Hispanic	60.20	75.40
Asian or Pacific Islander	53.59	60.30
Native American	54.90	63.06

Source: HUD AFFH Tool

Transit Trips Index (HUD AFFH Tool)

The Transit Trips Index is based on estimates of transit trips taken by a family that meets the following description: a 3-person, single-parent household with income at 50% or below of the median income. The higher the Transit Trips Index, the more likely residents utilize public transit. Per Table IV-22, the Black/African-American population is the most likely group (40.24th percentile) in the County to use public transportation, followed closely by Hispanics (39.93th percentile) and Asian or Pacific Islander (37.40th percentile). However, all scores are lower in Lehigh County than the region, most likely due to the urban centers of Allentown, Bethlehem, and Easton.



**Table IV-22 – Transit Trips Percentile Index
– Lehigh County & Region**

Race	Lehigh County	Allentown-Bethlehem- Easton PA-NJ MSA
White	34.66	35.51
Black/African-American	40.24	46.86
Hispanic	39.93	50.10
Asian or Pacific Islander	37.40	38.74
Native American	36.99	41.44

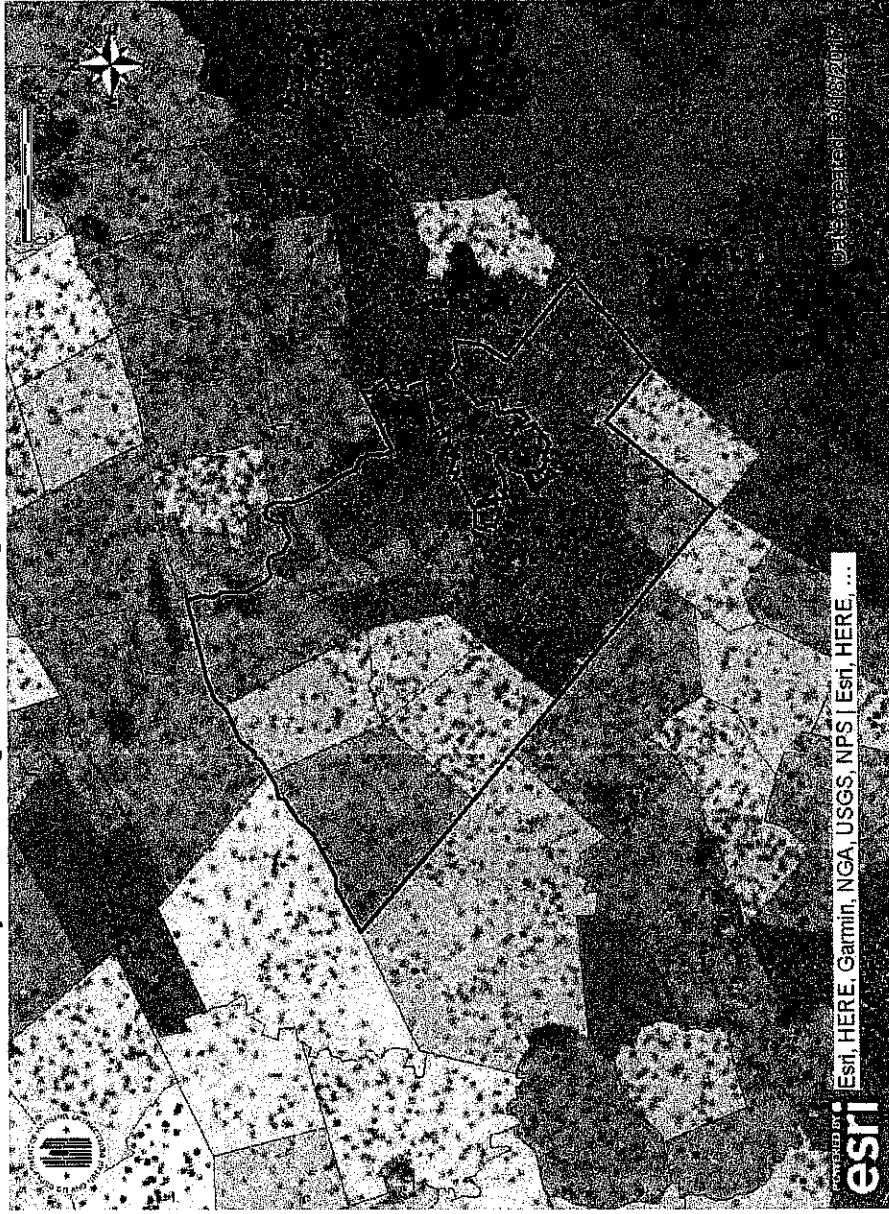
Source: AFFH Tool



2018 Analysis of Impediments to Fair Housing
Impediments to Fair Housing 2018



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Demographics 2010

1 Dot = 75 People

White, Non-Hispanic

Black, Non-Hispanic

Native American, Non-Hispanic

Hispanic

Asian/Pacific Islander, Non-Hispanic

Hispanic

Hispanic

Other, Non-Hispanic

Multi-racial, Non-Hispanic

R/ECAP

Low Transportation Cost Index

0 - 10

10.1 - 20

20.1 - 30

30.1 - 40

40.1 - 50

50.1 - 60

60.1 - 70

70.1 - 80

80.1 - 90

90.1 - 100

Name: Map 11 - Demographics and Low Transportation Cost

Description: Low Transportation Cost Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Lehigh County (CDBG)

Region: Allentown-Bethlehem-Easton, PA-NJ



During the public participation phase of this Analysis of Impediments to Fair Housing Choice, local stakeholders stated that public transportation does not provide enough transit options, in particular, to centers of employment. As low-income individuals and families rely more heavily on public transportation, the routing decisions made by LANta have an impact on alleviating or worsening housing segregation and limiting housing choice.

15. Jobs and Workforce Development

The location and proximity of jobs is an important factor when deciding where to live. The HUD AFFH Tool provides a **Jobs Proximity Index**, which measures the physical distances between place of residence and jobs by race/ethnicity. Per Table IV-23, the range of job proximity scores is relatively small, meaning that no particular protected class has excessively better or worse access to good jobs. The Job Proximity Indices for Lehigh County are all higher than those for the region, but by a very small margin. While these indices stay somewhat constant when observing the population below the Federal poverty line, the Black/African-American population of Lehigh County has a much lower score, decreasing from the 42.40th percentile to the 36.05th percentile. Black/African-American residents that are below the Federal Poverty Line have less access to quality jobs in Lehigh County.

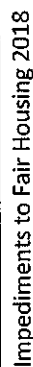
Table IV-23 – Jobs Proximity Percentile Index

Race	Lehigh County	Allentown-Bethlehem-Easton PA-NJ MSA
White	49.96	49.50
Black/African-American	52.40	48.00
Hispanic	50.92	45.49
Asian or Pacific Islander	55.91	55.32
Native American	50.92	48.41

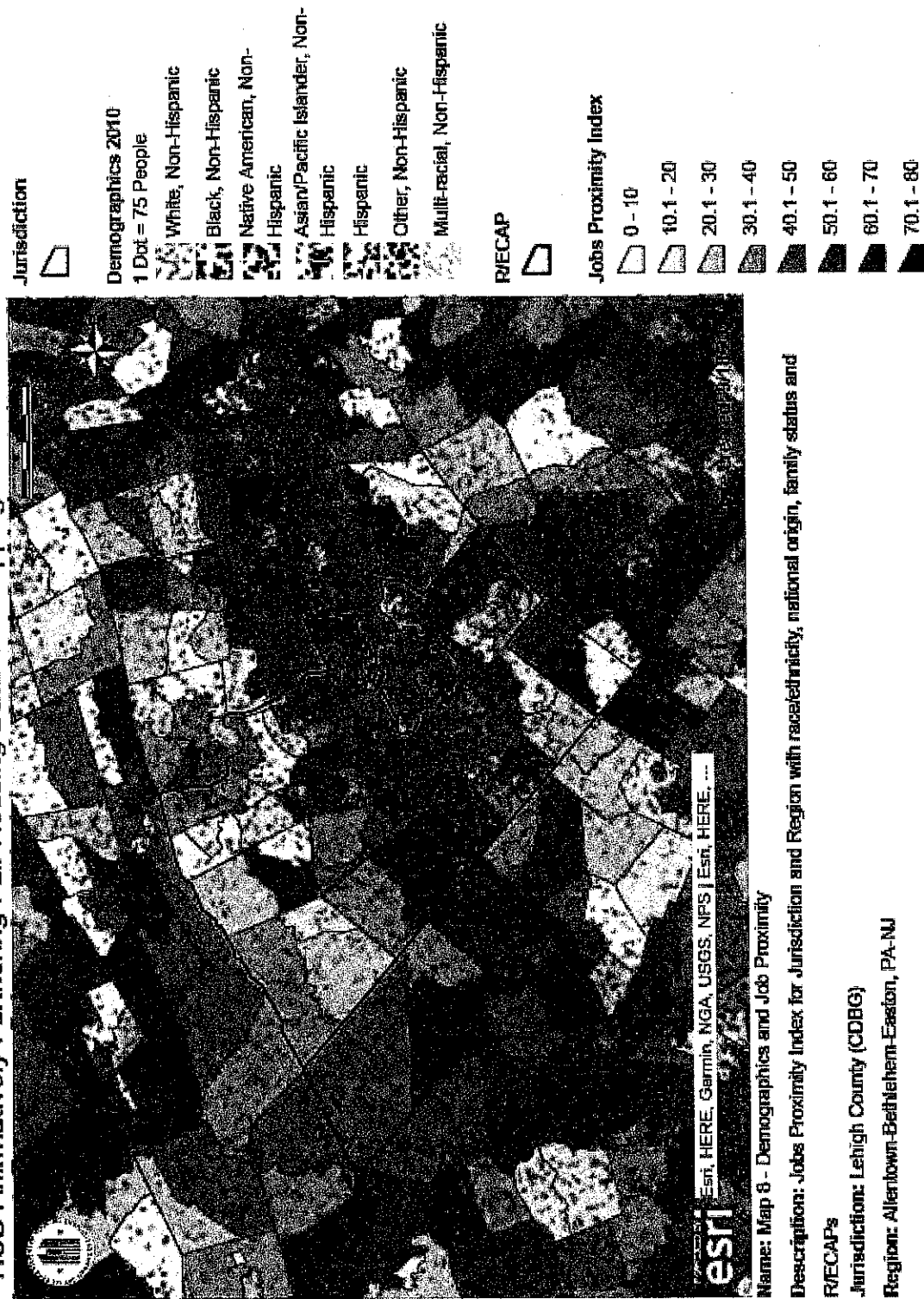
Source: AFFH Tool



The AFFH Tool provides the option to overlay the Jobs Proximity Index data with race/ethnicity, family origin, and familial status layers to determine if patterns exist. AFFH Tool Map 8 (shown below) shows high job proximity scores in areas surrounding the City of Allentown, as well as along the I-78 corridor west of the city. These areas with higher index scores are also somewhat comparable to the Census Tracts with higher concentrations of minorities.



