

FIVE-YEAR CONSOLIDATED PLAN
2012-2016
LEHIGH COUNTY, PENNSYLVANIA



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COUNTY OF LEHIGH

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FIVE-YEAR STRATEGIC PLAN

COUNTY OF LEHIGH

		Attachments found at end of Annual Plan	
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Five-Year Strategic Plan



This document includes Narrative Responses to specific questions to which grantees of the Community Development Block Grant, HOME Investment Partnership, Housing Opportunities for People with AIDS and Emergency Shelter Grants Programs must respond in order to be compliant with the Consolidated Planning Regulations.

Name of Jurisdiction: Lehigh County, PA
CP Time Period: 2012 - 2016

GENERAL

EXECUTIVE SUMMARY

The Executive Summary is required. The Summary must include the objectives and outcomes identified in the plan and an evaluation of past performance.

Five-Year Strategic Plan Executive Summary:

Lehigh County, Pennsylvania has prepared a Five-Year Strategic Plan in order to strategically implement federal programs that fund housing and community and economic development activities within the participating municipalities. Throughout this document, countywide refers to the Urban County, those municipalities that participate in the County's CDBG program. The cities of Allentown and Bethlehem have their own Community Development Block Grant (CDBG) entitlement grants and therefore, unless otherwise specified, are not included in discussions that refer to countywide. Through a collaborative planning process involving a broad range of public and private agencies, the County has developed a consolidated planning and application document for the use of federal entitlement CDBG program funds and other funds. Lehigh County will submit this Five-Year Strategic Plan to the U.S. Department of Housing and Urban Development (HUD).

The Five-Year Strategic Plan for Lehigh County will serve the following functions.

- A planning document that enables the County to view its HUD funding, not in isolation, but as one tool in a comprehensive strategy to address housing, community development, and economic development needs.
- An application for CDBG program funds under HUD's formula grant.
- A strategy document to be followed in carrying out HUD programs.
- An action plan that provides a basis for assessing performance in carrying out use of CDBG program funds.

The amount of CDBG funding anticipated to be available is approximately \$1.1 million for each of the next five years. HUD has established the following three overarching objectives for guiding the use of federal resources:

- Providing decent affordable housing
- Creating suitable living environments
- Creating economic opportunities

Outcomes show how programs and activities benefit a community or the people served. The three outcomes that will illustrate the benefits of each activity funded by the CDBG program are:

- Improve availability/accessibility
- Improve affordability
- Improve sustainability

All future activities funded in the next five years will support at least one objective and one outcome.

The County's framework for realizing the objectives and outcomes include the following goals:

- Providing decent affordable housing
- Providing a suitable living environment
- Expanding economic opportunities
- Increasing homeownership
- Ending chronic homelessness

The goal of Lehigh County is to improve the quality of life for County residents by funding improvements to public facilities, infrastructure, and public services, and by retaining and increasing the stock of affordable owner and rental housing units. With this in mind, the following objectives have been established:

HOUSING GOALS

Maintain existing housing stock - Rehabilitate and stabilize the housing stock of both owner-occupied and renter-occupied units.

Unemployment has resulted in many homeowners being unable to maintain and/or retain their housing. The Countywide Housing Rehabilitation Program will be continued and, if additional funds are available, expanded. Developers, both public and private, will be encouraged to rehabilitate existing affordable rental housing.

The County's housing rehabilitation objectives are to:

- Rehabilitate 50 owner-occupied housing units
- Encourage the rehabilitation of 150 rental units that are affordable to lower income households.

The objective for stabilization of homeownership is to:

- Provide foreclosure mitigation counseling services to 150 households.

Development of affordable housing - Provide financial and technical assistance for the development of new housing and the rehabilitation of vacant housing. Such housing will provide opportunities for very low-income and low-income renters and low-income to moderate income homebuyers.

Municipalities are increasingly impacted by the foreclosure crisis and burdened with vacant housing units. Foreclosed and abandoned units contribute to blight and reduce tax revenue. Developers and municipalities will be encouraged to create programs and utilize available legislative and financial tools to address these issues.

The County's housing development objectives are to:

- Assist the development of 10 owner occupied housing units.
- Assist the development of 100 rental units that are affordable to lower income households.

Homebuyer's assistance - Provide down payment and closing cost assistance for low and moderate income homebuyers.

To help buyers purchase available units, assistance will be provided to close the gap between what households can afford and the cost of housing. Counseling will be integrated into such assistance as financial services have been shown to improve housing outcomes and stability.

The County's homebuyer assistance objective is to:

- Assist 20 lower income households achieve homeownership.

HOMELESS GOALS

Lehigh County is part of the Northeast Regional Housing Advisory Board (NE RHAB) service area. Through this 12-county Continuum of Care (COC), HUD provides funding for programs that address the needs of persons who are homeless and at risk of homelessness. The state provides support through federal funding for homeless shelters and homelessness prevention. The goals below reflect the plans of the regional COC.

Homelessness Prevention

- Provide rent and utility assistance to 50 households to prevent homelessness.
- Prevent homelessness through effective discharge planning from publicly-funded institutions.

Services

- Expand the capacity of local housing and service providers in rural areas to serve homeless families and individuals.
- Develop new resources for supportive services to supplement mainstream services.

Shelter and Transitional Housing

- Continue to meet the regional needs for shelter and transitional housing.
- Shorten the length of time individuals and families are homeless by 20% over five years.
- Reduce the recurrence of homelessness among sheltered families and individuals over the next five years.

Permanent Housing

- Expand permanent supportive housing for homeless individuals and persons in families with disabilities by creating 34 new permanent supportive housing units in the 12-county Continuum of Care.

Non-Homeless Special Needs

- Develop 15 units of housing for persons with special needs.

NON-HOUSING COMMUNITY DEVELOPMENT GOALS

Community Development Block Grant (CDBG) funds are directed to local municipalities to address the quality of life in low-income areas through infrastructure, economic development programs, and public facility improvements.

➤ **Public Facilities and Infrastructure**

- Assist municipalities with projects of community significance.
 - ✓ Clearance and demolition (two units)
 - ✓ Sewer, water improvements (eight projects)
 - ✓ Storm sewer improvements (five projects)
 - ✓ Sidewalk improvements, including handicap accessibility (10 projects)
 - ✓ Parks and recreation improvements (three projects)

➤ **Economic Development**

- Assist Lehigh County businesses in the areas of establishment and/or growth.
 - ✓ Provide loans to two businesses
 - ✓ Promote façade improvements and downtown revitalization in borough and township business districts

➤ **Public Services**

- Help human service organizations provide essential services to at-risk populations.
 - ✓ Homelessness prevention services
 - ✓ Housing referral and counseling
 - ✓ Literacy and English as a Second Language education
 - ✓ Subsistence services
 - ✓ Fair Housing outreach, education and advocacy

The Planning Process:

The development of the 2012 – 2016 Strategic Plan is built upon a number of studies, plans and reports that been prepared over the past year, including:

- State of Lehigh Valley - 2011
- Lehigh Valley Economic Development Consortium (LVEDC) Sustainability Planning Grant (plan in process)
- An Affordable Housing Assessment of the Lehigh Valley
- Allentown's Plan to End Chronic Homelessness by 2017 by the First Lady's Commission to End Chronic Homelessness
- Northeast Regional Housing Advisory Board Continuum of Care application

Additionally, Lehigh County engaged a consulting firm, Mullin and Lonergan Associates, Inc. to assist in the preparation of the plan. The consultants interviewed representatives of a wide range of organizations including public service agencies, housing providers and planning bodies. Local municipalities provided input and the County held two public hearings. The County notified local municipalities of the public hearings and made an announcement in the *Morning Call* newspaper.

Evaluation of Past Performance

At the start of the last five-year period, 2007-2011, Lehigh County was a new entitlement community. Over the last four and one-half years, the County has developed the capacity to administer not only the CDBG grant, but also a number of other federal grants programs that have been made available. These programs include the Homelessness Prevention and Rapid Re-housing Program (HPRP), stimulus funds referred to as CDBG-R, HOME funds, and Neighborhood Stabilization Program (NSP) funds. At the end of the fifth year (September 30, 2012), the County will prepare a Consolidated Annual Performance and Evaluation Report (CAPER) that documents the actions taken in FY 2011 and the prior four years compared to the goals for that period. The CAPER will be available for public inspection by the middle of December 2012.

The CAPER for FY 2010 (October 1, 2010 to September 30, 2011) reported the following cumulative accomplishments by Lehigh County during the first four program years:

- Housing Rehabilitation – 40 owner-occupied homes were rehabilitated since 2007.
- Housing Development – NSP funds were used to complete one housing unit, with 10 units underway.
- Homeownership – County Affordable Housing Trust Funds were used to provide seven households with downpayment and closing cost assistance in FY 2010.
- Rental Assistance – HealthCHOICES funds were used to support 24 persons with severe mental illness.
- Homelessness Prevention and Rapid Re-housing Program - 53 households received homelessness prevention assistance and 34 households received rapid re-housing assistance.
- Housing for the Homeless – Supportive Housing Program funds were obtained through the McKinney COC program to create two new permanent supportive housing units in the NE RHAB area.
- Public Services – During FY 2010, 179 people received services from the Literacy Center, North Penn Legal Services, Lehigh Valley Center for Independent Living and Meals on Wheels. These agencies and others were funded annually since 2007.
- Community Facilities and Infrastructure – Communities received funds for projects in each year since 2007 with 17 of the projects completed through FY 2010.
- Economic Development – The Community Action Committee of the Lehigh Valley received funding support to expand the work of Rising Tide, a small business loan program.

During FY 2010 funds, as shown on HUD Form PR 23, were spent on infrastructure, public services and housing rehabilitation as described above.

• Public Services	\$ 99,206.40
• Infrastructure/Facilities	\$775,309.56
• Housing Rehabilitation	\$135,033.89
• Administration and Planning	\$227,818.66

STRATEGIC PLAN

Due every three, four or five years (length of period is at the grantee's discretion) no less than 45 days prior to the start of the grantee's program year start date. HUD does not accept plans between August 15 and November 15.

Mission:

The goal of Lehigh County is to improve the quality of life of residents by funding improvements to public facilities, infrastructure and services and to retain, stabilize, and increase the stock of affordable owner and rental housing units.

MANAGING THE PROCESS

CONSULTATION 91.200(B)

1. Identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.

The Lehigh County Department of Community and Economic Development (DCED) is the lead agency for the preparation of the Five-Year Strategic Plan and administration of the grants programs.

The DCED will work with local municipalities and other funded agencies on the implementation of programs and activities. Based on an annual application cycle, local municipal, housing, economic development, and public service projects will be funded. Through subrecipient agreements, funds will be provided to each entity administering the activities.

2. Identify agencies, groups, and organizations that participated in the process. This should reflect consultation requirements regarding the following:

General §91.100 (a)(1) - Consult with public and private agencies that provide health services, social and fair housing services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons) during the preparation of the plan.

Homeless strategy and resources to address homeless needs §91.100 (a)(2) – Consult with continuum of care, public and private agencies that address the housing, health, social services, victim services, employment, or

education needs of low-income persons, homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) and persons at risk of homelessness; publicly funded institutions and systems of care that may discharge persons into homelessness (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and business and civic leaders.

Lead lead-based paint hazards §91.100 (a)(3) – Consult with State or local health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings.

Adjacent governments §91.100 (a)(4) -- Notify adjacent governments regarding priority non-housing community development needs.

Metropolitan planning §91.100 (a)(5) -- Consult with adjacent units of general local government, including local government agencies with metropolitan-wide planning responsibilities, particularly for problems and solutions that go beyond a single jurisdiction, i.e. transportation, workforce development, economic development, etc.