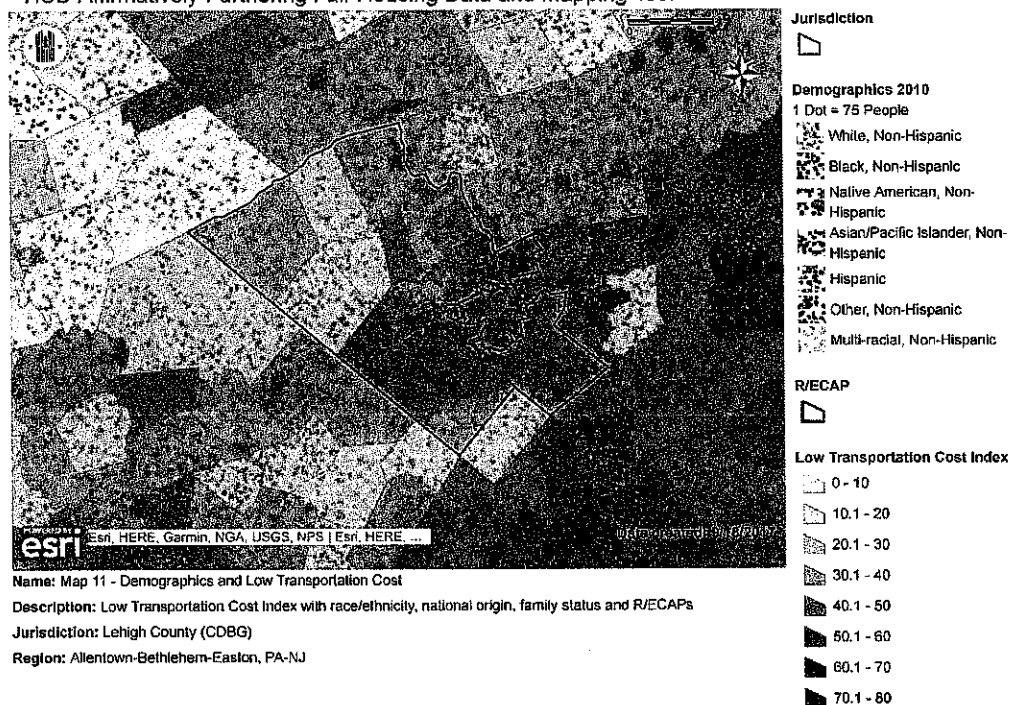
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool





Additionally, Lehigh County and the Lehigh County Housing Authority used the AFFH Tool's Map 11 (below) to determine that the Census Tracts immediately north and west of the City of Allentown have the highest Low Transportation Cost Indices, which could again indicate higher rents in the urban areas of the County and region. Note that there are no R/ECAPs within Lehigh County's jurisdiction outside the City of Allentown. Map 11 shows racial/ethnicity, national origin, and familial status overlaid on the Transit Trips Index and reaffirms the data that showed Lehigh County residents were less likely to use public transportation compared to the region. The urban areas of Allentown, Bethlehem, and Easton and their residents are typically more reliant on public transportation.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Per Table IV-24, there are fairly even levels of job proximity for all racial cohorts in Lehigh County. The Job Proximity Indices for Lehigh County are all higher than those for the region, but by a very small margin.



**Table IV-24 – Jobs Proximity Percentile Index for
Population Below Federal Poverty Line**

Race	Lehigh County	Allentown-Bethlehem- Easton PA-NJ MSA
White	48.60	50.06
Black/African- American	36.05	46.57
Hispanic	47.65	46.25
Asian or Pacific Islander	57.41	49.75
Native American	50.98	58.57

Source: AFFH Tool

The **Labor Market Index** provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. The index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree. The Labor Market Index is presented as a percentile ranked nationally and ranges from 0 to 100; the higher the Labor Market Index, the higher the labor force participation and human capital exist in a neighborhood.

Table IV-25 – Labor Market Percentile Index

Race	Lehigh County	Allentown-Bethlehem- Easton PA-NJ MSA
White	71.30	59.87
Black/African- American	68.92	41.54
Hispanic	66.86	33.58
Asian or Pacific Islander	76.14	64.60
Native American	65.98	46.63

Source: AFFH Tool

The Asian or Pacific Islander population has the highest Labor Market Index score (76.14th percentile) in the County, followed by White (71.30th percentile). All index scores are higher in Lehigh County in comparison to the region as a whole, which illustrates



ample employment access when compared to regional levels. In the Allentown-Bethlehem-Easton PA-NJ MSA, the Hispanic (33.58th percentile) and Black (41.54th percentile) populations have the lowest Labor Market Index Scores, meaning that less members of these groups are involved, or able to be involved, in the labor market.

**Table IV-26 – Labor Market Percentile Index for
Population Below Federal Poverty Line**

Race	Lehigh County	Allentown-Bethlehem- Easton PA-NJ MSA
White	65.86	44.92
Black/African- American	56.70	24.45
Hispanic	57.25	22.06
Asian or Pacific Islander	71.15	51.86
Native American	79.00	41.35

Source: AFFH Tool

While the Labor Market Index increased for the Native-American, Non-Hispanic population below the Federal Poverty Line in Lehigh County, all other indices were lower when just looking at the population below the Federal Poverty Line. The increase of the index score for the Native American population may have been due to sample size; the Native-American, Non-Hispanic population makes up just 0.10% of the County's population.

When considering those under the Federal Poverty Line in the Allentown-Bethlehem-Easton PA-NJ MSA, all LMI scores are lower, with the Hispanic (22.06) and Black (24.45) populations still having the lowest LMI scores.

The AFFH Tool's Map 9 (shown below) overlays race/ethnicity, family origin, and familial status data over the Labor Market Index. As stated above, Lehigh County has much higher Labor Market Index scores compared to the City of Allentown as well as the neighboring Carbon County. The Census tracts with the highest Labor Market Index scores coincide with those with higher Job Proximity Indices.



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Jurisdiction



Demographics 2010

1 Dot = 75 People

- White, Non-Hispanic
- Black, Non-Hispanic
- Native American, Non-Hispanic
- Hispanic
- Asian/Pacific Islander, Non-Hispanic
- Hispanic
- Hispanic
- Other, Non-Hispanic
- Multiracial, Non-Hispanic

R/ECAP



Labor Market Index

- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80

Name: Map 9 - Demographics and Labor Market

Description: Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Lehigh County (CDBG)

Region: Allentown-Bethlehem-Easton, PA-NJ



Through public comments, it was determined that there are areas of economic opportunity in northern portion of South Whitehall Township, Fogesville, and Trexlertown. Additionally, the areas of Upper Saucon Township, Lower Macungie Township, and Macungie Borough were identified as areas of opportunity for new economic growth in the County. These areas are all located adjacent to, or near, the City of Allentown and in close proximity to the I-476 and I-78 corridors.

Workforce Development:

Organizations and programs that are in place to develop the County's workforce include:

- The Lehigh Valley Workforce Development Board (LVWDB) uses Youth Contractors to develop the region's youth workforce. The LVWDB's youth workforce activities, include activities for youth with disabilities, and are branded as Youth CareerFORCE. Under the direction of the LVWDB and its Youth CareerFORCE Committee, youth workforce activities focus on at-risk populations with barriers to employment through outreach, recruitment and re-engaging youth into the workforce. Programs are designed to overcome barriers to employment with a goal of economic self-sufficiency. Lehigh Valley's five Youth CareerFORCE contractors include: Eckerd Kids, Inc.; Educational Data Systems, Inc.; The Children's Home of Easton; The Pennsylvania State University; and St. Luke's University Health Network. These are described in detail in Section 4.4 of the Lehigh County Workforce Development Board's Workforce Innovation and Opportunity Act Multi-Year Regional/Local Plan. It is the intention of the LVWDB to issue an out-of-school youth Request for Proposal in order to move its system to the expenditure levels required for out-of-school youth.
- The Lehigh Valley Workforce Development Board partners with the Office of Vocational Rehabilitation (OVR) through PA CareerLink®. Lehigh Valley's "The Office Quarters" provides technical assistance on disability issues to employers and PA CareerLink Lehigh Valley staff, and services are provided on an individualized basis. The OVR counselor, during face-to-face interviews, assists customers in selecting their choice of



vocational goals, services and service providers. An Individualized Plan for Employment (IPE) is developed, outlining a vocational objective, services, providers and responsibilities. Certain services are subject to a Financial Needs Test (FNT) and may require financial participation by the customer. Counseling and guidance, diagnostic services, assessments, information and referral, job development and placement, and personal services such as readers or sign language interpreters are provided at no cost to the individual.

- The Lehigh County Workforce Investment Board has also created a Diversified Manufacturing Industry Partnership, which led to the development of a Rotational Internship for technical students during the school year. Companies that manufacture products in seven high-priority manufacturing-related occupations have worked with students from all three (3) area technical schools.
- Lehigh County previously funded the Lehigh Valley Workforce Development Board, which allows local students to complete the week-long Career Linking Academy during the morning and obtain paid work experiences in the afternoon.
- A variety of core services are available to all dislocated workers through PA CareerLink Lehigh Valley. These services include:
 - Introductions to services in English and Spanish
 - Initial assessments of skill levels, aptitudes, abilities, supportive service needs, and eligibility prescreening for more in-depth programs
 - Job searches and placement assistance (job finding clubs, career exploration workshops, self-directed career resource center, and job fairs)
 - Performance and tuition cost information for "demand occupational training" from providers
 - Information regarding filing claims for Unemployment Compensation
 - Financial aid assistance for training and education programs
 - Assistance in determining eligibility for vocational rehabilitation services
 - Free workshops on resume preparation and career exploration
 - Access and exposure to the Lehigh Valley Professionals networking group, Veterans' Employment Service, Profile



Re-employment Program, Trade Adjustment Assistance, Rehabilitation Programs, Welfare-to-Work Program, Dislocated Worker Programs, Seniors Programs, and Youth Programs

- PA CareerLink Lehigh Valley offers an Employment Advancement and Retention Network (EARN) program designed to encourage participants to maintain employment. This leads to an increased likelihood of self-sufficiency through opportunities for career advancement, increased wages, and employer provided medical benefits. The Lehigh Valley EARN Program partners with the Northampton County and Lehigh Carbon Community Colleges in offering innovative vocational educational skills training, job readiness curriculum, and directed job search/placement.
- PA CareerLink Lehigh Valley also provides intensive services to qualified dislocated workers which may include: case management, career workshops, resume workshops, and one-on-one job counseling
- The Literacy Center of Lehigh Valley provides educational programs for residents of Lehigh Valley. They offer courses in ESL, GED preparation and family literacy, as well as a variety of workshops including computer literacy, financial literacy, health and nutritional literacy, resume writing, and interview training.
- Communities in Schools Career Supports at LCTI targets at-risk students with truancy supports and case management to overcome challenges and complete the LCTI career program. In addition to case management, CIS provides support groups for career awareness and increase resilience and confidence for achievement.

16. Education

Education is often an important factor influencing the opportunities for where people choose to live. Excluding Allentown and Bethlehem, there are eight (8) public school districts serving





Lehigh County. Additionally, there are three (3) public charter schools (Lincoln Leadership Academy, Roberto Clemente Charter School, and Seven Generations Charter School) and four (4) private high schools (Allentown Central Catholic, Lehigh Career and Technical Institute, Lehigh Valley Christian, and Salem Christian).

To ensure Pennsylvania schools are performing, the State uses the Pennsylvania School Performance Profile (SPP), which is an online platform released annually in the fall that provides a building level academic score to all schools. Additionally, the SPP informs the public of the academic performance measures of each school and provides local teachers, administrators, and parents an opportunity to compare the performance of local schools.

The following data in Table IV-27 is provided through the Pennsylvania School Performance Profile and provides the enrollment numbers and racial makeup of all school districts in the County. Additionally, the Building Level Academic Scores for all of the County's high schools are provided.

Lehigh County's public schools have been designated medium performing by the Pennsylvania Department of Education. According to the Pennsylvania Department of Education, Lehigh County's high schools had an average score of 76.9 for the 2016-2017 school year. There are eight (8) school districts in Lehigh County outside of the larger, more urban districts of Allentown and Bethlehem. These include: Northwestern Lehigh; Northern Lehigh; Whitehall Township-Coplay; Parkland; Catasauqua; East Penn; Salisbury Township; and Southern Lehigh. Of these, Catasauqua and Northern Lehigh each have a single school in the red triangle (lowest ranking) category, and all schools in Catasauqua School District are below the County average.



★ > 100	▲ 90-100	● 80-89.9	■ 70-79.9	60-69.9	▼ < 60
■ Not Applicable (NA)			■ Insufficient Sample (IS)		

**Table IV-27 – School Performance
Lehigh County, PA**

Race	Building Level Academic Score	State Rankings
Catasauqua High School	63.7	
Emmaus High School	83.3	▲
Northern Lehigh High School	79.2	■
Northwestern Lehigh High School	95.0	▲
Parkland High School	85.3	▲
Salisbury High School	76.3	■
Southern Lehigh High School	88.8	▲
Whitehall Township High School	81.0	▲

Source: Pennsylvania Department of Education

Catasauqua Area School District

- 1,525 enrollment
- 58.9% White, 27.1% Hispanic, 6.8% Black
- Catasauqua Senior High School – 63.7

East Penn School District

- 8,077 enrollment
- 76.2% White, 11.1% Hispanic, 4.2% Black, 5.0% Asian
- Emmaus High School – 83.3

Northern Lehigh School District

- 1,572 enrollment
- 84.1% White, 11.1% Hispanic, 1.5% Black
- Northern Lehigh Senior High School – 79.2



Northwestern Lehigh School District

- 2,144 enrollment
- 91.5% White, 4.5% Hispanic, 1.1% Black, 1.4% Asian
- Northwestern Lehigh High School – 95.0

Parkland School District

- 9,301 enrollment
- 67.4% White, 13.3% Hispanic, 4.2% Black, 11.6 Asian
- Parkland High School – 85.3

Salisbury Township School District

- 1,595 enrollment
- 70.6% White, 14.2% Hispanic, 3.8% Black, 2.6% Asian
- Salisbury Senior High School – 76.3

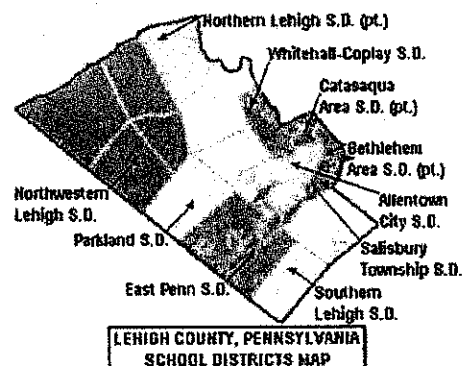
Southern Lehigh School District

- 3,150 enrollment
- 86.3% White, 4.9% Hispanic, 2.0% Black, 5.5% Asian
- Southern Lehigh Senior High School – 88.8

Whitehall Township-Coplay School District

- 4,294 enrollment
- 55.1% White, 26.6% Hispanic, 9.3% Black, 4.7% Asian
- Whitehall Township High School – 81.0

All school districts in the County (excluding Allentown) are more than 50% White, ranging from 55.1% (Whitehall Township-Coplay) to 91.5% (Northern Lehigh) of all students. Building Level Academic Scores ranged between 63.7 (Catasauqua Area) to 95.0 (Northwestern Lehigh).



Additional data on education is provided through the HUD AFFH Tool, which uses a **School Proficiency Index**; this index measures



which neighborhoods have high-performing elementary schools nearby and which have lower performing elementary schools. The values for the School Proficiency Index are determined by the performance of 4th grade students on state exams. The Index uses data for elementary schools because they are much more likely to have neighborhood-based enrollment policies.

The HUD AFFH Tool uses 2011-2015 American Community Survey data and provides a comparison between the Lehigh County jurisdiction and the Allentown-Bethlehem-Easton PA-NJ MSA.

Table IV-28 (below) shows that Lehigh County schools outperform those in the Allentown-Bethlehem-Easton PA-NJ MSA, often by wide margins. Additionally, per the 2011-2015 American Community Survey, 87.3% of Lehigh County residents above the age of 18 have a high school diploma or equivalent, compared to 81.3% of the residents of the City of Allentown and 88.6% of the residents of the region. The School Proficiency Index, found below, shows that the Asian or Pacific Islander population has the greatest access to quality schools in their neighborhood in Lehigh County. The White population has the next-highest school system quality within its school district (67.41), followed by Native American (66.31), Black (65.91), and Hispanic (61.21). While the Hispanic population has the lowest School Proficiency Index in Lehigh County, this racial cohort has considerably greater access to quality school systems than compared to the Allentown-Bethlehem-Easton PA-NJ MSA.

Table IV-28 – School Proficiency Index

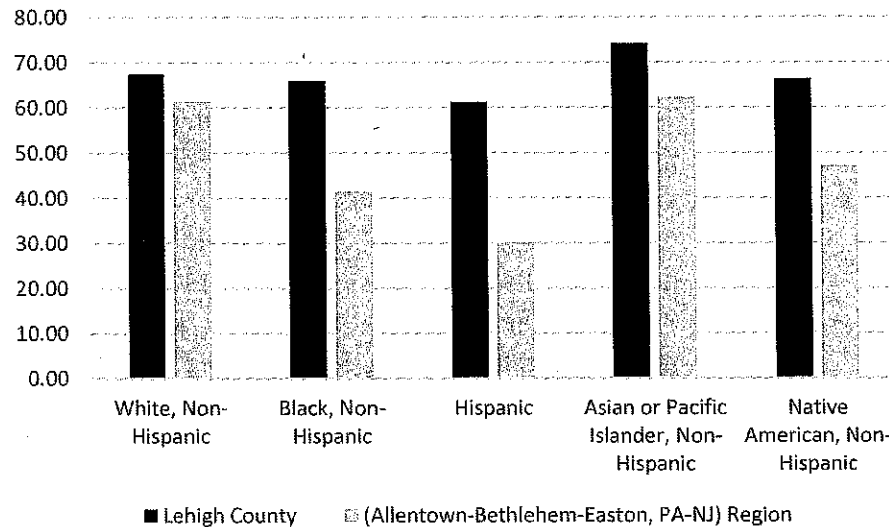
Race	Lehigh County	Allentown-Bethlehem-Easton PA-NJ MSA
White	67.41	61.34
Black/African-American	65.91	41.45
Hispanic	61.21	30.10
Asian or Pacific Islander	74.13	62.17
Native American	66.31	47.02



Source: AFFH Tool

The following chart illustrates the higher rates of school proficiency among all racial groups in Lehigh County compared to those of the Allentown-Bethlehem-Easton PA-NJ MSA.

**Chart IV-2 – School Proficiency Index by Race
(Lehigh County vs. Region)**



Source: AFFH Tool

The following Table IV-29 looks at the School Proficiency Index for the population below the Federal Poverty Line. Lehigh County schools again outperform the collective average of the region. When taking into account income, the Native American population has the highest School Proficiency Index in Lehigh County (79.01), followed by the Asian or Pacific Islander population (71.64). While the Hispanic population (57.89) again has a lower Index compared to other racial cohorts in the County, the Black population (46.78) has the least access to quality schools in their neighborhood. The Hispanic (21.98) and the Black (27.54) racial cohorts under the Federal Poverty Line have very little access to quality schools within the Allentown-Bethlehem-Easton PA-NJ MSA.



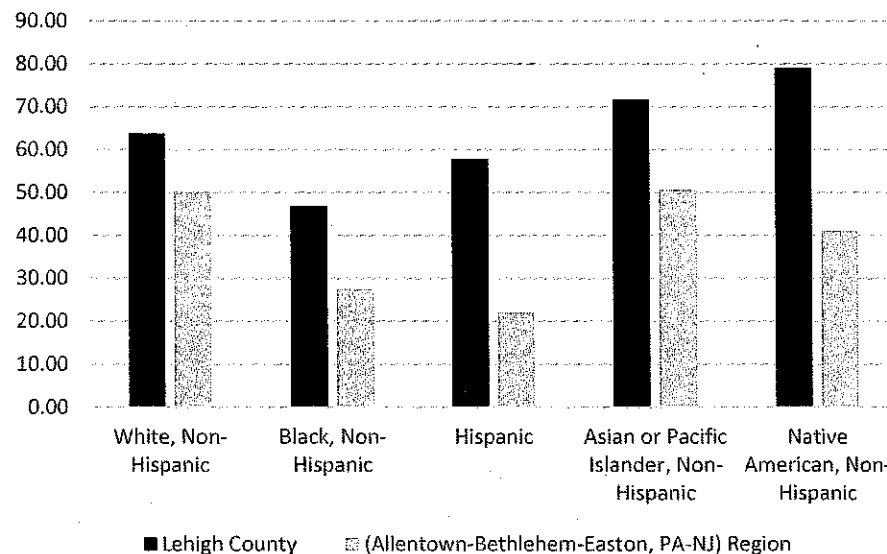
**Table IV-29 – School Proficiency Index for
Population Below Federal Poverty Line**

Race	Lehigh County	Allentown- Bethlehem-Easton PA-NJ MSA
White	63.71	50.05
Black/African- American	46.78	27.54
Hispanic	57.89	21.98
Asian or Pacific Islander	71.64	50.57
Native American	79.01	41.01

Source: AFFH Tool

The differences between the scores of Lehigh County and the region as a whole, are more exaggerated when looking at the population under the Federal Poverty Line.