HOPWA §91.100 (b) -- Largest city in EMSA consult broadly to develop metropolitan-wide strategy for addressing needs of persons with HIV/AIDS and their families.

Public housing §91.100 (c) -- Consult with the local public housing agency concerning public housing needs, planned programs, and activities

Lehigh County engaged the services of a consultant, Mullin and Lonergan Associates, Inc., to assist with the preparation of the Five-Year Strategic Plan and the 2012 Annual Action Plan. The County notified each municipality and a list of local development and public service providers of the opportunity to apply for funds, to offer comment on the five year needs of the community and to attend a public hearing to discuss the needs of the County that could be met with federal funding. The County published a public hearing notice in the local newspaper of general circulation, the *Morning Call* newspaper on February 15, 2012, a copy of which is in Appendix 2.

Housing and community development needs within the community were identified through a series of interviews, meetings with local municipalities and social service agencies, written surveys, and review of other studies, including the State of Lehigh Valley - 2011, the Lehigh Valley Comprehensive Plan...2030, An Affordable Housing Assessment of the Lehigh Valley (2007), Allentown's Plan to End Chronic Homelessness by 2017 by the First Lady's Commission to End Chronic Homelessness, and the Northeast Regional Housing Advisory Board Continuum of Care application. The housing and community development goals and objectives were presented at the initial public hearing for comment.

During a 30-day review period, the County Executive and the Board of Commissioners received the draft Five-Year Strategic Plan and Annual Action Plan. Before submission to

COUNTY OF LEHIGH

HUD and after the incorporation of any public comments received on the draft Five-Year Strategic Plan and Annual Action Plan, the County Executive will authorize adoption of the Plan.

During the development of the Five-Year Strategic Plan, the following groups were interviewed or received questionnaires to complete.

General:

Fair Housing

North Penn Legal Services

Children

Lehigh County Office of Children and Youth Services

Elderly persons

Lehigh County Office of Aging and Adult Services

Persons with disabilities

Lehigh County Mental Health and Mental Retardation (MH/MR)

Service Access Management (SAM), Inc.

Lehigh Valley Center for Independent Living - Physical disabilities

Lehigh County Conference of Churches

Persons with HIV/AIDS and their families

AIDS Activity Office of the Lehigh Valley Hospital

Homeless Persons:

Northeast Regional Housing Advisory Board

Lehigh County Conference of Churches

Catholic Charities

Valley Youth House

Community Action Committee of the Lehigh Valley

Lead-Hazard:

Commonwealth of Pennsylvania Department of Health

Adjacent Governments:

Local municipalities

Cities of Allentown and Bethlehem

Metropolitan Planning:

Lehigh Valley Planning Commission

HOPWA:

City of Allentown

Public Housing
Lehigh County Housing Authority

CITIZEN PARTICIPATION 91.200(b)

3. Based on the jurisdiction's current citizen participation plan, provide a summary of the citizen participation process used in the development of the consolidated plan. Include a description of actions taken to encourage participation of all its residents, including the following:
 - low- and moderate-income residents where housing and community development funds may be spent;
 - minorities and non-English speaking persons, as well as persons with disabilities;
 - local and regional institutions, the Continuum of Care, and other organizations (including businesses, developers, non-profit organizations, philanthropic organizations, community and faith-based organizations);
 - residents of public and assisted housing developments and recipients of tenant-based assistance;
 - residents of targeted revitalization areas.

Lehigh County has a Citizen Participation Plan that governs the outreach process.

Provision of Adequate Information

The County notified each municipality and a list of local development and public service providers of the opportunity to apply for funds, to offer comment on the five year needs of the community and to attend a public hearing to discuss the needs of the County that could be met with federal funding. This letter, which was emailed January 6, 2012, can be found in Appendix 3.

The County sent a questionnaire to everyone on the list of local development and public service providers to obtain input on housing and community needs. The deadline for completing the questionnaire was February 10, 2012. The questionnaire provided information on the meeting and public hearing dates.

The County held a public meeting on January 26, 2012 to obtain input from municipalities and others on housing and community development needs that could be addressed with Community Development Block Grant funds and other resources at the disposal of the County.

4. Provide a description of the process used to allow citizens to review and submit comments on the proposed consolidated plan, including how the plan (or a summary of the plan) was published for review; the dates, times and locations of a public hearing, or hearings; when and how notice was provided to citizens of the hearing(s); the dates of the 30-day citizen comment period; and if technical assistance was provided to groups developing proposals for funding assistance under the consolidated plan and how this assistance was provided.

Lehigh County holds two public hearings each year to obtain citizens' views on the Consolidated Plan/Annual Action Plan process and to respond to proposals and questions about this process and the Community Development Block Grant Program. These hearings were held at two different stages of the program planning process.

a. Initial Public Hearing

The first hearing was held on March 1, 2012. It was a mandatory session for all grant applicants and provided a summary of program requirements, addressed eligibility and national objectives, and outlined the Annual Action Plan process. It was also used as an opportunity to review the County's housing and community development goals and objectives and receive additional input on community needs. During the meeting, the fair housing obligation of the county, the fair housing symposium planned for April and steps local governments need to take to comply were also discussed.

Notice of the hearing appeared in the *Morning Call* newspaper on February 15, 2012, was posted on the County website and was promoted through the above mentioned emails.

b. Second Public Hearing

A second hearing was advertised in the *Morning Call* newspaper on June 28, 2012 and posted on the County website. The date of the hearing, July 10, 2012, was announced at the first public hearing as well.

The advertisement announced the availability of the Five-Year Strategic Plan and Annual Action Plan for review and comment and announced the hearing. It provided a summary of the plan, resources the County expected to have available and allocation of funds.

Copies of the advertisement were emailed to the municipalities and organizations on the County mailing list. Copies of the plan were distributed to local libraries.

c. Comments

On June 28, 2012, a summary of the Annual Action Plan was published in the *Morning Call* newspaper alerting interested persons to the availability of the plan for public review. The plan was placed on display at the Lehigh County Community Development office and at eight regional libraries. It was also posted

on the County website at:

<http://www.lehighcounty.org/Departments/CommunityEconomicDevelopment/tabid/320/Default.aspx>.

The public review period extended from June 28, 2012 to July 30, 2012. Following the public display period, the County Executive, as the chief elected official of the County, will consider authorizing the Annual Action Plan for submission to the U.S. Department of Housing and Urban Development.

5. Provide a summary of citizen comments or views received on the plan and explain any comments not accepted and reasons why these comments were not accepted.

The community review of the Five Year Consolidated Plan and Annual Action Plan for FY 2012 resulted in a robust community conversation about the role of federal, state, county and local government in the provision of funding for infrastructure and services. Individuals, local government officials, and non-profit agency representatives stated positions either opposing the use of federal funds for local needs or supporting the use of CDBG funds to address pressing local infrastructure and service needs. Ultimately 8 of the 9 County Commissioners supported the use of CDBG funds for the projects identified in the Annual Plan for FY 2012.

Among the comments received, many expressed strong feelings that the federal government should not be borrowing funds in order to create highly bureaucratic grants programs to address local needs. They believed that the County should refuse the grant and make a statement about perpetuating a federalist system. The County Commissioners voted 8,0,1 (abstention) however, to accept the grant funds and in doing so, recognized that local needs, especially those driven by federal mandates must be funded. There are insufficient resources at the local level to meet these needs.

HOUSING AND HOMELESS NEEDS

HOUSING NEEDS 91.205

If not using the CPMP Tool: Complete and submit CHAS Table from <http://socds.huduser.org/scripts/odbic.exe/chas/index.htm>

If using the CPMP Tool: Complete and submit the Needs/Housing Table

6. In this narrative, describe the estimated housing needs projected for the next five-year period for the following categories of persons: extremely low-income, low-income, moderate-income, and middle-income families; renters and owners; elderly persons; single persons; large families; public housing residents; families on the public housing and Section 8 tenant-based waiting list; persons with HIV/AIDS and their families; victims of domestic violence, dating violence, sexual assault, and stalking; and persons with disabilities,; and discuss specific housing problems, including: cost-burden, severe cost-burden, substandard housing, and overcrowding (especially large families) and substandard conditions being experienced by extremely low-income, low-income, moderate-income, and middle-income renters and owners compared to the jurisdiction as a whole. The jurisdiction must define the terms “standard condition” and “substandard condition but suitable for rehabilitation.”

Estimated Housing Needs

Current Estimates and Five-year Projections

Information from HUD’s CHAS Databook (based on the 2000 Census) has been used to prepare the following narrative. HUD 2010 CHAS data is unavailable at this time. HUD has determined that certain criteria result in housing problems for various household types. These criteria include cost-burden (paying more than 30% or more than 50% of gross household income for housing costs); occupying a substandard dwelling unit (lacking complete plumbing or kitchen facilities); or, being overcrowded (having more than one person per room). This data is the most current information available on which to base the County’s housing needs assessment.

Table 1 on the following page categorizes households in need as follows:

- Extremely low-income (0% to <30% of the median family income)
- Very low-income (30% to <50% of the median family income)
- Low-income (50% to <80% of the median family income).

Table 1 also provides a summary of the number of households in each income category by tenure and household type and the percent of such households that had a housing problem in 2000. The needs of various households, by household type within each income category, are described. The extent to which the households within each group are cost-burdened

and extremely cost-burdened, and/or living in substandard housing, is examined. Also, the extent to which such problems impact minority households is reviewed.

Table 1
Lower Income Households with Housing Problems by Income Group

Income Category by Housing Problem	RENTERS				OWNERS					
	Elderly	Small Families	Large Families	All Others	Total	Elderly	Small Families	Large Families	All Others	Total
Extremely Low Income (0- <30% of MFI)	3,024	2,415	750	2,209	8,398	2,292	749	294	613	3,948
% with Any Housing Problem	63.6	76.8	90.7	74	72.6	76.9	78.6	86.4	77.2	78
% Cost Burdened	62	73.9	81.3	73.3	70.1	76	78.1	83	77.2	77.1
% Extremely Cost Burdened	40.8	56.9	60	60.4	52.3	45.1	72.1	68	65.1	55
Very Low Income (30- <50% of MFI)	2,544	1,990	590	1,955	7,079	4,612	1,294	365	719	6,990
% with Any Housing Problem	51.8	76.1	79.7	74.7	67.3	39	74.5	79.5	71.5	51
% Cost Burdened	50.5	71.6	54.2	74.7	63.4	38.7	72.6	71.2	71.5	50
% Extremely Cost Burdened	19.5	17.3	5.9	22	18.4	11.6	39.3	21.9	43.7	20.6
Low Income (50- <80% of MFI)	1,724	2,829	650	3,085	8,288	5,655	4,395	1,344	1,740	13,134
% with Any Housing Problem	43.4	28.4	41.5	27.7	32.3	16.8	50.3	52.8	57.2	37
% Cost Burdened	42.3	21.2	14.6	25.9	26.8	16.8	50.3	43.5	57.2	36.1
% Extremely Cost Burdened	8.4	0.5	0	1.1	2.3	5.8	10.5	7.8	19.8	9.4
Middle Income (80% of MFI & above)	1,863	5,398	770	6,193	14,224	10,770	36,438	5,570	7,044	59,822
% with Any Housing Problem	14.1	5.2	24.7	3.2	6.6	7.1	8.6	12.9	16.5	9.7
% Cost Burdened	13.9	1.6	0	1.7	3.2	7.1	8.1	9	16.3	9
% Extremely Cost Burdened	4.6	0.1	0	0.1	0.7	1.1	0.7	0.4	2.6	0.9
Total	9,155	12,632	2,760	13,442	37,989	23,329	42,876	7,573	10,116	83,894

Source: HUD CHAS Table 1C

Categories of Persons Affected

The following narrative is based on the CHAS data (2000) provided by as shown on Table 1.