**Chart IV-3 – School Proficiency Index for Population
Below Poverty Line (Lehigh County vs. Region)**



Source: AFFH Tool

Chart IV-4 provides an illustrative way of identifying correlations of school proficiency and race/ethnicity, national origin, and familial



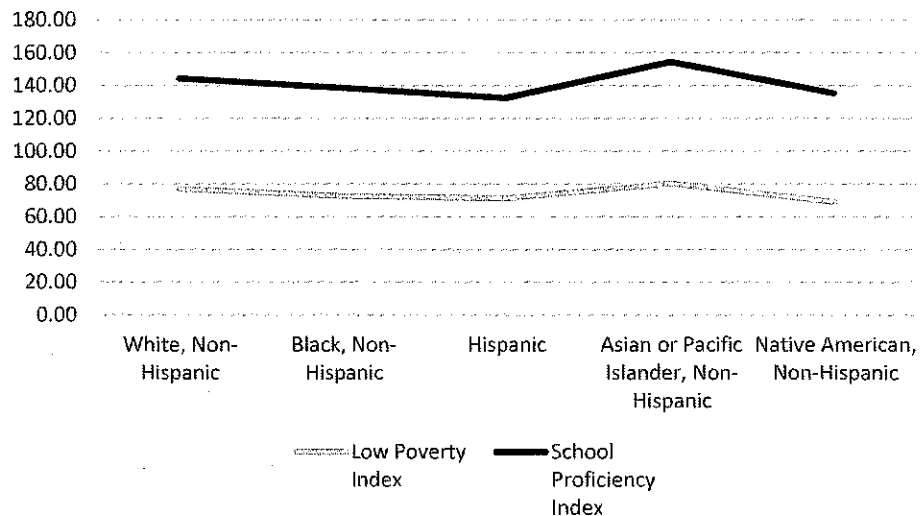
status. School proficiency is determined by the performance of 4th grade students on state exams, as elementary schools are much more likely to reflect the neighborhoods they represent than charter, private, and regional high schools.

The data supports the information provided in Table IV-29, which shows the fairly even school proficiency among the different race/ethnicities in Lehigh County; the School Proficiency Index for the different racial cohorts in Lehigh County all range between 61 and 74. However, when observing the school proficiency of those below the Federal Poverty Line, all racial cohorts perform similarly, except for the Black/African-American population, whose school proficiency scores fell from 65.91 to 46.78, indicating that lower-income Black residents have slightly less access to quality schools in their neighborhoods.

The Black/African-American population is slightly concentrated in certain areas of the County, most notably Macungie Borough, Alburtis Borough, Lower Macungie Township (Ancient Oaks CDP), Emmaus Borough, Fountain Hill Borough, Whitehall Township (Fullerton CDP), and Slatington Borough. In Pennsylvania, school districts are tied to municipal residency requirements and the designated boundaries within the respective districts. Students cannot attend schools outside the areas of their residence. Educational funding comes from state and local sources, with local funding helping balance any shortfalls from the state. This problem disproportionately affects districts with higher poverty rates, which also tend to have a lower tax base from which to generate revenue. The School Funding Disparity Study published by the U.S. Department of Education showed that in 2011-2012 (the U.S. Department of Education compiled this information over fifteen years, thus this is the most recent year the U.S. Department of Education has conducted this study), Pennsylvania had the largest disparity in expenditures per student between low poverty (\$12,529) and high poverty (\$9,387) school districts. This 33.5% difference was the largest expenditure gap in the United States.



Chart IV-4 – School Proficiency Index vs. Low Poverty Index



The previous chart illustrates the correlation between poverty and school performance by race in Lehigh County. While the values may differ, it appears a correlation exists among all racial groups.

17. Poverty and Access to Opportunity

Poverty

In addition to the U.S. Census and American Community Survey data, Lehigh County and the Lehigh County Housing Authority have used the AFFH Tool to provide further insight into poverty levels throughout the County. The **Low Poverty Index** found in HUD AFFH Map 12 (Page 185) captures poverty in a neighborhood. The values, based primarily off the poverty rate, are inverted, where the higher the score, the less exposure to poverty in a neighborhood.

**Table IV-29 – Low Poverty Percentile Index**

Race	Lehigh County	Allentown-Bethlehem-Easton PA-NJ MSA
White	76.87	69.03
Black/African-American	72.59	45.65
Hispanic	71.18	34.79
Asian or Pacific Islander	80.28	69.27
Native American	69.02	53.58

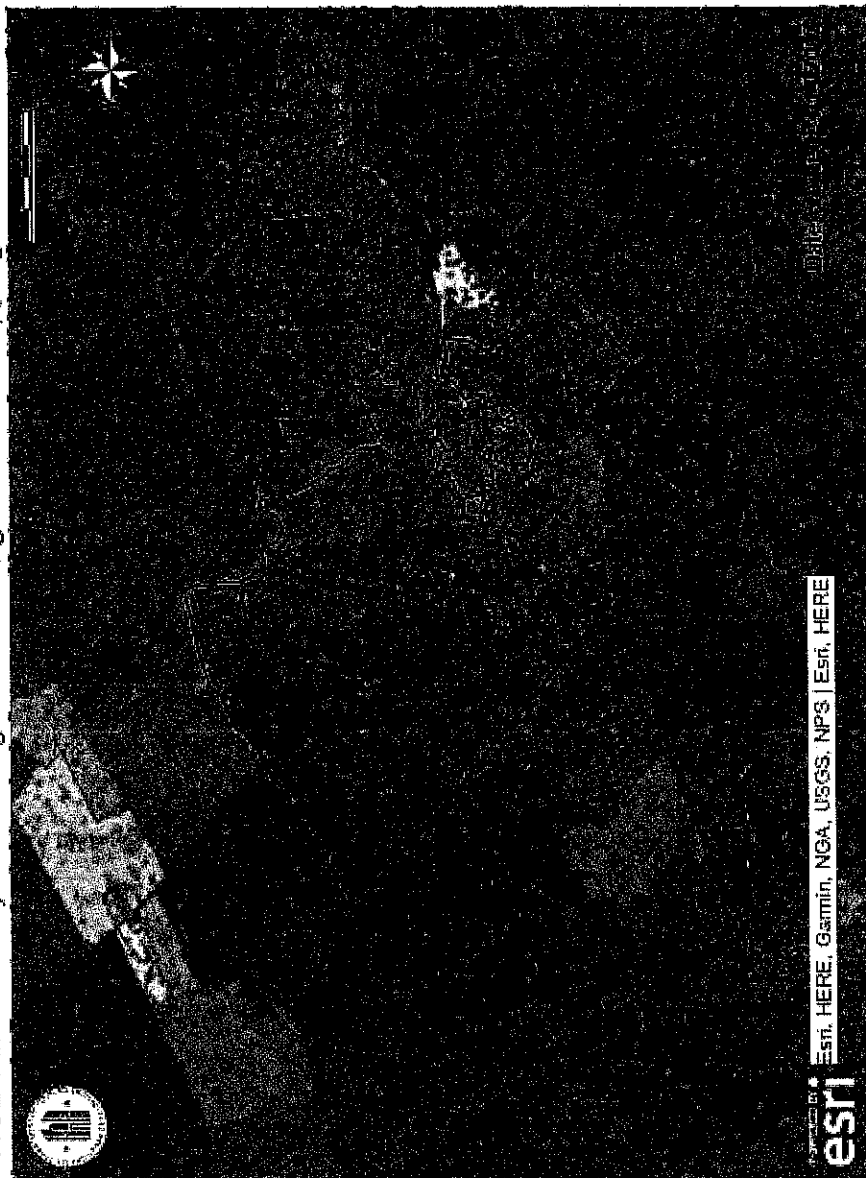
Source: AFFH Tool

Within Lehigh County, the Asian or Pacific Islander population (80.28th percentile) has the least exposure to poverty in a neighborhood, followed by the White population (76.87th percentile) and the Black/African-American population (72.59th percentile). The Native American racial cohort had the greatest exposure to poverty, although it is a very limited population which may skew the data. Per the data, the residents of Lehigh County have less exposure to poverty compared to the region as a whole. In the Allentown-Bethlehem-Easton PA-NJ MSA, the Hispanic (34.79) and Black (45.65) populations have the greatest exposure to poverty in a neighborhood.

The AFFH Map 12 (shown below) overlays Low Poverty Index with race/ethnicity, national origin, and familial status. In regard to race, the data displays a concentration of minorities within the adjacent City of Allentown and very low Index scores. However, the areas of Lehigh County with relatively high concentrations of minorities (i.e. Alburtis Borough, Macungie Borough, Upper Saucon, Whitehall (Fullerton CDP) and Whitehall Township (Hokendauqua CDP) all have average to high index scores for the Low Poverty Index, indicating less exposure to poverty.



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



- Jurisdiction**
- Demographics 2010
 - 1 Dot = 75 People
 - White, Non-Hispanic
 - Black, Non-Hispanic
 - Native American, Non-Hispanic
 - Asian/Pacific Islander, Non-Hispanic
 - Hispanic
 - Hispanic
 - Other, Non-Hispanic
 - Multi-racial, Non-Hispanic

- R/ECAP**
- Low Poverty Index**
- 0 - 10
 - 10.1 - 20
 - 20.1 - 30
 - 30.1 - 40
 - 40.1 - 50
 - 50.1 - 60
 - 60.1 - 70
 - 70.1 - 80
 - 80.1 - 90
 - 90.1 - 100

Name: Map 12 - Demographics and Poverty
Description: Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: Lehigh County (CDBG)
Region: Allentown-Bethlehem-Easton, PA-NJ



Environmental Health

The HUD AFFH Tool provides an **Environmental Health Index**, which summarizes potential exposure to harmful toxins at a neighborhood level using EPA estimates of air quality carcinogenic, respiratory, and neurological hazards. Values are inverted, whereas the higher the index value, the less exposure to toxins and better the environmental quality of a neighborhood/Census Block Group.

Table IV-30 – Environmental Health Index by Percentile

Race	Lehigh County	Allentown-Bethlehem-Easton PA-NJ MSA
White	39.92	44.92
Black/African-American	36.47	25.32
Hispanic	34.06	21.00
Asian or Pacific Islander	43.63	38.52
Native American	41.51	36.19

Source: AFFH Tool

The Environmental Health Index scores for individual racial and ethnic groups are relatively close to each other within Lehigh County, with no group disproportionately affected by environmental health issues. The Asian (43.63) and Native American (41.51) populations are exposed to less toxins than other racial cohorts in the County, but not by a large margin.

With the exception of the White population in Lehigh County, all other racial groups have higher scores than compared to the Allentown-Bethlehem-Easton PA-NJ MSA. The Hispanic and Black/African-American populations have the lowest Environmental Health Index scores in both the County and region, indicating they live in neighborhoods with more toxins than other racial groups. The Environmental Health Index is a percentile ranked nationally with all scores being well-below 50, while the environmental health of the region has an above-average amount of toxins harmful to human health.



**Table IV-31 – Environmental Health Index for
Population Below Federal Poverty Line**

Race	Lehigh County	Allentown-Bethlehem- Easton PA-NJ MSA
White	39.31	38.59
Black/African-American	29.49	16.07
Hispanic	27.52	15.99
Asian or Pacific Islander	41.51	27.99
Native American	21.00	19.74

Source: AFFH Tool

The table above shows the Environmental Health Index numbers for the population below the Federal Poverty Line. As all scores across all racial groups in both the County and the region decrease, it is clear that low-income households are located in neighborhoods with a greater exposure to harmful toxins. In particular, most of the racial groups in the Allentown-Bethlehem-Easton PA-NJ MSA that live under the Federal Poverty Line have more exposure to environmental toxins than the population below the Federal Poverty Line in Lehigh County.

HUD AFFH Map 13 (shown below) illustrates the data provided in the previous table, overlaying racial/ethnic, national origin, and familial status over the Environmental Health Index Score. The Black/African-American population and the Hispanic population have slightly lower scores.



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Jurisdiction



Demographics 2010

1 Dot = 75 People

White, Non-Hispanic

Black, Non-Hispanic

Native American, Non-

Hispanic

Asian/Pacific Islander, Non-

Hispanic

Hispanic

Other, Non-Hispanic

Multi-racial, Non-Hispanic

R/IECAP



Environmental Health Index

0 - 10

10.1 - 20

20.1 - 30

30.1 - 40

40.1 - 50

50.1 - 60

60.1 - 70

70.1 - 80

Esri, HERE, Garmin, NGA, USGS, NPS, Esri, HERE, ...

esri

Name: Map 13 - Demographics and Environmental Health

Description: Environmental Health Index with race/ethnicity, national origin, family status and R/IECAPs

Jurisdiction: Lehigh County (CDBG)

Region: Allentown-Bethlehem-Easton, PA-NJ



While there are relatively high minority concentrations in the areas of Macungie Borough, Upper Macungie Township (Breinigsville CDP), and Alburtis Borough, the Environmental Index Scores for these Census Tracts are fairly high compared to the rest of Lehigh County. However, the areas of Slatington Borough, Whitehall Township (Fullerton CDP), and Catasauqua Borough also have high concentrations of Hispanics and Black/African-Americans (albeit at a lower level) but have lower-than average scores compared to the County as a whole; these areas may have higher exposure to toxins due to their location near urban centers, in particular, the City of Allentown.

The neighborhoods with the highest environmental health index levels in the County include: Washington Township (Slatedale CDP), which is predominantly White; Alburtis Borough, which has clusters of Black and Hispanic populations; Upper Macungie Township (Breinigsville CDP), which has clusters of Hispanic, Black, and Asian populations; and Upper Macungie Township (Zionsville CDP), which is predominantly White.

Exposure to lead, which can cause intellectual, behavioral, and academic deficits, is another contributing factor to environmental quality of an area. The U.S. Centers for Disease Control and Prevention (CDC) defined an elevated blood lead level (EBLL) as a blood level (BLL) ≥ 5 micrograms per deciliter ($\mu\text{g/dL}$). The Pennsylvania Department of Health's 2015 Childhood Lead Surveillance Annual Report showed that out of 140,147 children aged 0-71 months that were tested, 9,689 or 6.92% had elevated blood lead levels greater than 5 $\mu\text{g/dL}$. Out of 25,775 children tested in Lehigh County (including Allentown), 3,555 or 5.74% were found to have elevated blood lead levels greater than 5 $\mu\text{g/dL}$. Lead exposure is typically due to the presence of lead based paint in homes constructed prior to 1978 and unabated for lead based paint.

Lehigh County has seven (7) contaminated areas designated as "Superfund Sites" and placed on the National Priorities List for clean-up. These sites are:

- Dorney Road Landfill, Upper Macungie Township, PA 19539



- Hebelka Auto Salvage Yard, Weisenberg Township, PA 18062
- Heleva Landfill, North Whitehall Township, PA 18037
- Novak Sanitary Landfill, South Whitehall Township, PA 18104
- Reeser's Landfill, Upper Macungie Township, PA 18051
- Rodale Manufacturing Co., Inc., Emmaus Borough, PA 18049
- Voortman Farm, Upper Saucon Township, PA 18034

These Superfund sites are located in various areas of Lehigh County. While Weisenberg Township and North and South Whitehall Townships have only moderate minority concentrations and poverty levels, the remaining four (4) contaminated areas are located in areas with higher concentrations of minorities and higher levels of poverty.

The neighborhoods with lower environmental health index levels are located adjacent to the urban centers in Lehigh County, most notably the City of Allentown and Slatington Borough. The more developed areas in Lehigh County have greater access to public transportation and thus have greater percentages of low-income residents. Lehigh County and the LCHA have encouraged the location and development of affordable housing in areas of high opportunity, often the neighborhoods with higher environmental health index scores.

Access to Opportunity

Based on the data and maps provided in the HUD AFFH Tool, Lehigh County and LCHA can determine a general understanding of what areas of the County have higher access to opportunity; this includes greater transit access, better education opportunities, greater access to jobs, and healthier environments.

The Low Poverty Index Table presented in Table IV-29 (page 184) provides different measurements in which to compare Lehigh County with the surrounding Allentown-Bethlehem-Easton PA-NJ MSA. The data suggests that Lehigh County provides greater access to opportunity in school performance, labor market, jobs index, and environmental health than the region as a whole. However, the Allentown-Bethlehem-Easton PA-NJ MSA provides greater access to transportation options and lower transit costs.



According to the AFFH HUD Map 13 (page 188), the areas with high access across multiple opportunity indicators include the boroughs and townships along the I-78 corridor west of the City of Allentown, most notably the Townships of Weisenberg, North Whitehall Township, and Macungie Borough.

The more affluent areas of Lehigh County are typically predominantly White and located away from the City of Allentown; these areas include Lynn Township (including New Tripoli CDP), Coopersburg Borough, parts of Lower Macungie Township and North Whitehall Township (Ancient Oaks CDP). In addition to having lower concentrations of poverty, these areas seem to have greater access to proficient schools and less exposure to environmental health hazards when compared to the townships and boroughs adjacent to the City of Allentown and southwest Lehigh County. The more developed areas of Emmaus Borough, Macungie Borough, Slatington Borough, Whitehall Township (Fullerton CDP), and Catasauqua Borough have greater access to transportation and labor markets, but have more exposure to environmental health hazards and lack as many proficient schools.

Lehigh County's many boroughs and townships provide varying degrees of opportunity to its residents; opportunities are not equally accessible to residents of all races but Allentown has greater disparities in accessibility than Lehigh County. Most HUD opportunity indices favor Lehigh County when compared to the City of Allentown, which has a predominantly minority population and a higher level of poverty.

18. Section 3

HUD's definition of Section 3 is:

Section 3 is a provision of the Housing and Urban Development Act of 1968. The purpose of Section 3 to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low- and very low income



persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons.

The following are the guidelines that Lehigh County uses to accomplish Section 3 compliance:

- Lehigh County's Section 3 Plan is implemented in two phases. The first phase comprises the development of necessary procedures and tools needed to ensure standardized operations within its Community Development Office, and guidelines for developers, contractors and subcontractors. The second phase comprises training, outreach and recruitment.
- The County has three primary tools to ensure Section 3 Compliance. The County utilizes Section 3 Language in RFPs, RFQs, Invitations to Bid, and Notices of Funding Availability. When a contract or project is put out for bid, as part of the bid-package, the advertisement contains the Section 3 information describing the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended: 12 U.S.C. 1701U (Section 3). The first three pages of this five-page document are the actual wording of Section 3, including 25 CFR Part 135. This requires all proposals and bids to contain a completed Section 3 and Equal Opportunity Contracting Utilization Plan. A contractor's or subcontractor's Section 3 participation is evaluated through the Approved Plan Approach checklist.
- **Phase One:** Lehigh County has developed administrative procedures to aid in the implementation of its Section 3 Plan. The County has compiled examples of efforts to award contracting opportunities to Section 3 Business Concerns and MBE/WBE local area businesses and examples of procurement procedures that provide preference for Section 3 Business Concerns for distribution to interested contractors. The County has also developed a Section 3 Contractors Guide, a Section 3 Resident Certification, and a Frequently Asked Questions (FAQ) to aid contractors in achieving Section 3 compliance.



- **Phase Two:** Lehigh County conducts internal and external trainings to educate its governmental departments and targeted local organizations about Section 3. The County has established partnerships with local organizations to develop business development and training programs to target low-income individuals and disadvantaged businesses to recruit and certify Section 3 Business Concerns or as Section 3 Residents.
- The County administers a certification program for Section 3 residents to meet the qualifications for a Section 3 business, or that a business meets the qualifications for Section 3 hiring through direct employment or subcontractors.

During the preparation of this Analysis of Impediments study, no impediments or complaints were mentioned or filed based on the HUD Section 3 Requirements.

C. Private Sector

The private sector has traditionally been the greatest impediment to fair housing choice in regard to discrimination in the sale, rental, or advertising of dwellings, the provision of brokerage services, or in the availability of financing for real estate purchases. The Fair Housing Act and local laws prohibits such practices as the failure to give the same terms, privileges, or information; charging different fees; steering prospective buyers or renters toward a certain area or neighborhood; or using advertising that discourages prospective buyers or renters because of race, color, religion, sex, handicap, familial status, national origin, and sexual orientation.



1. Real Estate Practices

The Greater Lehigh Valley REALTORS Association (GLVR) is a trade association that represents over 2,500 real estate professionals throughout Lehigh, Northampton, and Carbon Counties. Its mission is to enhance the ability of its members to



conduct business in a professional manner and to be an advocate for realtors and private property rights.

As a requirement for membership in the National Association of Realtors (NAR), all members must complete a mandatory ethics training and abide by the National Association of Realtor's Code of Ethics.

Article 10 of the NAR Code of Ethics states that Realtors "*shall not deny equal professional services to any person for reasons*



**GREATER
LEHIGH VALLEY
REALTORS®**

of race, color, religion, sex, handicap, familial status, national origin sexual orientation or gender identity. REALTORS® shall not be parties to any plan or agreement to discriminate against a person or persons on the basis of race, color, religion, sex, handicap, familial status, national origin, or gender identity."
<https://www.nar.realtor/sites/default/files/handouts-and-brochures/2007/Article-10-Updated-2014.pdf>

GLVR ensures that equal opportunities are available to everyone and it enforces a zero-tolerance policy on non-compliance of the Fair Housing Act. Additionally, GLVR recently signed the Greater Lehigh Valley Chamber of Commerce's Diversity and LGBT Business Council's Business Pledge, affirming that the Association and its affiliated real estate businesses are LGBT-friendly and will ensure the celebration of diversity and inclusiveness. Any questions that homebuyers or realtors may have related to Fair Housing or the Fair Housing Act can be directed to GLVR's Government Affairs Director.

The Greater Lehigh Valley REALTORS has a Diversity and Community Involvement Committee which assists in efforts to promote adherence to local, State, and Federal fair housing laws and develops programs to create broader understanding of cultural diversity issues among the members of the Association and their clients/customers and expand the diversity in GLVR's membership.

GLVR's website also provides links to the Pennsylvania Human Relations Commission and North Penn Legal Services, as well as



provides a list of words and phrases to avoid in listings that may be unlawful or discriminatory. North Penn Legal Services provides quarterly trainings to GLVR.

2. Newspaper/Magazine Advertising

Under Federal Law, no advertisement with respect to the sale or rental of a dwelling unit may indicate any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin. Under the Fair Housing Act Amendments, descriptions are listed in regard to the use of words, photographs, symbols, or other approaches that are considered discriminatory.



Real estate advertisements were reviewed from several real estate publications, including *The Morning Call*. None of the advertisements in these publications contained language that prohibited occupancy by any protected class.

3. Private Financing

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The annual HMDA data can be found online at www.ffiec.gov/hmda/ and is included in Part VII, Appendix C of this Analysis of Impediments. This analysis uses 2016 HMDA data to identify any discriminatory lending patterns between minority and non-minority households. The following two (2) tables provide an analysis of the HMDA data in the Allentown-Bethlehem-Easton PA-NJ Metropolitan Statistical Area (MSA).