Renter Households

Lower income renter households consisting of households with incomes of less than 80% of the HUD median family income (MFI) accounted for 63% of all renter households in the County. In other words, close to two in every three renter households had incomes of less than \$34,760.

Elderly households, consisting of one or two persons with either person being 62 years of age or older, numbered 7,292 and were the largest group of lower income renters (31%). Small families consisting of two-four related members numbered 7,234 and were the second largest group of lower income renters (30%). Large families of five or more related members numbered 1,990 and were the smallest income group (8%). The remaining households, collectively referred to as “all other” households by HUD, numbered 7,289 and represented 31% of all lower income renter households in the County in 2000.

The following narratives describe the housing problems experienced by each of these household types.

Extremely Low-income (0-<30% of MFI)

Extremely low-income renters experienced the greatest degree of housing problems among all household types and among all income groups. Overall, 72% had housing problems, 70% experienced cost-burden (i.e., paying more than 30% of their income for housing) and 52% were extremely cost-burdened (i.e., paying more than 50% of their income for housing). It is obvious that household incomes of less than \$13,034 for a family of four in 2000 were very inadequate to achieve and maintain safe, decent and affordable housing for this income group.

Elderly households were the largest group in this income category with 3,024 households, representing 36% of all extremely low-income renter households.

Small family households were the second largest household type within this income category (29%). Their level of housing problems was higher than elderly households. Seventy-six percent of small family households experienced housing problems, with nearly the same percentage (73%) reporting cost-burden. Fifty-six percent reported being extremely cost-burdened.

The next largest household type was “all other” households which numbered 2,209 and comprised 26% of all extremely low-income renter households. Seventy-four percent reported housing problems with nearly the same percentage (73%) reporting cost-burden, and 60% reporting extreme cost-burden. “All other” households had the largest percentage of households who were extremely cost-burdened (60.4%).

Large families comprised the smallest group of households in this income category (750) and represented only 9% of all extremely low-income renter households. However, this household type experienced the highest rate of cost-burden (81%).

Very Low-income (30-<50% of MFI)

Very low-income renter households numbered 7,079 and represented 30% of all lower income renters. The income level for this group ranged from \$13,035 to \$21,724. This slight increase in income (above 30% of the MFI) for a family of four in 2000 made some difference in the degree of housing problems experienced by households in this income category. Overall, 67% of households experienced housing problems (compared to 72% among extremely low-income renters). Sixty-three percent experienced cost-burden (compared to 70% of extremely low-income renters) and only 18% were extremely cost-burdened (compared to 52% of extremely low-income renters). It is evident that increasing income decreases the rate of housing problems, most specifically the degree to which households are cost-burdened.

Elderly households numbered 2,544 and were the largest group of households in this income category (36%), but they experienced the lowest rates of housing problems. Fifty-one percent had housing problems, with almost the same percentage experiencing cost-burden. Nineteen percent were extremely cost-burdened.

Small families numbered 1,990 and represented 28% of households in this income category. Their degree of housing problems was much higher than the elderly, but slightly less than large families. Seventy-six percent had housing problems with nearly the same percentage (71%) experiencing cost-burden. Seventeen percent reported extreme cost-burden.

All other household types numbered 1,955 and comprised 27% of all very low-income renter households. Seventy-four percent had housing problems, with the same percentage (74%) experiencing cost-burden. Twenty-two percent were extremely cost-burdened.

Large families numbered only 590 and represented the smallest group within this household type (8%). However, as with extremely low-income renters, very low-income large family households experienced rates of housing problems higher than any other household type in this income category and higher than this income group overall. The rate of cost-burden was lower at 54%, and the rate of extreme cost-burden (5%) was the lowest in this group of households.

Low-income (50-<80% of MFI)

Low-income renter households numbered 8,288 and accounted for 35% of all lower income renter households in Lehigh County in 2000. Housing problems were significantly lower for this income category as household incomes rose from a range of \$21,725 to \$34,760. This increase in income resulted in better living conditions for a majority of the households. Overall, 32% reported housing problems, 26% reported cost-burden and 1% reported extreme cost-burden.

“All other household types” were the largest group with 3,085 households, representing 37% of this income category. These households also experienced the lowest rate of housing problems among all low-income renter households. Only 27% reported housing problems with nearly the same percentage (25%) being cost-burdened. Only 1% was extremely cost-burdened.

Small families were the second largest group with 2,829 households, comprising 34% of this income category. Twenty-eight percent reported housing problems, 21% reported being cost-burdened and 0.5% of households reported extreme cost-burden.

Elderly households numbered 1,724 and accounted for 21% of this income category, but they experienced the highest rate of housing problems by low-income households. Forty-three percent reported housing problems, 42% reported cost-burden and 8% reported extreme cost-burden.

Large families were once again the smallest group, numbering 650 and accounting for only 8% of all low-income renter households. Housing problems for large families in this income category were high. Forty-one percent reported housing problems, and 14% reported cost-burden. No large families were extremely cost-burdened.

Middle Income and Higher (80% of MFI and higher)

Middle income renter households numbered 14,224 and accounted for 60% of all renter households in Lehigh County in 2000. Housing problems were the lowest for this income category, as household income ranged of \$34,761 and higher. This increase in income resulted in better living conditions for the vast majority of the households. Overall, only 6% reported housing problems, while 3% reported being cost-burdened.

All other household types were the largest group with 6,193 households, representing 43% of this income category. Only 3% reported housing problems, and only 2% reported cost-burden. Only 0.1% was extremely cost-burdened.

Small families were the second largest group with 5,398 households, comprising 38% of this income category. Only 5% reported housing problems, with 2% reporting a cost-burden.

Elderly households numbered 1,863 and accounted for 13% of this income category. Fourteen percent experienced housing problems, and 14% were cost-burdened.

Large families were the smallest group, numbering only 770 and representing 5% of households in this income category. Housing problems for large families in this income category, however, were still significantly higher, with 24% reporting housing problems. No large families were cost-burdened.

Owner Households

Lower income owner households consisting of households with incomes of less than 80% of the MFI accounted for 29% of all owner households in the County. This meant that nearly one in every three owner households had incomes of less than \$34,760 in 2000.

Elderly households numbered 12,559 and comprised the majority of lower income owners (52%). Small families numbered 6,438 and were the second largest group of lower income owners (27%). Large families numbered 2,003 and were the smallest group of low-income owners (8%). The remaining “all other” households numbered 3,072 and represented 13% of all lower income owner households.

The following narratives describe the housing problems experienced by each of these household types.

Extremely Low-income (0-<30% of MFI)

Extremely low-income owners numbered 3,948 and accounted for 16% of all lower income owner households. Overall, this group experienced higher rates of housing problems than renter households in the same income group. Seventy-eight percent had housing problems, and almost the same percentage (77%) experienced cost-burden. Fifty-five percent experienced extreme cost-burden.

Elderly households comprised the majority (58%) in this income category. Seventy-six percent had housing problems, and the same percentage reported cost-burden. Forty-five percent reported extreme cost-burden.

Small families numbered 749, were the second-largest group (19%), and had the second highest rate of housing problems among all extremely low-income homeowners. Seventy-eight percent had housing problems, with the same percentage reporting cost-burden. Seventy-two percent reported extreme cost-burden.

“All other” household types numbered 613 and represented 15% of this income category. Seventy-seven percent reported housing problems, and the same percentage reported cost-burden. Sixty-five percent reported extreme cost-burden.

Large families numbered only 294, comprising 7% of extremely low-income owner households, but once again had the highest rate of housing problems among this income group. Eighty-six percent reported housing problems, with 83% reporting cost-burden. Sixty-eight percent reported extreme cost-burden.

Very Low-income (30-<50% of MFI)

Very low-income homeowners had incomes in the range of \$13,035 to \$21,724 and numbered 6,990. This represented 29% of all lower income homeowners. Overall, this income group experienced housing problems to a lesser degree than extremely low-income owners, but were still impacted more than low-income owner households. Over half reported housing problems (51%) and 30% reported cost-burden. Twenty percent reported extreme cost-burden.

Elderly households (4,612) comprised the majority (66%) of this household type. They also had the lowest rate of housing problems: 39% reported housing problems, with almost the same percentage reporting cost-burden, and 11% reported extreme cost-burden.

Small families numbered 1,294 and comprised 18% of all very low-income homeowners. Housing problems were high among this group: 74% reported housing problems, and 72% reported cost-burden. Thirty-nine percent reported extreme cost-burden.

“All other” household types numbered 719 and comprised 10% of this income category. Seventy-one percent (71%) reported housing problems, and the same percentage reported cost-burden. Forty-three percent reported extreme cost-burden.

Large families were the smallest category (5%), and the 365 households reported rates of housing problems nearly identical to small families and “all other” households in the same income category. Seventy-nine percent had housing problems, 71% reported cost-burden and 21% were extremely cost-burdened.

Low-income (50-<80% of MFI)

Low-income homeowners were the majority (54%) of all lower income owner households in Lehigh County in 2000. The 13,134 households had incomes ranging from \$21,725 to \$34,760. Overall, this group had the lowest rate of housing problems: 37% reported housing problems, and 36% reported cost-burden. Only 9% reported extreme cost-burden.

Elderly households numbered 5,655 and comprised the majority (43%) of low-income homeowners. They also had the lowest rate of housing problems in this income category: 16% reported housing problems, and the same percentage reported cost-burden, while 5% reported extreme cost-burden.

Small families numbered 4,395 and represented 33% of this income category. Fifty percent reported housing problems, and the same percentage reported cost-burden. Only 10% reported extreme cost-burden.

“All other” household types numbered 1,740 and represented 13% of this income group. Fifty-seven percent reported housing problems, and the same percentage reported cost-burden. However, 19% reported extreme cost-burden.

Large families were the smallest group at 1,344 and represented 10% of this income category. Fifty-two percent reported housing problems, 43% reported cost-burden and 7% reported extreme cost-burden.

Middle Income (80% of MFI and higher)

Middle income homeowners numbered 59,822 households in 2000 and comprised the majority (71%) of all owner households in Lehigh County. These households had incomes in excess of \$34,760. Overall, this group of homeowners had the lowest rate of housing problems: only 9% reported housing problems, 9% reported cost-burden and only 1% reported extreme cost-burden.

Small family households numbered 36,438 and comprised the majority (61%) of this household type. They experienced a lower rate of housing problems: 8% reported housing

problems, and the same percentage reported cost-burden, while less than 1% reported extreme cost-burden.

Elderly households numbered 10,770 and represented 18% of this income category. Only 7% reported housing problems, and the same percentage reported cost-burden. Only 1% reported extreme cost-burden.

All other household types numbered 7,044 and represented 12% of this income category. They also experienced the highest rates of housing problems among all homeowners in this income category: 16% reported housing problems, 16% reported cost-burden, and 3% reported extreme cost-burden.

Large family households numbered 5,570 and represented 9% of this income group. Their rates of housing problems were higher than small families and elderly households in the same income category: 12% reported housing problems, 9% reported cost-burden, and less than 1% reported extreme cost-burden.

7. To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must provide an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.

To determine the extent to which any racial group has a greater housing need in comparison to overall County need, data detailing information for Black non-Hispanic, White non-Hispanic, and Hispanic households is presented in Tables 2 and 3 on the following page.

A racial group is defined as having a disproportionate need when the percentage of housing need for that group is at least 10 percentage points higher than the percentage of housing need for Lehigh County as a whole.

In the following two tables, Black non-Hispanic renters are compared with White non-Hispanic and Hispanic renters, and Black non-Hispanic owners are compared with White non-Hispanic and Hispanic owners. To simplify the text, Black non-Hispanic households are referred to simply as Black households, and White non-Hispanic households are referred to as White households. Hispanic households are referred to as Hispanic.

The table on the following page shows the racial groups with disproportionate need. Those with disproportionate need are shaded.