It should be noted that the HMDA data pertains to the entire Allentown-Bethlehem-Easton PA-NJ MSA, which includes four (4) total counties (Lehigh, Northampton, Carbon, and Warren). While data for Lehigh County is highlighted where possible, there are many differences between the County and the



surrounding counties and municipalities that may provide some skewed outcomes.

The following table compares lending in Lehigh County to the Allentown-Bethlehem-Easton PA-NJ MSA. Lending in Lehigh County has been extracted from the MSA data based on census tract. Conventional loans in Lehigh County comprised 43.9% of the number of such loans in the MSA as a whole and 45.3% of the value of such loans.

Table IV-32 - HMDA Data Analysis for 2016

	Home Purchase Loans							
	FHA, FSA / RHS & VA		Conventional		Refinancing		Home Improvement Loans	
	#	\$ Amount*	#	\$ Amount*	#	\$ Amount*	#	\$ Amount*
Lehigh County	1,543	266,101	2,487	508,123	3,115	569,729	583	43,953
MSA/MD	3,705	656,447	5,659	1,122,439	7,508	1,386,898	1,430	111,488
% of metro area lending in Lehigh County	41.6%	40.5%	43.9%	45.3%	41.5%	41.1%	40.8%	39.4%

*Note: Amounts in thousands
Source: <https://www.ffiec.gov/hmda/>

The following table shows the conventional loan applications in **Lehigh County**. Approximately three-quarters (77.0%) of the loan applications in the County were originated, while slightly more than eight percent (8.3%) were denied. County applicants had a slightly higher origination rate than the MSA as a whole, comprising 43.9% of all loans originated but just 39.6% of denied applications.

**Table IV-33 - Disposition of Conventional Loans**

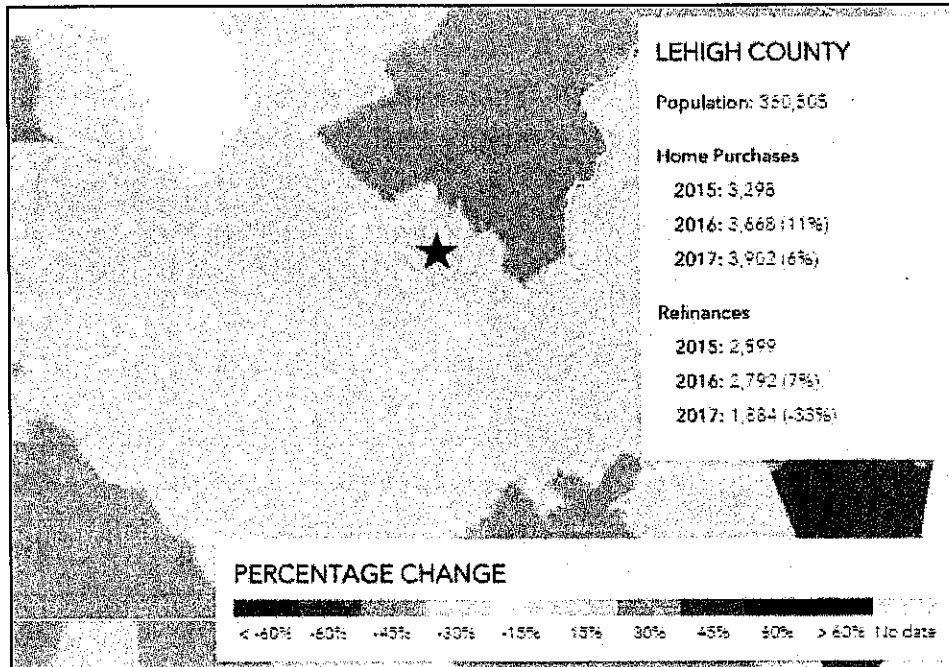
	Lehigh County		
	Count	% of Lehigh County Applications	% of Total MSA Applications
Loans Originated	2,487	77.0%	43.9%
Approved, Not Accepted	59	1.8%	34.9%
Applications Denied	269	8.3%	39.6%
Applications Withdrawn	362	11.2%	41.5%
File Closed for Incompleteness	54	1.7%	39.7%

Source: <https://www.ffiec.gov/hmda/>

The following data is available from the Consumer Financial Protection Bureau and are mapped to illustrate changes in mortgage volume between 2015 and 2016 (A) and between 2016 and 2017 (B). More people in Lehigh County applied for mortgages to buy homes in 2017 than in each of the two (2) prior years. This reflects a national trend. Refinancing volume in Lehigh County increased each year between 2015 and 2017.

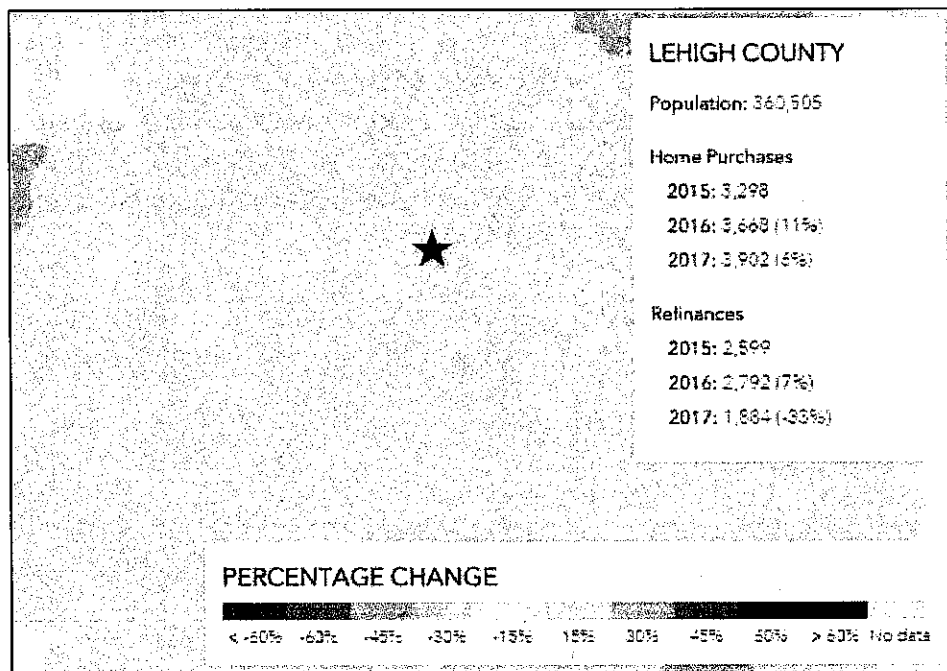


A) Change in Mortgage Volume – Lehigh County, PA 2015-2016



Source: Consumer Financial Protection Bureau

(B) Change in Mortgage Volume – Lehigh County, PA 2016-2017



Source: Consumer Financial Protection Bureau



The following table outlines the disposition of conventional loans in the **Allentown-Bethlehem-Easton PA-NJ MSA** by income level (data for only Lehigh County is not available). Loan applications from low-income households have the highest denial rates by a large margin, while upper-income households have the lowest denial rates and highest origination rates. The percentage of loans originated and percentage of applications denied are both correlated with income, whereas the higher the income level, the more likely the application will be approved and loan originated.

Table IV-34 - Disposition of Conventional Loans by Income Level in the Allentown-Bethlehem-Easton PA-NJ MSA – 2016

Income Level	Applications Received		Loans Originated		Applications Approved, Not Accepted		Applications Denied		Applications Withdrawn		Applications Withdrawn or Closed for Incompleteness	
	Count	% of Total	Count	% of Total Income Level	Count	% of Total Income Level	Count	% of Total Income Level	Count	% of Total Income Level	Count	% of Total Income Level
Less than 50% of MSA Median	578	8.0%	370	64.0%	9	1.6%	127	22.0%	59	10.2%	13	2.2%
50-79% of MSA Median	1,326	18.2%	949	71.6%	26	2.0%	173	13.0%	145	10.9%	33	2.5%
80-99% of MSA Median	838	11.5%	616	73.5%	24	2.9%	80	9.5%	106	12.6%	12	1.4%
100-119% of MSA Median	872	12.0%	669	76.7%	15	1.7%	50	5.7%	128	14.7%	10	1.1%
120% or More of MSA Median	3,655	50.3%	2,855	78.1%	87	2.4%	233	6.4%	416	11.4%	64	1.8%
Total	7,269	100.0%	5,459	75.1%	161	2.2%	663	9.1%	854	11.7%	132	1.8%

Source: <https://www.ffiec.gov/hmda/>



The following tables IV-35, IV-36, IV-37, IV-38, and IV-39 show the disposition of conventional loans disaggregated by minority status and income level for the **Allentown-Bethlehem-Easton PA-NJ MSA**. The number of applications for conventional loans submitted by White applicants outnumbers minority applicants in each income level analyzed. White applicants have a higher origination rate and lower denial rate of conventional loans than minority applicants in all income categories.

Table IV-35 - Conventional Loan Disposition Rates by Minority Status, Less than 50% of MSA Median Income

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
White, Non-Hispanic	379	70.45%	250	65.96%	8	2.11%	71	18.73%	39	10.29%	11	2.90%
Minority, Including Hispanic	159	29.55%	100	62.89%	0	0.00%	43	27.04%	14	8.81%	2	1.26%
Total	538	100.00%	350	65.06%	8	1.49%	114	21.19%	53	9.85%	13	2.42%

Source: <https://www.ffiec.gov/hmda/>

The number of White, Non-Hispanic applicants, in this income category significantly outnumbers the number of minority applicants, including Hispanic applicants have a slightly lower origination rate and a much higher denial rate than White applicants with income less than 50% of the MSA median income.



**Table IV-36 - Conventional Loan Disposition Rates by
Minority Status, 50-79% of MSA Median Income**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Received Minority Status	Applications Approved but Not Accepted	% of Received Minority Status	Applications Denied	% of Received Minority Status	Applications Withdrawn	% of Received Minority Status	Applications Closed for Incompleteness	% of Received Minority Status
White, Non-Hispanic	962	79.90%	717	74.53%	20	2.08%	109	11.33%	94	9.77%	22	2.29%
Minority, Including Hispanic	242	20.10%	159	65.70%	5	2.07%	44	18.18%	28	11.57%	6	2.48%
Total	1,204	100.00%	876	72.76%	25	2.08%	153	12.71%	122	10.13%	28	2.33%

Source: <https://www.ffiec.gov/hmda/>

The number of White, Non-Hispanic applicants in this income category significantly outnumbers the number of minority applicants. Minority, including Hispanic households have a lower origination rate and a higher denial rate.



**Table IV-37 - Conventional Loan Disposition Rates by
Minority Status, 80-99% of MSA Median Income**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
White, Non- Hispanic	647	84.80%	494	76.35%	19	2.94%	51	7.88%	73	11.28%	10	1.55%
Minority, Including Hispanic	116	15.20%	74	63.79%	2	1.72%	20	17.24%	18	15.52%	2	1.72%
Total	763	100.00%	568	74.44%	21	2.75%	71	9.31%	91	11.93%	12	1.57%

Source: <https://www.ffiec.gov/hmda/>

In Table IV-37, the number of White, non-Hispanic applicants in this income category significantly outnumbers the number of minority applicants. Minority, including Hispanic households have a lower origination rate and a higher denial rate.