Table 2
Lower Income Renter Households with Housing Problems

Income Category by Housing Problem	BLACK RENTERS				WHITE RENTERS				HISPANIC RENTERS			
	Elderly	All Families	All Others	Total	Elderly	All Families	All Others	Total	Elderly	All Families	All Others	Total
Extremely Low Income	55	260	165	480	2,605	1,205	1,460	5,270	305	1,520	450	2,275
% with Any Housing Problem	72.7	78.8	66.7	74	63.9	78.8	76.4	70.8	59	81.6	72.2	76.7
Very Low Income	34	220	140	394	2,420	1,360	1,495	5,275	65	895	275	1,235
% with Any Housing Problem	88.2	84.1	75	81.2	50.2	80.5	73.2	64.5	84.6	69.3	81.8	72.9
Low Income	15	280	125	420	1,705	1,960	2,550	6,215	4	1,150	325	1,479
% with Any Housing Problem	0	44.6	16	34.5	44.3	28.6	29.2	33.1	0	31.3	21.5	29.1
Total	104	760	430	1,294	6,730	4,525	5,505	16,760	374	3,565	1,050	4,989

Source: HUD CHAS Table 1C

Table 3
Lower Income Owner Households with Housing Problems

Income Category by Housing Problem	BLACK OWNERS				WHITE OWNERS				HISPANIC OWNERS			
	Elderly	All Families	All Others	Total	Elderly	All Families	All Others	Total	Elderly	All Families	All Others	Total
Extremely Low Income	20	30	8	58	2,225	690	560	3,475	35	240	19	294
% with Any Housing Problem	50	100	50	75.9	77.5	79.7	79.5	78.3	57.1	83.3	78.9	79.9
Very Low Income	14	49	4	67	4,540	1,305	665	6,510	24	265	35	324
% with Any Housing Problem	71.4	91.8	0	82.1	38.8	73.6	70.7	49	83.3	81.1	100	83.3
Low Income	8	145	10	163	5,570	4,710	1,655	11,935	25	660	60	745
% with Any Housing Problem	50	44.8	100	48.5	16.8	50.8	56.5	35.7	0	50.8	50	49
Total	42	224	22	288	12,335	6,705	2,880	21,920	84	1,165	114	1,363

Source: HUD CHAS Table 1C

Renter Households

Lower income (0 – 8% of MFI) renter households numbered 23,765 in 2000 and accounted for 62% of all renter households (37,989). White households represented 70% of this group, Black households accounted for 5 %, and Hispanic households accounted for 21%. The remaining 4% is made up of Native American, Pacific Islander, and Asian households.

- 1) Extremely Low-income (0-<30% of MFI)
By household type, the largest impact was experience by family households with 18.6% of Hispanic family households experiencing housing problems and 78.8% of Blacks and Whites experiencing housing problems. Elderly Hispanic households were the least impacted, with fewer experiencing problems (59%) than elderly Black households (72.7%).
- 2) Very Low-income (30-<50% of MFI).
Very low-income elderly Black households experienced housing problems at a rate of 88.2%, compared to 84.6% for very low-income elderly Hispanic households.
- 3) Low-income (50-<80% of MFI) – Low-income Black family households experienced housing problems at a rate of 44.6%, compared to 31% for low-income Hispanic family households.

There were only 420 low-income Black renter households, compared to 6,215 white renter households. Among Black and Hispanic households, there were no housing problems reported by elderly households. Black family households were the most impacted at 44.6%, followed by elderly White households at 44.3%.

Owner Households

Lower income (0 – 8% if MFI) owner households numbered 24,072 in 2000 and accounted for 29% of all owner households (83,894). White households represented 91% of this group, Black households accounted for 1%, and Hispanic households accounted for 6%. The remaining 2% is made up of Native American, Pacific Islander, and Asian households.

- 1) Extremely Low-income (0-<30% of MFI)
Seventy-nine percent of all extremely low-income Hispanic homeowners experienced housing problems, compared to 78.3% among Whites and 75.9% for Blacks. Like renters, family households were the most impacted at 100% among Blacks, 83.3% among Hispanics, and 79.7% among Whites.
- 2) Very Low-income (30-<50% of MFI)
Black family households experienced the highest level of housing problems at 91.8%, compared to 81.1% for Hispanic households and 73.6% for White households. Hispanic “all other” households experienced the highest level of housing problems of any of the categories 100%.
- 3) Low-income (50-<80% of MFI)
Low-income Hispanic homeowners had a higher overall rate of housing problems (49%), compared to 48.5% of Black homeowners (though relatively few at 103) and 35.7% for White households.

Overall Summary of Disproportionate Housing Need

Based on the CHAS data and other analysis included in the Five-Year Strategic Plan, the following conclusions relative to housing needs in Lehigh County for all household types, income groups and racial groups can be made:

- Extremely low-income households are the most vulnerable for becoming homeless, regardless of household type. In 2000, there were 8,398 renter households and 3,948 owner households in this income category. These 12,346 households represented 10% of all households in Lehigh County with incomes of less than \$13,034 for a family of four (in 2000).
- The most frequent housing problem experienced by all households with housing problems was cost-burden. This was indicated by similar rates of “any housing problems” and cost-burden in several income groups for most household types.
- Very low-income elderly Black renters reported a rate of housing problems at 88%, which is 37 percentage points higher than the rate of housing problems experienced by all elderly renter households in the same category (51%).
- Very low-income elderly Hispanic renters reported a rate of housing problems at 84%, which is 33 percentage points higher than the rate of housing problems experienced by all elderly renter households in the same category (51%).
- Low-income Black family renters reported a rate of housing problems at 44%, which is higher than the rate of housing problems experienced by all elderly renter households in the same category (43%).

Among homeowners, more Black household types were disproportionately impacted. The very low-income and low-income categories of Black elderly homeowners experienced a disproportionately higher rate of housing need than elderly households as a whole. The rate of housing problems among very low-income Black elderly owners was 71% compared to 39% for all elderly homeowners in the County. For low-income, Black owners reported a rate of 50% compared to 16% countywide.

Black family homeowners were also disproportionately affected by housing problems. All of the 30 extremely low-income Black homeowners experienced housing problems, compared to 81% countywide, and 91% of very low-income Black homeowners reported housing problems, compared to 51% countywide.

All 10 Black “all other” types of low-income homeowner households reported housing problems.

- Very low-income Hispanic elderly homeowners were disproportionately affected by housing problems. Eighty-three percent experienced housing problems, compared to 39% countywide.
- One hundred percent of very low-income Hispanic “all other” types of households reported housing problems, compared to 71% countywide.
- Homeless housing needs were reported by many of the affordable housing and supportive service agencies. The most often cited housing need was a resolution to the ineligibility of persons with criminal records to apply for public housing. Without the possibility of living in public housing, these individuals have no place

- to turn to for housing but the streets and homeless shelters.
- Several agencies cited the need for more emergency shelter beds for men and families with male children.
 - Advocates for the disabled reported a need for decent and affordable rental units in a secure environment for their vulnerable clients. They also cited the desperate need for these units to be located in desirable neighborhoods along public transportation routes so their clients could depend on daily transportation to work.

HOMELESS NEEDS 91.205 (c)

**Refer to the Homeless Needs Table 1A or the CPMP Tool's Needs.xls workbook*

8. Homeless Needs— The jurisdiction must provide a concise summary of the nature and extent of sheltered and unsheltered homelessness, (including rural homelessness and chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth), the number of persons experiencing homelessness on a given night, the number of persons who experience homelessness each year, the number of persons who exit homelessness each year; the number of days that persons experience homelessness, and other measures specified by HUD, in accordance with Table 1A. The summary must include the characteristics and needs of low-income individuals and children, (especially extremely low-income) who are currently housed but threatened with homelessness. This information may be evidenced by the characteristics and needs of individuals and families with children who are currently entering the homeless assistance system or appearing for the first time on the streets. The description must specify particular housing characteristics that have been linked with instability and an increased risk of homelessness.

Lehigh County is part of the larger Northeast Regional Housing Advisory Board (NE RHAB) for purposes of planning within the regional Continuum of Care (CoC). The regional CoC was established by the state for the purposes of applying for funding through the U.S. Department of Housing and Urban Development. Agencies seeking funding through the Stewart B. McKinney programs (Supportive Housing Program, Shelter Plus Care, etc.) must be part of a cooperative effort within their communities. There are 12 counties and the three entitlement communities (Allentown, Bethlehem, and Easton) in the CoC.

For the purposes of local planning, homelessness is best understood throughout the Lehigh Valley which spans Lehigh and Northampton Counties as well as the cities of Allentown, Bethlehem and Easton.

Each year, a Point-in-Time count is made of the persons residing in shelter and transitional facilities and living unsheltered in the NE RHAB. In addition, the Community Action Committee of the Lehigh Valley (CACLV) conducts a shelter census to determine the bed utilization rate in nine homeless shelters in the Lehigh Valley.

COUNTY OF LEHIGH

The 2012 NE RHAB Continuum of Care point in time survey depicted the number of homeless persons in the NE Region. Since an unsheltered count was not conducted in 2012, the unsheltered population figures are from the 2011 count.

Table 4
Table 1A - Homeless Population

Part 1: Homeless Population	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Number of Families with Children (Family Households):	52	116	0	168
Number of Persons in Families with Children:	173	326	0	499
Number of Single Individuals and Persons in Households without Children:	112	95	0	207
Number of Persons in Households with only Children:	6	2	0	8
Total Persons (with and without dependent children)	291	423	33	747
Part 2: Homeless Subpopulations	Sheltered		Unsheltered	Total
Chronically Homeless	34		16	50
Severely Mentally Ill	59		11	70
Chronic Substance Abuse	77		14	91
Veterans	26		6	32
Persons w/ HIV and AIDS	1		0	1
Victims of Domestic Violence	83		1	84
Unaccompanied Youth (Under 18 years of age)	8		0	8

Source: Continuum of Care HDX, NE RHAB, 2012

Based on the inventory of facilities available and the number of homeless persons, the NE RHAB determined that there is a need for 90 permanent housing beds for individuals. There is also a need for 57 permanent housing beds for families.

The Community Action Committee of the Lehigh Valley (CACLV) Census provides a more detailed demographic picture of homelessness. Annually, the CACLV undertakes a census of the homeless who are in shelters in the Lehigh Valley and a street count of those who are not living in shelters.

Nine shelters participated in the 2010 survey:

- Allentown Rescue Mission, Allentown, Lehigh County
- New Bethany Ministries, Bethlehem, Northampton County
- Safe Harbor Easton, Easton, Northampton County
- Sixth Street Shelter, Allentown, Lehigh and Northampton County
- The Beall and Linny Fowler Hospitality House, Allentown, Lehigh County
- Third Street Alliance for Women & Children, Easton, Northampton County
- Turning Point of the Lehigh Valley, Lehigh and Northampton County
- Valley Youth House, Bethlehem, Lehigh County
- Victory House of Lehigh Valley, Bethlehem, Northampton County

The following are some of the most significant facts from the 2010 report:

- **Homeless Population:** 2,441 men, women, and children were housed in the Lehigh Valley's nine emergency and short-term transitional shelters in 2010.
 - **Children:** 780 (32%) of the residents in the shelters were children.
 - **Families:** The total number of men, women, and children housed in family shelters during 2010 was 1,162, which accounts for 47.7% of the total sheltered population. Children accounted for 67.1% (780) of the population using family shelters.

Female heads of household comprised most of the adults using family shelters. Females (337) comprised 88.2% of adults in family shelters and 29.0% of the total family shelter population. Males (45) accounted for 11.8% of adults in family shelters and 3.9% of the total family shelter population.

- **Average Number of Days Spent in Shelter:** Children spent an average of 45.9 nights in a shelter; adults spent an average of 32.1 nights. The number of adult nights represents an increase of 13.6% since the 2008 shelter study.
- **Size of Family:** 69% of families had two or fewer children. This figure is comparable to previous years.
- **Age of Mother at First Child's Birth:** 38.8% of the mothers had their first child before the age of 19 and 9.2% had their first child before the age of 16 years. Motherhood at a young age is a significant factor in the lives of mothers who find themselves homeless and seeking shelter.
- **Racial/Ethnic Background:** 48.8% of sheltered residents were Caucasian, 26.1% were African American, 22.8% were Hispanic, 1.3% were Multi-Racial, 0.6% were Asian American, 0.3% were Native American, and 0.1% were Other. These figures are comparable to previous years. However, those who are Hispanic/Latino made up the largest share of the family shelter population (38.9%), and Whites made up the largest share of the individual shelter population.
- **Education:** 69% of adults had attained at least a high school diploma, GED, or post-secondary schooling.
- **Employment:** 17.3% of adults were employed and 23% of families were headed by an employed adult. Domestic violence was the primary reason for unemployment for heads-of-households. Mental health, followed by other disabilities, was the primary reasons for unemployment for individuals.
- **Income:** 48.7%% of shelter residents had no income, and 76.8% had incomes below 75% of the poverty level, and 97.7% lived below 125% of the poverty level.
- **Places of Former Residence:** Before coming to the shelter, 61% of shelter residents indicated that they formerly lived in one of the suburban municipalities of the Lehigh Valley.

- **Reason for Leaving Former Residence:** The primary reason for leaving place-of-former-residence was non-payment of rent. In the night before entering shelter, most had tried living with someone else or “doubling up”.

Persons and Families at Imminent Risk of Losing Their Housing

The number of households at risk of becoming homeless is a more difficult item to quantify. The HEARTH Act of 2009, defines persons at risk of homelessness as follows:

At risk of homelessness

(1) An individual or family who:

- (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
- (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “homeless” definition in this section; and

(iii) Meets one of the following conditions:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, state, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons, or lives in a larger housing unit in which there reside more than 1.5 persons per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved consolidated plan;

- (2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act, section 637(11) of the Head Start Act, section 41403(6) of the Violence Against Women Act of 1994 , section 330(h)(5)(A) of the Public Health Service Act, section 3(m) of the Food and Nutrition Act of 2008 , or section 17(b)(15) of the Child Nutrition Act of 1966.
- (3) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) of that child or youth if living with her or him.

While not all Lehigh County residents with incomes below 30% of median are threatened with housing instability, it is nearly impossible to maintain adequate housing at such an income. The National Low-income Housing Coalition, in the 2011 Report “Out of Reach”, stated that a household would have to earn 113% of median income or earn \$17.48 per hour, to afford a 2 bedroom apartment in the Lehigh Valley. This rate is 241% of minimum wage. The income needed to rent a two-bedroom unit (using no more than 30% of income for housing costs) for the average rate of \$803 per month is \$36,360. The rental rates affordable to persons with incomes of 30%, 50% and 80% of family average median income respectively, and the minimum wage are shown below:

Rent affordable at 30% of AMI	Rent affordable at 50% of AMI	Rent affordable at 80% of AMI	Rent affordable at median income	Rent affordable with full-time job paying min wage
Family Annual Median Income 30%	Family Annual Median Income 50%	Family Annual Median Income 80%	Family Annual Median Income 100%	MINIMUM WAGE FOR AFFORDABILITY
\$509	\$849	\$1,358	\$1,698	\$377

Source: *Out of Reach, 2011, National Low-income Housing Coalition*

It is difficult to accurately measure the number of persons “at-risk” of becoming homeless. It is impossible to gauge at any time the number of people who are threatened with eviction, unemployment, foreclosure, or termination of utilities. Families and individuals are at-risk of becoming homeless when they no longer have any cushion against the perils of life. Most commonly, a family is at risk when it lives paycheck-to-paycheck without any savings for sudden emergencies. An example of an individual at risk would be a person with a mental illness facing the threat of eviction because of improper behavior. If only one lost paycheck, a small rent increase, one stint of illness, a temporary layoff from work, or one “episode” can cause people to lose their housing, then they are considered “at-risk.” Furthermore, those who are vulnerable to residing in shelters or on the street and are at risk of becoming homeless include:

- Persons leaving institutions (detox, mental hospitals, prisons, etc.)
- Households with incomes less than 30% of the median family income
- Households paying in excess of 50% of income for housing costs

- Victims of domestic violence
- Special need populations (i.e. persons with AIDS, disabilities, drug and/or alcohol addiction, etc.)
- Single parent head of households who are unemployed
- Large low-income families
- Renters facing eviction
- Homeowners facing foreclosure
- Young adults aging out of foster care

Households that exhibit one or more of the characteristics listed constitute a population that is “at-risk” of becoming homeless. These individuals and families are considered at-risk of becoming homeless because they have a lesser chance of being able to make economic improvements in their lives. Currently, the number of persons in each of the groups identified above is unknown. It is recognized that these populations exist in Lehigh County given the current recession.

9. Describe, to the extent information is available, the nature and extent of homelessness by racial and ethnic group. A quantitative analysis is not required. If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates.

As shown on page 27, The Community Action Committee of the Lehigh Valley (CACLV) shelter census in 2010 identified the homeless population by race. In 2010, 48.8% of sheltered residents were Caucasian, 26.1% were African American, 22.8% were Hispanic, 1.3% were Multi-Racial, 0.6% were Asian American, 0.3% were Native American, and 0.1% were Other. These figures are comparable to previous years. However, those who are Hispanic/Latino made up the largest share of the family shelter population (38.9%), and Whites made up the largest share of the individual shelter population.

NON-HOMELESS SPECIAL NEEDS 91.205 (d) INCLUDING HOPWA

**Please also refer to the Non-homeless Special Needs Tables 1A & 1B or, in the CPMP Tool, the Needs.xls workbook.*

10. Estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, victims of domestic violence, public housing residents, and any other categories the jurisdiction may specify and describe their supportive housing needs. The jurisdiction can use the Non-Homeless Special Needs Table (Table 1B or Needs.xls in CPMP Tool) of their Consolidated Plan to help identify these needs.

**Note: HOPWA recipients must identify the size and characteristics of the population with HIV/AIDS and their families that will be served in the metropolitan area.*

Persons with special needs include the frail elderly, persons with disabilities, persons with mental illness, persons with intellectual disabilities, persons with substance abuse problems, and persons with HIV/AIDS. The portion of these populations requiring special housing options has not been quantified. Many persons with such special needs also have very low-incomes. Therefore, their needs may have already been taken into account in estimating the needs of persons with very low-incomes. However, for some people, supportive housing – housing with supportive services – is needed as they are unable to undertake the Activities of Daily Living (ADL) without assistance. When family support is not available and in-home care is not sufficient, different housing options are needed.

Populations with Special Needs Other than Homeless

In this section, reference to county data includes Allentown and Bethlehem. Statistical information is only available at the county-wide level unless otherwise noted.

Supportive housing is defined as residential units that provide a planned services component with access to a range of services identified as necessary for the residents to achieve personal goals. Various populations with special needs require supportive housing. The needs of these subpopulations are described in the sections below. Because it is not always possible to determine the number of persons who have supportive housing needs, the Five-Year Strategic Plan uses standards recommended by national agencies to determine the estimated number of persons with supportive housing needs in Lehigh County.

Elderly and Frail Elderly

A frail elderly person is defined as one who has one or more limitations of activities of daily living (ADL), and one who may need assistance to perform ADL. Elderly persons may need housing assistance for two reasons – financial and supportive. Supportive housing is needed

when an elderly person is both frail and low-income, since the housing assistance offers services to compensate for the frailty in addition to financial assistance.

An estimate of the number of frail elderly in Lehigh County requiring supportive services can be obtained by applying the national prevalence statistics for the proportion of elderly that require assistance with ADL to the number of elderly in Lehigh County who are low-income.

According to the Four Year Plan (2008-2012) of the Lehigh Valley Office of Aging and Adult Services, the population of seniors age 65 and older is expected to increase from 15.8% of the population in 2000 to 21.7% of the population by 2030. This change in the population will result in greater demands to adapt the current housing stock to meet the needs of seniors and to additional demands on area social services.

The Office of Aging and Adult Services Four Year Plan also provides information on needed services based on a stakeholder survey. The following are highlights of this survey:

- There are a growing number of minority persons needing services, as well as an increase in the 80+ population requiring services to remain at home within their community.
- There is a need to address the wait list for services. The growing number of adults requiring services as people live longer and need services for a longer period of time has resulted in longer waiting lists for such services.
- There is a need for additional funding to eliminate the wait list for services, meet the growing demand for programs and services, and to maintain current programs and services.
- There is a need to reach out to the aging members of rural communities. Information about available programs and services to help them remain in their own home and community and coordinate with transportation services is needed to help meet needs that are not accessible in rural communities, such as medical appointments, food shopping, or access to neighborhood senior centers.

The 2010 Census reported that there were 48,559 persons age 65 and over in the County representing 14% of the total population. Among these individuals, the Census reported the following statistics:

- 17,556 (36%) reported that they had a disability.
- 3,575 (20%) of the 17,556 elderly with a disability reported that they had a self-care disability that limited their ability to dress, bath, or get around inside their home without assistance.
- 7,608 (43%) of the 17,556 elderly with a disability reported that their disability limited their ability to live independently.
- 3,508 (7.2%) of all elderly persons were living below the poverty level; 1,663 (9.4%) of the 17,556 elderly persons with a disability had income levels below poverty.

The 2000 CHAS data provides information on elderly households in the County with mobility and self-care limitations. As defined by the 2000 CHAS data, mobility and self-care limitations are a long-lasting condition that substantially limits one or more basic physical

activities, such as walking, climbing stairs, reaching, lifting, or carrying; and/or a physical, mental or emotional condition lasting more than six months that creates difficulty with dressing, bathing, or getting around inside the home. The 2000 CHAS data provides the information by income category and reports on those with a housing problem. The data distinguishes by age, identifying elderly and extra elderly households. Elderly households are one- or two-member households where either person is 62 to 74 years. Extra elderly are one- or two-member households where either person is 75 years or older.

The 2000 CHAS data reports the following information about elderly households with mobility and self care limitations in Lehigh County:

- Of the 2,890 elderly and extra-elderly renter households with incomes below 80% of Median Family Income (MFI), 54% experienced housing problems in 2000.
- Of the 3,359 elderly and extra-elderly owner households with incomes below 80% of the MFI, 39% experienced housing problems.

Table 5
Elderly Households with Mobility & Self-Care Limitations with Housing Problems

	62 to 74 Years	75 and Older	Total	With Any Housing Problem	
				Total	% of Households with a Limitation
Renter Households					
Low Income	915	1,975	2,890	1,565	54%
Above LMI	175	385	560	135	24%
Total Renters	1,090	2,360	3,450	1,700	49%
Owner Households					
Low Income	1,214	2,145	3,359	1,324	39%
Above LMI	1,190	1,189	2,379	178	7%
Total Owners	2,404	3,334	5,738	1,502	26%

Source: HUD State of the Cities Data Systems; CHAS Data 2000

The affordable and supportive service needs of the elderly include the following:

- Home maintenance assistance, including minor home repairs, is the most needed supportive housing service.
- Affordable, safe and appropriate housing is needed.
- Adaptive modifications that allow them to remain in their homes as their physical conditions change should be provided.
- For people age 75 and over, the need for medical and other types of professional care rises sharply, as evidenced by the large number of the elderly age 75 and over with self-care and go-outside the home disabilities.
- As people live longer, there will likely be more people in need of care because of dementia or other illnesses that diminish their mental capacity. The 2000 Census reported that there were 3,470 persons age 65 and over with a mental disability in Lehigh County.
- The need for personal care and assistance with daily living is increasing. As baby boomers age and families grow smaller, there will be an increasing number of older people who need support and assistance and fewer family members to fill the traditional role of providing care. Where there are no family members to provide direct care, public and nonprofit agencies will need to be increasingly creative in finding means to help the elderly remain in the community.