**Table IV-38 - Conventional Loan Disposition Rates by
Minority Status, 100-119% of MSA Median Income**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
White, Non- Hispanic	646	82.61%	513	79.41%	13	2.01%	34	5.26%	81	12.54%	5	0.77%
Minority, Including Hispanic	136	17.39%	97	71.32%	2	1.47%	11	8.09%	22	16.18%	4	2.94%
Total	782	100.00%	610	78.01%	15	1.92%	45	5.75%	103	13.17%	9	1.15%

Source: <https://www.ffiec.gov/hmda/>

In Table IV-38, the number of White, non-Hispanic upper-income applicants significantly outnumbers the number of minority applicants. In this income category, minority applicants have a lower origination rate and a higher denial rate to white applicants.



Impediments to Fair Housing 2018

Table IV-39 - Conventional Loan Disposition Rates by
Minority Status, 120% or More of MSA Median Income

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
White, Non- Hispanic	2,812	85.24%	2,250	80.01%	67	2.38%	150	5.33%	302	10.74%	43	1.53%
Minority, Including Hispanic	487	14.76%	348	71.46%	13	2.67%	37	7.60%	72	14.78%	17	3.49%
Total	3,299	100.00%	2,598	78.75%	80	2.42%	187	5.67%	374	11.34%	60	1.82%

Source: <https://www.ffiec.gov/hmda/>

In Table IV-39, the number of White, non-Hispanic applicants in this income category significantly outnumbered the number of minority applicants. Compared to white applicants, minority, including Hispanic applicants have a lower origination rate and a slightly higher denial rate.



2018 Analysis of Impediments to Fair Housing

Impediments to Fair Housing 2018



The following Table IV-40 offers a closer look at the denial rates of conventional loans by denial reason and income level. For applicants earning up to 99% of median income, the most common reason for denial is debt-to-income ratio, followed by credit history and/or collateral. Overall, the most common reason for denial of conventional loans in the Allentown-Bethlehem-Easton PA-NJ MSA is debt-to-income ratio (26.21%), followed by collateral (21.53%) and credit history (15.44%).

Table IV-40 - Conventional Loan Denial Rates by Denial Reason and Income Level

	Less than 50% Low		50-79% Middle		80-99% Upper- Middle		100-119% Upper		120% or More High		Income Not Available		Total Denials	
	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Total
Debt- to-Income Ratio	51	41.13%	46	30.07%	17	24.64%	10	23.81%	39	16.60%	5	27.78%	168	26.21%
Employment History	3	2.42%	4	2.61%	1	1.45%	3	7.14%	4	1.70%	1	5.56%	16	2.50%
Credit History	22	17.74%	22	14.38%	16	23.19%	6	14.29%	26	11.06%	7	38.89%	99	15.44%
Collateral	16	12.90%	32	20.92%	12	17.39%	11	26.19%	66	28.09%	1	5.56%	138	21.53%
Insufficient Cash	15	12.10%	15	9.80%	4	5.80%	2	4.76%	18	7.66%	1	5.56%	55	8.58%
Unverifiable Information	4	3.23%	3	1.96%	5	7.25%	2	4.76%	16	6.81%	0	0.00%	30	4.68%
Credit Application Incomplete	3	2.42%	13	8.50%	2	2.90%	4	9.52%	33	14.04%	1	5.56%	56	8.74%
Mortgage Insurance Denied	0	0.00%	0	0.00%	2	2.90%	0	0.00%	2	0.85%	0	0.00%	4	0.62%
Other	10	8.06%	18	11.76%	10	14.49%	4	9.52%	31	13.19%	2	11.11%	75	11.70%
Total Denials and % of Total	124	19.34%	153	23.87%	69	10.76%	42	6.55%	235	36.66%	18	2.81%	641	100.00%

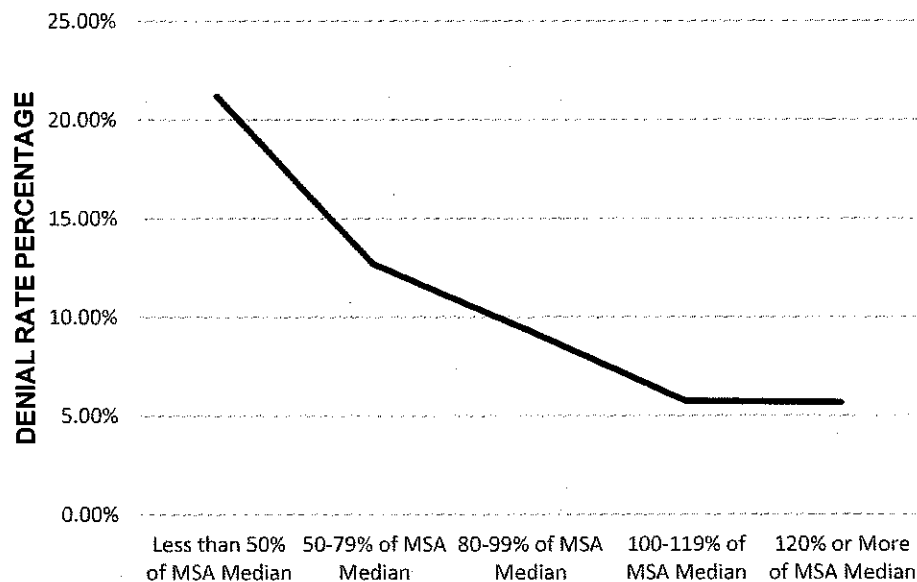
Source: <https://www.ffiec.gov/hmda/>



In summary, the HMDA data shows that approximately three-quarters (77.0%) of conventional loan applications in the Lehigh County were originated, while just more than eight percent (8.3%) were denied. County applicants had a slightly higher origination rate than that of the Allentown-Bethlehem-Easton PA-NJ MSA as a whole, comprising 43.9% of all loans originated but just 39.6% of denied applications.

In the Allentown-Bethlehem-Easton PA-NJ MSA, the number of white applicants exceeds the number of minority applicants. Additionally, the origination rates are higher and denial rates lower for 'White' applicants than for 'Minority, including Hispanics' in every income category. As incomes decrease, denial rates increase, often due to these applicants being first-time homebuyers with little to no collateral, poor credit history, and debt. While denial rates decrease as income increases, minorities have higher denial rates even within the same income groups.

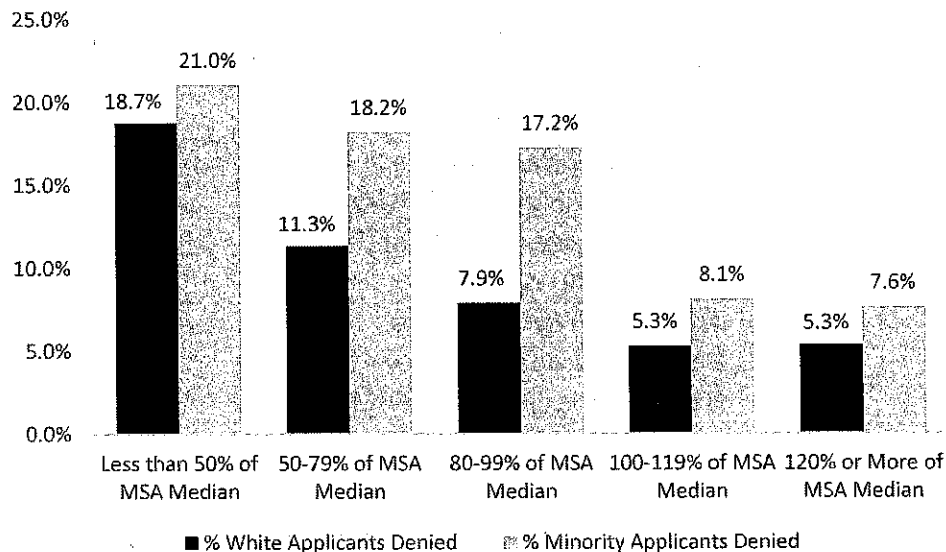
**Chart IV-5 – Conventional Loan
Application Denial Rate by Income**



Source: <https://www.ffiec.gov/hmda/>



**Chart IV-6 – Conventional Loan Application
Denial Rate by Income and Race**



Source: <https://www.ffiec.gov/hmda/>

Based on this data analysis, there is the possibility that there are discriminatory lending practices in the MSA, as there are disparities between the origination and denial rates of minority and non-minority households. In every income category, White applicants have a higher loan origination rate and a lower denial rate than minority applicants. While denial rates decrease as income increases, minorities have higher denial rates even within the same income groups.

While this data provides an insight into lending patterns in the Allentown-Bethlehem-Easton PA-NJ MSA, it should be noted that data unique to the Lehigh County level would yield more conclusive findings and provide a more accurate understanding of any existing lending issues in Lehigh County. However, this data is not available.

D. Citizen Participation

The Lehigh County Department of Community and Economic Development and the Lehigh County Housing Authority undertook a broad participation strategy for this Analysis of Impediments to Fair Housing Choice to engage as many individuals, organizations, and agencies as possible.



Stakeholders: Lehigh County and LCHA developed a list of stakeholders with direct knowledge of, and experience in, the housing market and issues affecting fair housing. Identified stakeholders were divided into the following categories:

- Public Housing Authorities
- Advocacy Organizations
- Direct Housing Stakeholders
- Social Service Providers
- Fair Housing Agencies
- Transportation Agencies
- Planning Organizations
- Banks/Mortgage Companies
- Redevelopment Authorities

Agency/Organization/Stakeholder Meetings: Lehigh County and LCHA contacted all identified organizations and agencies to set up smaller meetings consisting of similar organizations to hold more in-depth conversations.

- Housing Authorities – June 5, 2017 (Lehigh County Government Center)
- Advocacy Organizations – June 5, 2017 (Lehigh County Government Center)
- Direct Housing Stakeholders – June 5, 2017 (Lehigh County Government Center)
- Social Service Providers – June 5, 2017 (Lehigh County Government Center)
- Public Housing Residents and Section 8 Voucher Holders – June 5, 2017 (Lehigh Valley Planning Commission)
- Lehigh County Officials – June 6, 2017 (Lehigh Valley Planning Commission)
- Planning Organizations – June 6, 2017 (Lehigh County Government Center)
- Local Fair Housing Advocacy Organizations – June 6, 2017 (Lehigh County Government Center)
- Transportation Groups – June 6, 2017 (Lehigh County Government Center)
- CDBG Communities – June 6, 2017 (Lehigh County Government Center)



- Banks/Mortgage Companies – June 6, 2017 (Lehigh County Government Center)

Any identified stakeholders that were not available to attend the meeting, as well as some of the aforementioned stakeholders, were then called to either (1) follow-up if they partook in either of the Community Meetings or (2) discuss fair housing issues with agencies/individuals who were unable to attend one of the Public Meetings.

Public Meetings: Lehigh County and the Lehigh County Housing Authority also 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.