Persons with Disabilities

The majority of people with psychiatric or developmental disabilities experience housing problems or have housing needs in some form; such as cost-burden, overcrowding, substandard housing, inability to move out of an institutional or residential treatment setting beyond the period of need, and homelessness.

The 2000 CHAS data reported that among non-elderly households (that is, households where no member is 62 years of age or older) in Lehigh County, there were 4,000 renter households with mobility and self-care limitations. Together, these households comprised 52% of all County non-elderly households with mobility and self-care limitations and housing problems. Within this group, low-income households outnumbered above low-income households by more than three to one.

The number of non-elderly homeowner households with mobility and self-care limitations and housing problems was far greater than among renters – 6,630 to 4,000. However, low-income homeowner households with limitations were less likely to have experienced housing problems than their renter counterparts – 56% to 61%. For households above 80% of the MFI, the percentages of rental and owner households with limitations having housing problems were very similar, 16% versus 12%, respectively.

Table 6
Non-Elderly Households with Mobility & Self-Care Limitations with Housing Problems

	With Any Housing Problem	
	Total	% of Households with a Limitation
Renter Households		
Low Income	3,180	61%
Above LMI	820	16%
Total Renters	4,000	52%
Owner Households		
Low Income	2,320	56%
Above LMI	4,310	12%
Total Owners	6,630	27%

Source: HUD State of the Cities Data Systems; CHAS Data 2000

Issues related to housing for persons with disabilities include the following:

- Affordable, safe and appropriate housing
- Creative home modification programs for those who acquire a disability as they age or through accident or illness
- Accessible housing, particularly for those with severe disabilities
- Assistance with one-time rental assistance and security deposits
- Varying levels of supportive services adaptable to individual requirements
- Effective pathways to ensure consumer information on existing housing programs
- Services for those who are dually-diagnosed
- Outreach to individuals who resist or cannot access the traditional mental health service system
- Convenient transportation available at varied times

A recent report (2008-2009) from the Lehigh Valley Research Consortium (LVRC) studied how the Lehigh Valley can become more accessible and inclusive of persons with disabilities. This was updated in 2012 to report on improvements.

Persons with Alcohol and Other Addictions

Alcohol or other drug abuse is defined as an excessive and impairing use of alcohol or other drugs, including addiction. Persons who are classified with alcohol or other addictions may have a history of inpatient treatment (detox), be identified by current symptomatology or by an assessment of current intake, and by some combination of these approaches. The National Institute of Alcohol Abuse and Alcoholism estimates the number of men with drinking problems at 14% to 16%, and the number of women with similar problems at 6%. No similar statistics exist for abuse of other drugs. However, the National Institute of Alcohol Abuse and Alcoholism estimates that one-third or more of the clients in publicly funded residential group programs are homeless most of the year before entering treatment. Since

this group is without housing and medical insurance, it is assumed that they are low-income and in need of supportive housing.

There is no source of data to determine the extent of this population in Lehigh County. If the national estimated percentages of men and women with alcohol addictions are applied to the 2000 population, approximately 21,077 to 24,088 men and 9,692 women in Lehigh County may have drinking problems.

Persons Diagnosed with AIDS and Related Diseases

In Pennsylvania, AIDS and HIV infections are reportable conditions. The Pennsylvania Department of Health maintains a registry of reported cases on a County basis. According to the HIV Surveillance Summary Report (December 2010), the state reported that there were 520 persons living with AIDS in Lehigh County and 390 reported deceased (1980-2010). The annual incidence for AIDS by year of diagnosis (2007-2010) was 9.32 per 100,000 persons, a rate higher than the state rate of 5.72.

The housing needs and problems of people living with HIV and AIDS are similar to those of people of similar health or socio-economic status. Many people living with HIV and AIDS have other psychosocial, health, and emotional problems such as chemical dependency and mental health problems. Key housing problems include affordability, security, transportation, and child care issues. Financial constraints are central to most housing issues faced by people living with HIV and AIDS in the community. Financial problems often appear to be accentuated by the inability to work and expenses for medical care and medicines beyond the scope of insurance.

The housing needs of people living with HIV and AIDS are diverse. Housing programs targeting the population need to be flexible enough to address a wide range of needs and problems. Programs should focus on helping people with HIV and AIDS to stay in their own homes. Housing programs may need to find ways to address underlying causes and related problems, such as alcohol and drug services, mental health services, benefits counseling, and public transportation.

Housing programs for persons with HIV and AIDS should include the following:

- Direct financial or in-kind assistance to clients, specifically rental and mortgage assistance
- Direct services, specifically case management and in-home services
- A flexible indirect assistance component that provides a pool of funds to address multiple housing concerns such as utility assistance, home improvements and renovations

Domestic Violence

There are few housing facilities serving victims of domestic violence in Lehigh County. Turning Point is the only domestic violence agency that provides shelter exclusively for victims of domestic violence. Turning Point of the Lehigh Valley also offers limited transitional housing.

During 2010-2011, 2,293 Lehigh County significant others, adults and child victims of domestic violence sought assistance from Turning Point. Fleeing because of violence in their homes, 185 women and children spent 5,333 bed nights (one person per bed per night) in the emergency shelter. These statistics are from a time when Turning Point was operating a shelter in Northampton County as well as in Lehigh County. Due to budgetary reasons, the Northampton County shelter closed in spring 2011.

Notably, women and children are spending more bed nights at this shelter than in the past due to the difficulty service recipients have in finding affordable housing within a 30-day period. With women and children spending longer times in the shelter while waiting to find housing, fewer people can be served by the shelter.

The need for housing for victims of domestic violence is currently high and growing in the region. The challenge in operating such housing is the need for housing subsidies, often at 100%, and funding for staff and support services. An expanded voucher subsidy, tenant-based rental assistance, (TBRA) program could be used to provide much needed assistance to move women and children from the shelter to permanent housing.

Public Housing Residents

Persons living in public or assisted housing may want to leave public housing if their living situation stabilizes or if homeownership opportunities become available. Family self-sufficiency programs and homeownership programs provide such opportunities.

The groups most likely to benefit from self-sufficiency programs are the very low and low-income individuals and families in public and assisted housing. These groups, along with those in temporary homeless shelters and transitional housing, could utilize self-sufficiency skills to gain control of their lives.

In Lehigh County there exists a waiting list of persons desiring to rent a public housing unit. As of February 2012, there were 4,234 applicants on file waiting for available public housing units from the Lehigh County Housing Authority. Of these, 1,137 (26.9%) were Black households, 1,760 (41.6%) were Hispanic households, and 500 (11.8%) were households with a disabled member. The greatest unmet need of public housing residents is family rental housing for households under 50% AMI and special needs housing.

Also in February 2012, there were 509 applicants on the Section 8 waiting list. There were 67 (13.2%) Black households and 131 (25.7%) Hispanic households on the waiting list, in addition to 99 (19.4%) households on the waiting list with a disabled member. The Section 8 waiting list is closed, and the waiting period is approximately two years.

LEAD-BASED PAINT 91.205 (e)

11. Estimate the number of housing units* that contain lead-based paint hazards, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income and moderate-income families.

**If using the CPMP Tool, this number can be provided on the Housing Needs Table in the*

Estimated Number of Housing Units that Contain Lead-Based Paint

Lead poisoning is a major threat to young children. Due to their developing brains, children are particularly vulnerable. At high levels, lead poisoning can cause convulsions, coma or even death. More insidious however, are the detrimental effects of low levels of lead poisoning on children. Lead as little as one-quarter the size of a grain of salt is enough exposure to cause learning disabilities in children under age six. Hearing impairments and slowed growth are also signs of lead poisoning.

It is now known that eating paint chips is not the primary cause of lead poisoning in young children. The primary cause of lead poisoning occurs from lead dust in the air. When a surface painted with lead-based paint begins to deteriorate, lead dust is produced. Climbing a stair tread or the wind blowing through an open window will cause dust to circulate dangerously through a room.

Blood lead level testing is needed to determine if a child has been exposed to lead-based paint. Levels in excess of 10u/dl is considered harmful. Levels over 20u/dl are considered extremely harmful.

The Pennsylvania Lead Elimination Plan notes that children residing in homes built prior to 1978, whose families receive Medicaid, have a history of anemia and have less than 12 years of education are particularly at risk. According to the Pennsylvania Department of Health's 2010 Pennsylvania Childhood Lead Surveillance Program (CLSP) report, the most recent report available, 47 children under the age of seven in Lehigh County had an elevated blood lead level.

Table 7
Estimate of Children Exposed to Lead-based Paint, 2010

# of Children Tested	Screening Rate (# tested / population)	Total # of Confirmed Cases	Percent Confirmed Elevated
3,676	13.58%	47	1.28%

Source: Pennsylvania Department of Health, Dept. of Health's 2010 Childhood Lead Surveillance Program Report

In 2010, there were 148,617 Pennsylvania children under seven years of age reported to have been tested for lead. Of those children, 2,595 (1.75%) were reported to have confirmed elevated blood lead levels (EBLLs) – a higher rate than in the County. Of the

children tested for lead in Pennsylvania in 2010, there were 1,575 children under three and 2,595 children under seven with confirmed elevated blood lead levels (EBLLs).

It is generally recognized and accepted that the primary source for childhood lead poisoning remains exposure to aging, deteriorating lead-based paint dust. While lead was banned from paint in 1978, many older dwellings still contain layers of pre-1978 paint. According to the 2010 Census data, Pennsylvania ranks second in the nation for having the most housing units identified as having been built before 1980.

Most of the factors that contribute to the prevalence of lead-based paint poisoning in Lehigh County can be quantified. According to the Report on the National Lead-based Paint in Housing, there are no statistically significant differences in the prevalence of lead-based paint by type of housing, market value of the home, cost of housing, household income or geographic region. By utilizing estimated national percentages of housing with lead-based paint to the housing stock data from the 2010 Census, we can estimate the number of homes with lead-based paint in Lehigh County (including the cities of Allentown and Bethlehem).

Table 8
Estimated Units with Lead-based Paint

Year Built	Renter Units			Owner Units		
	Total Units	% with LBP	Estimated Units with LBP	Total Units	% with LBP	Estimated Units with LBP
1960-1979	13,144	x 0.62 =	8,149	19,323	x 0.62 =	11,980
1940-1959	5,602	x 0.80 =	4,482	18,051	x 0.80 =	14,441
Before 1940	13,227	x 0.90 =	11,904	19,904	x 0.90 =	17,914
Total	31,973		24,535	57,278		44,335

Source: 2010 U.S. Census Bureau; U.S. Dept. of HUD

Based on the total owner and rental units shown in Table 8, 68,870 homes potentially have lead-based paint. However, the number of homes with children under age seven is unknown. There are 21,406 children under age five in the Lehigh County entitlement area (2010 U.S. Census). As the numbers indicate, there is strong evidence of a lead-based paint threat to children.

The 2000 CHAS data contains information about units affordable to low-income households. Until 2010 CHAS data is made available, this data provides the best estimate to cross-reference age of housing units and affordability. The information only identifies total units and units constructed before 1970. The information does not provide a further break down of units by decade built.

To further refine the 2000 CHAS data, year-built information available from the 2000 Census is applied to the units identified as affordable to low-income households. Using data provided by HUD, it is possible to approximate the number of housing units that may contain lead-based paint and that are occupied by low- and moderate income (LMI) households. The significance of this data is that LMI owner households who are cost-

burdened may not have the resources to abate lead-based paint in their homes. LMI renter households may not even be aware that their leased units contain lead-based paint, or they may be hesitant to ask their landlord to abate the problem for fear of being evicted or having their rent increased.