While there was limited attendance at the two (2) public meetings, the twelve (12) scheduled meetings with various government staff, social service organizations, housing agencies, realtors, and banks were well-attended. Public Meetings were advertised in the “Morning Call,” the largest English-language newspaper in circulation in the area, and “El Torero” (Spanish) newspapers, flyers were distributed in both English and Spanish, and notices and flyers were sent out to various organizations.

- LCHA posted the Public Meeting flyers in the following Housing Authority office locations:
 - 635 Broad Street, Emmaus, PA 18049
 - 860 Broad Street, Emmaus, PA 18049
 - 120 North Third Street, Emmaus, PA 18049
 - 425 Kuntz Street, Slatington, PA 18080
 - 1101 Seneca Street, Bethlehem, PA 18015
- Lehigh County posted the fliers in the following physical and online locations:
 - The County kiosk
 - The Lehigh County Facebook page
 - The Lehigh County website
- Lehigh County emailed Public Meeting and Stakeholder Meeting invitations to:
 - Advocacy Agencies
 - Banking Institutions
 - CDBG Communities



- County Commissioners
- Fair Housing Agencies
- Housing Agencies
- Housing Authorities
- Planning Agencies
- Social Service Agencies
- Transportation Agencies

Additional Outreach: Lehigh County and LCHA also employed the following to encourage extensive engagement and participation:

- LCHA distributed English and Spanish Surveys in all correspondences that were mailed to Lehigh County residents between May 18, 2017 and July 15, 2017.
- Invitations to the stakeholder meetings were sent out by LCHA prior to the meetings (June 5th and June 6th).
- 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.

Outreach to Persons with Disabilities: Lehigh County and LCHA held meetings with the Lehigh Valley Center for Independent Living and the Center for Vision Loss to obtain an understanding of the issues affecting persons with disabilities. Additionally, a phone interview was completed with the Lehigh Valley Partnership for a Disability Friendly Community.

Resident Surveys: Links to the Fair Housing Survey were posted on Lehigh County's website. The survey was available online in both English and Spanish and physical copies were placed on public display to encourage resident input. 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. Actions to spread knowledge of the surveys included posting the survey on Lehigh County's Facebook page and emailing the link to interested parties. The information provided in these anonymous surveys were crucial in developing an accurate assessment of fair housing issues in the County.

The following is a summary of the 194 responses received:



Notable Characteristics

Some of the notable characteristics of respondents included (as a percentage of those that answered each question):

- The majority of respondents are female at 67.63%.
- The vast majority (86.13%) of respondents are White.
- Over two-thirds of the respondents were over the age of 61 (68.57%).
- Of those that answered the question, 86.9% were low- to moderate-income for their family size.
- The majority, at 59.5%, come from one person households.
- 33.73% are homeowners.
- 22.22% of respondents felt that residents of the County did not know how to report fair housing violations, and a further 57.64% were unsure whether residents know or do not know how to report violations.

The following is a list of needs/issues associated with different areas of community and economic development. Values were calculated as a percentage of those that answered each question.

Accessibility:

- 79.33% of respondents believe that there are no problems with handicap accessibility with public facilities in buildings in the County.
- 17.02% believe there are not enough ramps leading to public facilities throughout the County.

Employment:

- Only 20.77% of respondents indicated that there are employment issues in the County.
- 14.63% specifically mention that there are not enough jobs in Lehigh County.
- 23.02% believe that employment programs or services are needed, particularly those that match residents with jobs, or train residents in the fields that are expanding within the County.

Housing:

- 35.77% said that there are housing issues within Lehigh County, and 37.61% believe that housing programs or services are needed.
- 17.86% specifically mention the need for low-income housing.
- 14.29% are concerned with more senior-centric housing for residents.
- 8.93% are concerned with taxes, high housing prices, and rents.



- Other housing issues, needs, and programs include parking for seniors, rental assistance for low-income households, and housing that can fit families.

Fair Housing:

- 60.61% are aware that residents can make reasonable housing accommodation requests to their landlords.
- However, only 43.70% were aware of who to contact regarding a fair housing complaint or issue, compared to 28.15% who did not, and 28.89% who were unsure of who to contact.

Reasons Fair Housing Complaints Are Not Reported:

- 30.99% specifically mention fear of retaliation, including eviction, legal reprisal, poor retreatment, and even deportation.
- 24.29% point to a lack of knowledge in reporting practices as a cause.
- The remaining 44.72% of respondents were not sure.

Transportation:

- 38.14% of respondents stated that there are problems or issues with public transportation in Lehigh County.
- 41.4% of residents that responded believe that improvements could be made to the bus system in particular
- 20.46% of residents cited other transportation concerns including an expansion of current routes, buses with bathrooms for the elderly, and more door-to-door service for seniors with less wait-times.

Public Schools:

- 23.08% of respondents believe there is a relationship between certain neighborhoods and public schools that perform below average, compared to 20.00% that do not believe there is a relationship, and 56.92% that are unsure
- 41.4% of residents that responded believe that improvements could be made to the school bus system in particular

The following Table IV-41 illustrates the types of situations that may result in further discriminations and/or barriers to fair housing in Lehigh County:



**Table IV-41 – Resident Survey Results**

	Strongly Agree	Agree	Neutral / Unsure	Disagree	Strongly Disagree
Concentration of subsidized housing in certain neighborhoods	14.18%	17.16%	61.19%	5.22%	2.24%
Lack of affordable housing in certain areas	21.58%	25.90%	46.76%	3.60%	2.16%
Lack of accessible housing for persons with disabilities	19.72%	23.94%	46.48%	8.45%	1.41%
Lack of accessibility in neighborhoods (i.e. curb cuts)	18.12%	18.12%	51.45%	8.70%	3.62%
Lack of fair housing education	15.11%	25.90%	53.24%	3.60%	2.16%
Lack of fair housing organizations in the County	14.29%	20.71%	57.14%	5.71%	2.14%
State or local laws and policies that limit housing choice	13.77%	19.57%	59.42%	5.80%	1.45%
Lack of knowledge among residents regarding fair housing	17.14%	32.86%	44.29%	4.29%	1.43%
Lack of knowledge among landlords and property managers regarding fair housing	17.86%	20.00%	52.14%	8.57%	1.43%
Lack of knowledge among real estate agents regarding fair housing	11.51%	12.95%	64.03%	8.63%	2.88%
Lack of knowledge among bankers/lenders regarding fair housing	10.79%	15.83%	64.03%	7.19%	2.16%
Other barriers	13.53%	13.53%	67.67%	3.01%	2.26%

Source: Citizen Survey

Additional Comments or Concerns:

Typical responses included:

- “Disability access is often overlooked or singularly focused when discussing fair housing needs. Disability access means more than just providing ramps and roll-in showers. A disability can be a medical condition, a sensory loss (hearing or vision), mental, cognitive, or intellectual.”



- "People with disabilities face additional discrimination in housing because they can identify with multiple protected class factors; for example, a single mother of three (3) who is African American and uses a wheelchair."
- "Curb cuts in sidewalks are too steep for people in scooters or motorized wheelchairs. I understand that these things are limited in the kind of ramp that can be placed, but many feel unsafe using them."
- "Concerning fair housing education, there are speakers that come into the building. They help out and I find that interesting and helpful."

Public Meeting on the Draft AI Public Comments

Lehigh County's 2018-2022 Analysis of Impediments to Fair Housing Choice was made available for public comment on Lehigh County's website (<https://www.lehighcounty.org/Departments/Community-Economic-Development>) and at Lehigh County's Department of Community and Economic Development located in Room 519 in the Lehigh County Government Center, 17 South Seventh Street, Allentown, PA 18101.

The document was on public display for a period of thirty (30) days. Residents were encouraged to submit written or oral feedback on the Analysis of Impediments.

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

- **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.
 - The lack of water & sewer lines 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 and 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 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.
- The County can suggest and encourage the municipalities to bring their zoning and land development regulations in compliance with the Fair Housing Act, however the municipalities have the ultimate authority for zoning and land development.
- 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 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.
 - Renters and homebuyers may be "steered" away from certain properties or denied financing or discriminated against.

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.



V. Actions and Recommendations

The following impediments to fair housing choice and recommendations are presented to assist Lehigh County to affirmatively further fair housing in the County. The previously identified impediments to fair housing choice were discussed in Section III and progress was reported for each impediment. New and carried over impediments to Fair Housing Choice are presented on the pages that follow. Of the previously identified impediments, racial segregation, a lack of accessible housing, and economic barriers for racial and ethnic minorities are still present in Lehigh County, despite the County's best efforts, and based on economic conditions, will continue to be addressed by Lehigh County and the LCHA.

Below is a list of impediments that were developed by Lehigh County and the Lehigh County Housing for the shared 2018 Analysis of Impediments to Fair Housing Choice.

A. Impediments to Fair Housing Choice

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 (LCTI) to develop training programs for unemployed and underemployed persons in the County.



B. Activities and Recommendations to Affirmatively Further Fair Housing

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

1. The County has appointed a Fair Housing Officer. Responsibilities include accepting complaints, record keeping, investigation in conjunction with NPLS, and the coordination of the preparation of the AFH.
2. Continue to enlist NPLS in the enforcement of fair housing through public education and outreach.
3. Continue to fund fair housing providers to report housing discrimination complaints.
4. Continue to investigate testing and auditing of fair housing practices through its regional fair housing providers.
5. Educate and attempt to overcome any remaining "Not in My Back Yard" attitudes in the County through its fair housing providers.
6. Continue to make every attempt to increase geographic choice in housing by providing links on its website for its low-income households.
7. Promote integration of public housing.
8. Update its fair housing section on the County website with news and items regarding fair housing (i.e. links to fair housing providers to report housing discrimination).
9. Assist in the organization of a Federally supported community-based system (such as LANta) that organizes key elements in its community to direct attention to, and help develop strategies to affirmatively further fair housing.
10. On an annual basis, Lehigh County will continue to declare April to be Fair Housing Month via proclamation, in conjunction with holding an annual fair housing workshop with partners.
11. Outreach to the public by providing updated housing discrimination information.



12. Continue to provide funding through its Affordable Housing Trust Fund to the Fair Housing Consortium and attend multiple-jurisdictional quarterly meetings.
13. Work with the PA Human Relations Commission.

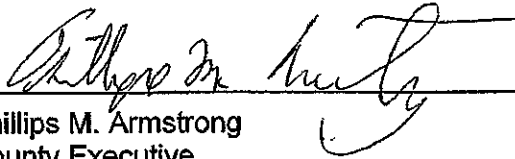


VI. Certification

Signature Page:

I hereby certify that this 2018-2022 Analysis of Impediments to Fair Housing Choice is in compliance with the intent and directives of the Community Development Block Grant (CDBG) Program regulations.

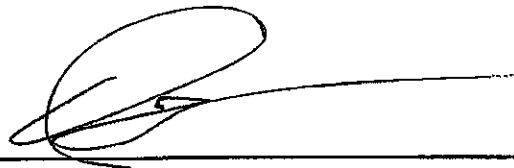
Lehigh County, PA:



Phillips M. Armstrong
County Executive

February 24, 2019
Date

Lehigh County Housing Authority, PA:



Daniel C. Beers
Executive Director

2/26/2019
Date