According to Table 9 below, HUD estimated that 1,803 rental units in Lehigh County occupied by extremely low-income households were built prior to 1970. This represents 57% of the housing stock affordable to households with incomes of less than 30% of the median family income. Another 4,079 units constructed prior to 1970 were identified as affordable to households with incomes between 30-50% of the median family income, which represented 76% of the stock affordable to households with incomes between 50-80%. A total of 5,384 units were identified as constructed prior to 1970 and occupied by households with incomes between 50-80% of the MFI. Altogether, 11,267 units were occupied by LMI households in 2000 and built prior to 1970. This was equivalent to 9% of the total 2000 housing stock.

For owner-occupied units, a total of 9,975 units were identified as occupied by and affordable to LMI households and built prior to 1970. This represented 7% of the entire housing inventory.

Table 9
Number of Units by Age and Affordability

Housing Units by Affordability	Renter Units by Number of Bedrooms				Owner Units by Number of Bedrooms			
	0-1	2	3+	Total	0-1	2	3+	Total
0-<30% of MFI								
Occupied Units	2,064	530	559	3,153	N/A	N/A	N/A	N/A
Built Prior to 1970	966	392	446	1,803	N/A	N/A	N/A	N/A
30-<50% of MFI								
Occupied Units	2,897	1,425	1,041	5,363	205	1,180	3,291	4,676
Built Prior to 1970	2,129	1,070	880	4,079	157	704	2,761	3,623
50-<80% of MFI								
Occupied Units	4,188	3,158	1,816	9,162	265	1,803	6,671	8,739
Built Prior to 1970	2,483	1,690	1,211	5,384	184	1,478	4,690	6,352
Total Units Built Prior to 1970	5,579	3,151	2,536	11,267	341	2,183	7,451	9,975

Source: HUD State of the Cities Data Systems; CHAS Data 2000

HOUSING MARKET ANALYSIS

HOUSING MARKET ANALYSIS 91.210

Refer to the Housing Market Analysis Table in the Needs.xls workbook

12. Based on information available to the jurisdiction, describe the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing; the housing stock available to serve persons with disabilities; and to serve persons with HIV/AIDS and their families.

General Housing Stock Characteristics

Characteristics of Lehigh County's existing housing stock are described in this section of the Five-Year Strategic Plan.

The U.S. Department of Housing and Urban Development (HUD) defines affordable housing as housing in good condition that does not cost more than 30% of a household's annual income for mortgage/rent, utilities and taxes. For example, a household with a gross annual income of \$30,000 can spend up to \$9,000 per year (\$750 per month) on housing. Anything above that amount would be unaffordable for such a household. HUD uses the median family income (MFI) for an area to determine what is affordable for the majority of households. While identifying how much a household can afford is a relatively straightforward calculation, it is a lot more difficult to identify how much of the available County housing stock is in good condition and affordable to various income levels. In addition, it is necessary to determine how much of the existing housing stock is affordable and available for rent versus ownership.

Housing Inventory

The 2010 Census reported that there were a total of 142,613 housing units in Lehigh County (including Allentown and Bethlehem). This represented a net increase of 20.5% since 1990.

Table 10
Increase in Housing Units in Lehigh County, 1990-2010

Increase in Housing Units, 1990-2010				
	Lehigh County		Pennsylvania	
	Units	% Change	Units	% Change
1990	118,335	-	4,938,140	-
2000	128,910	8.9%	5,249,750	6.3%
2010	142,613	10.6%	5,567,315	6.0%

Source: 2010 U.S. Census Bureau

COUNTY OF LEHIGH

All County municipalities except Coopersburg Borough, Emmaus Borough and Hanover Township gained housing units between 2000 and 2010. The rate of increase varied by municipality, from 1.1% in Coplay Borough to 61% in Lower Macungie Township. The following table provides the change in housing units by municipality from 2000 to 2010.

Table 11
Change in Housing Units by Municipality, 2000-2010

	2000	2010	Change	% Change
Lehigh County	128,910	142,613	13,703	10.6%
Alburtis Boro.	806	910	104	12.9%
Allentown City	45,960	46,921	961	2.1%
Bethlehem City (part)	8,542	8,927	385	4.5%
Catasauqua Boro.	2,747	2,792	45	1.6%
Coopersburg Boro.	1,050	985	-65	-6.2%
Coplay Boro.	1,484	1,501	17	1.1%
Emmaus Boro.	5,198	5,192	-6	-0.1%
Fountain Hill Boro.	2,029	1,998	-31	-1.5%
Hanover Twp.	937	751	-186	-19.9%
Heidelberg Twp.	1,244	1,327	83	6.7%
Lower Macungie Twp.	7,398	11,910	4,512	61.0%
Lower Milford Twp.	1,308	1,417	109	8.3%
Lowhill Twp.	703	836	133	18.9%
Lynn Twp.	1,443	1,692	249	17.3%
Macungie Boro.	1,418	1,493	75	5.3%
North Whitehall Twp.	5,473	6,000	527	9.6%
Salisbury Twp.	5,281	5,595	314	5.9%
Slatington Boro.	1,867	1,931	64	3.4%
South Whitehall Twp.	7,154	8,180	1,026	14.3%
Upper Macungie Twp.	5,335	7,843	2,508	47.0%
Upper Milford Twp.	2,564	2,931	367	14.3%
Upper Saucon Twp.	4,117	5,262	1,145	27.8%
Washington Twp.	2,594	2,755	161	6.2%
Weisenberg Twp.	1,514	1,841	327	21.6%
Whitehall Twp.	10,744	11,623	879	8.2%

Source: 2010 U.S. Census Bureau

Types of Housing Units

The 2010 Census reported that single-family homes (both detached and attached units) remained the dominant housing choice in Lehigh County. The housing stock is 74% single family, 23.5% multi-family and 2.4% mobile homes.

Table 12
Units per Structure, 2010

	Total Units	Single-family units	Multi-family units				Total	Mobile home, Boat, RV, etc.
			2 to 4	5 to 9	10 to 19	20 or more		
Lehigh County	140,965	74.0%	9.8%	4.1%	4.6%	5.0%	23.5%	2.4%
Pennsylvania	5,537,308	75.1%	9.1%	3.4%	2.6%	5.5%	20.5%	0.0%

Source: 2010 Five-Year American Community Survey (B25024)

Occupancy and Tenure of Housing Units

Lehigh County's home ownership rate remained the same between 2000 and 2010 at 68.8%. The 2010 Census reported that 91,431 of the County's 132,879 occupied housing units were owner-occupied, while 41,448 were renter-occupied. Table 13 provides a more detailed breakdown of the County's occupancy and tenure characteristics in 2000 and 2010.

Table 13
Occupancy and Tenure Characteristics, 2000-2010

	Housing Units		Owner Occupied		Renter Occupied		Vacant	
	Total	Occupied	Total	% of Occupied	Total	% of Occupied	Total	% of Total
Lehigh County								
2000	128,910	121,906	83,849	68.8%	38,057	31.2%	7,004	5.4%
2010	140,965	132,879	91,431	68.8%	41,448	31.2%	8,086	5.7%

Source: U.S. Census, 2000, (QT-H1), 2010 Five-Year American Community Survey (B25002, B25003)

Median Housing Value and Median Gross Rent

The median housing value of a single family home in Lehigh County as reported in the 2010 Census was \$203,200. As shown on Table 14 on the following page, median housing values ranged widely in Lehigh County, from a low of \$123,300 in Hanover Township to \$336,100 in Weisenberg Township.

Table 14
Median Housing Value by Municipality in
Lehigh County, 2010

	Median Value
Lehigh County	\$203,200
Alburtis Boro.	\$191,600
Allentown City	\$143,500
Bethlehem City (part)	\$175,700
Catasauqua Boro.	\$138,900
Coopersburg Boro.	\$227,000
Coplay Boro.	\$170,400
Emmaus Boro.	\$186,400
Fountain Hill Boro.	\$149,000
Hanover Twp.	\$123,300
Heidelberg Twp.	\$215,600
Lower Macungie Twp.	\$280,000
Lower Milford Twp.	\$294,000
Lowhill Twp.	\$297,400
Lynn Twp.	\$244,200
Macungie Boro.	\$191,100
North Whitehall Twp.	\$261,700
Salisbury Twp.	\$222,300
Slatington Boro.	\$141,700
South Whitehall Twp.	\$234,400
Upper Macungie Twp.	\$292,600
Upper Milford Twp.	\$287,300
Upper Saucon Twp.	\$299,800
Washington Twp.	\$209,600
Weisenberg Twp.	\$336,100
Whitehall Twp.	\$195,300
Pennsylvania	\$159,300

Source: 2010 Five-Year American Community Survey (B25077)

The Census Bureau also collected data on the monthly gross rents for rental units, which was defined as the amount of the contract rent plus the estimated average monthly cost of utilities (electricity, gas, and water and sewer) and fuels (oil, coal, kerosene, wood, etc.) if these are paid for by the renter (or paid for the renter by someone else). As shown on Table 15, the median gross rent in Lehigh County in 2010 was \$822, ranging widely from \$618 in Fountain Hill Borough to \$1,180 in Lower Milford Township.

Table 15
Change in Median Gross Rent by Municipality 2000-2010

	2000		2010	% Change
	Actual	Adjusted	Actual	
Lehigh County	\$586	\$744	\$822	10.5%
Alburtis Boro.	\$579	\$735	\$1,067	45.1%
Allentown City	\$541	\$687	\$786	14.4%
Bethlehem City (part)	\$608	\$772	\$856	10.9%
Catasauqua Boro.	\$543	\$690	\$792	14.8%
Coopersburg Boro.	\$538	\$683	\$650	-4.9%
Coplay Boro.	\$543	\$690	\$755	9.5%
Emmaus Boro.	\$628	\$798	\$895	12.2%
Fountain Hill Boro.	\$457	\$580	\$618	6.5%
Hanover Twp.	\$739	\$939	\$1,019	8.6%
Heidelberg Twp.	\$596	\$757	\$947	25.1%
Lower Macungie Twp.	\$795	\$1,010	\$1,148	13.7%
Lower Milford Twp.	\$473	\$601	\$1,180	96.4%
Lowhill Twp.	\$554	\$704	\$775	10.2%
Lynn Twp.	\$533	\$677	\$1,019	50.5%
Macungie Boro.	\$732	\$930	\$946	1.8%
North Whitehall Twp.	\$619	\$786	\$742	-5.6%
Salisbury Twp.	\$651	\$827	\$952	15.1%
Slatington Boro.	\$554	\$704	\$698	-0.8%
South Whitehall Twp.	\$788	\$1,001	\$788	-21.3%
Upper Macungie Twp.	\$864	\$1,097	\$1,159	5.6%
Upper Milford Twp.	\$642	\$815	\$1,075	31.8%
Upper Saucon Twp.	\$706	\$897	\$829	-7.5%
Washington Twp.	\$584	\$742	\$635	-14.4%
Weisenberg Twp.	\$682	\$866	\$878	1.4%
Whitehall Twp.	\$661	\$839	\$882	5.1%
Pennsylvania	\$531	\$674	\$739	9.6%

Source: 2010 Five-Year American Community Survey (B25064)

The Cost of Housing

The cost of housing is different than the value of housing. The value of a housing unit is determined by assessing comparable units in similar neighborhoods to calculate the amount the unit might sell for. The cost of housing, however, is the calculation of how much a household must earn in order to purchase or rent a housing unit. One of the most credible and widely used sources of information about housing cost and affordability is the National Low Income Housing Coalition's (NLIHC) annual publication *Out of Reach*.

According to NLIHC's 2012 *Out of Reach*, in Lehigh County, the fair market rent (FMR) for a two-bedroom apartment is \$954. In order to afford this level of rent and utilities without paying more than 30% of income on housing, a household must earn \$38,160 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a housing wage of \$18.35.

In Lehigh County, a minimum wage worker earns an hourly wage of \$7.25. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 102 hours per week, 52 weeks per year. Or, a household must include 2.5 minimum wage earner(s) working 40 hours per week year-round in order to make the two bedroom FMR affordable.

In Lehigh County, the estimated mean (average) wage for a renter is \$12.92 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 57 hours per week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.4 workers earning the mean renter wage in order to make the two-bedroom FMR affordable.

Housing Condition

The condition of the housing stock in Lehigh County can be determined using census variables chosen to indicate housing deficiency. The age of a structure is used to show the time the unit has been in the inventory and the duration of time for which deterioration can potentially occur. The age threshold commonly used to signal a potential deficiency is approximately 50 years. Another variable used to identify housing condition is overcrowding, which is directly related to the wear and tear sustained by the structure. Generally, the criterion of more than one person per room (1.01) is used as the threshold for defining living conditions as overcrowded.

For the purposes of the Five-Year Strategic Plan, the age of the housing stock in the low and moderate income census tracts was identified. Of particular interest are the census tracts containing older housing units and located in areas of concentration of LMI persons and racial and ethnic minorities. These areas are described in greater detail in response to Question 20 on page 63. Lower income levels typically indicate where the greatest potential for housing deterioration can occur as these households will have less disposable income to pay for regular maintenance and repairs. Without these actions, older homes can rapidly deteriorate.

COUNTY OF LEHIGH

In Lehigh County, 0.7% of all owner units and 2.2% of all renter units were overcrowded as reported in the 2010 Census. The following two tables, Tables 16 and 17, provide information on housing quality for owner-occupied and renter-occupied units in the county.

Fountain Hill Borough, Allentown and Bethlehem have the highest percentage of owner-occupied housing over 50 years old, while Heidelberg Township and South Whitehall Township had the highest percentage of overcrowded owner-occupied units.

Table 16
Housing Quality Indicators of Owner-Occupied Housing Stock, 2010

	Total Owner-Occupied Housing Units	Over 50 years old		Lacking complete plumbing		Overcrowded	
		Total	% Owner-Occupied	Total	% Owner-Occupied	Total	% Owner-Occupied
Lehigh County	91,431	39,879	43.6%	197	0.2%	407	0.4%
Alburtis Boro.	716	227	31.7%	0	0.0%	0	0.0%
Allentown City	21,819	16,497	75.6%	35	0.2%	178	0.8%
Bethlehem City (part)	4,902	3,924	80.0%	34	0.7%	14	0.3%
Catasauqua Boro.	1,763	1,032	58.5%	0	0.0%	0	0.0%
Coopersburg Boro.	674	320	47.5%	0	0.0%	0	0.0%
Coplay Boro.	1,105	823	74.5%	0	0.0%	10	0.9%
Emmaus Boro.	3,110	2,014	64.8%	23	0.7%	0	0.0%
Fountain Hill Boro.	1,235	1,035	83.8%	0	0.0%	7	0.6%
Hanover Twp.	325	105	32.3%	0	0.0%	0	0.0%
Heidelberg Twp.	1,310	274	20.9%	0	0.0%	14	1.1%
Lower Macungie Twp.	9,808	679	6.9%	11	0.1%	42	0.4%
Lower Milford Twp.	1,419	468	33.0%	9	0.6%	0	0.0%
Lowhill Twp.	736	130	17.7%	0	0.0%	5	0.7%
Lynn Twp.	1,522	604	39.7%	13	0.9%	0	0.0%
Macungie Boro.	796	287	36.1%	0	0.0%	0	0.0%
North WhitehallTwp.	5,089	826	16.2%	21	0.4%	0	0.0%
Salisbury Twp.	4,740	1,577	33.3%	0	0.0%	7	0.1%
Slatington Boro.	1,054	723	68.6%	0	0.0%	0	0.0%
South Whitehall Twp.	6,316	2,347	37.2%	0	0.0%	65	1.0%
Upper Macungie Twp.	5,788	556	9.6%	0	0.0%	31	0.5%
Upper Milford Twp.	2,208	752	34.1%	28	1.3%	0	0.0%
Upper Saucon Twp.	4,092	1,087	26.6%	0	0.0%	0	0.0%
Washington Twp.	2,280	622	27.3%	13	0.6%	9	0.4%
Weisenberg Twp.	1,691	175	10.3%	0	0.0%	0	0.0%
Whitehall Twp.	6,933	2,795	40.3%	10	0.1%	25	0.4%
Pennsylvania	3,508,612	1,660,793	47.3%	13,316	0.4%	23,706	0.7%

Source: 2010 Five-Year American Community Survey

Table 17
Housing Quality Indicators of Renter-Occupied Housing Stock, 2010

	Total Renter- Occupied Housing Units	Over 50 years old		Lacking complete plumbing		Overcrowded	
		Number	% Renter- Occupied	Number	% Renter- Occupied	Number	% Renter- Occupied
Lehigh County	38,010	19,237	50.6%	97	0.3%	1,344	3.5%
Alburtis Boro.	96	65	67.7%	0	0.0%	0	0.0%
Allentown City	21,919	11,683	53.3%	70	0.3%	1,005	4.6%
Bethlehem City (part)	3,504	1,323	37.8%	0	0.0%	11	0.3%
Catasauqua Boro.	797	381	47.8%	0	0.0%	44	5.5%
Coopersburg Boro.	303	204	67.3%	0	0.0%	0	0.0%
Coplay Boro.	292	199	68.2%	0	0.0%	53	18.2%
Emmaus Boro.	1,533	629	41.0%	0	0.0%	13	0.8%
Fountain Hill Boro.	698	545	78.1%	0	0.0%	0	0.0%
Hanover Twp.	352	28	8.0%	0	0.0%	17	4.8%
Heidelberg Twp.	121	55	45.5%	0	0.0%	0	0.0%
Lower Macungie Twp.	1,148	158	13.8%	0	0.0%	0	0.0%
Lower Milford Twp.	39	31	79.5%	0	0.0%	0	0.0%
Lowhill Twp.	74	34	45.9%	0	0.0%	0	0.0%
Lynn Twp.	115	80	69.6%	0	0.0%	0	0.0%
Macungie Boro.	613	165	26.9%	0	0.0%	0	0.0%
North Whitehall Twp.	716	270	37.7%	0	0.0%	14	2.0%
Salisbury Twp.	693	306	44.2%	0	0.0%	11	1.6%
Slatington Boro.	680	434	63.8%	27	4.0%	16	2.4%
South Whitehall Twp.	1,340	528	39.4%	0	0.0%	6	0.4%
Upper Macungie Twp.	1,071	128	12.0%	0	0.0%	0	0.0%
Upper Milford Twp.	475	343	72.2%	0	0.0%	9	1.9%
Upper Saucon Twp.	396	159	40.2%	0	0.0%	8	2.0%
Washington Twp.	275	139	50.5%	0	0.0%	36	13.1%
Weisenberg Twp.	146	111	76.0%	0	0.0%	0	0.0%
Whitehall Twp.	4,052	1,239	30.6%	0	0.0%	101	2.5%
Pennsylvania	1,431,969	765,128	53.4%	9,862	0.7%	31,940	2.2%

Source: 2010 Five-Year American Community Survey

13. Provide an estimate, to the extent information is available, of the number of vacant or abandoned buildings and whether units in these buildings are suitable for rehabilitation.

The 2010 Census reports on the number of vacant housing units as shown on Table 18. This data does not allow us to estimate the condition of these units. However, from the listing of foreclosed properties shown on RealtyTrac®, which, as of April 27, 2012, showed 1,591 county properties in foreclosure, including approximately 350 in Allentown and Bethlehem, it is evident that many of the vacant homes may be suitable for rehabilitation and sale. During the public hearing, these newly vacated homes were cited by municipal officials as a problem for the communities and neighborhoods. Not only do they represent a loss of housing by local residents, but a loss of tax revenue to the community and a possible attractive nuisance as conditions deteriorate.

The table below shows the number of vacant units in Lehigh County.

Table 18
Lehigh County: Number of Vacant Units, 2010

	Number of Units
Vacant Housing Units	203,200
For Rent	191,600
Rented, Not Occupied	143,500
For sale only	175,700
Sold, not occupied	138,900
For seasonal, recreational, or occasional use	227,000
All other vacant units	170,400

Source: 2010 U.S. Census

PUBLIC AND ASSISTED HOUSING 91.210 (b)

14. In cooperation with the public housing agency or agencies located within its boundaries, describe the needs of public housing, including

- the number of public housing units in the jurisdiction,
- the physical condition of such units,
- the restoration and revitalization needs of public housing projects within the jurisdiction,
- the number of families on public housing and tenant-based waiting lists and
- results from the Section 504 needs assessment of public housing projects located within its boundaries (i.e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25).

The jurisdiction can use the optional Priority Public Housing Needs Table of the Consolidated Plan to identify priority public housing needs to assist in this process.

Five-Year Strategic Plan Needs of Public Housing response:

The Lehigh County Housing Authority (LCHA) operates 289 public housing units scattered throughout the County. The Housing Authority does not intend to demolish or construct any new public housing in the foreseeable future.

Recent initiatives by the LCHA to improve operations and performance have led to an occupancy rate above 98%. Over the next two years, LCHA will begin an extensive upgrade of the fire prevention, control and alarm systems in all public housing properties.

LCHA works closely with the Good Shepherd Rehabilitation Center and the Center for Independent Living in Allentown, PA to keep up with the current technologies available to help meet the needs of its residents with disabilities. LCHA manages a facility in Bethlehem that is designed for and leased to persons with severe physical disabilities. In addition, LCHA manages a 20-unit independent living facility designed for and occupied by persons with mental illness, and it owns 12 homes used as group homes for persons with an intellectual disability. LCHA works closely with the providers of care at these facilities to ensure they are meeting the needs of the residents. Since LCHA is not planning to rehabilitate any existing properties or to build any new properties, the extent of its physical accommodation work is by request of existing or prospective residents of the current facilities. LCHA will also take physical accommodation requests from caregivers or agencies representing persons with disabilities, and remains dedicated to making reasonable accommodations based upon its policies and procedures.

The need for local affordable housing remains substantial, as is apparent in review of the waiting list for public housing. The number of applicants on the public housing waiting list has risen substantially in the last five years, quadrupling since the last Consolidated Plan. In February 2012, there were 4,234 households on the list, the majority of which (58.7%) were small households. The waiting list is currently closed. Notably, Hispanic households comprised over 40% of those on the waiting list, an increase from 31% five years ago.

In addition, the Section 8 waiting list also shows the need for affordable housing. In February 2012, there were 509 households on the waiting list.

Table 19 provides information on the waiting list of applicants for public housing and Section 8 as provided by the Lehigh County Housing Authority for February, 2012.

Table 19
Public Housing and Section 8 Waiting List, 2012

	Public Housing		Section 8	
	Number	Percent	Number	Percent
Waiting List Total	4,234	100%	509	100%
Income				
Extremely Low Income (<30% MFI)	3,427	80.9%	265	N/A
Very Low Income (>30% but <50% MFI)	715	16.9%	244	N/A
Low Income (>50% but <80%)	92	2.2%	-	N/A
Family Size				
Individual	1,422	33.6%	223	43.8%
Small (2-4 members)	2,491	58.8%	244	47.9%
Large (5+ members)	321	7.6%	42	8.3%
Age				
Elderly	215	5.1%	150	29.5%
Non-elderly	4,019	94.9%	359	70.5%
Disabled	500	11.8%	99	19.4%
Race/Ethnicity				
White Households	3,046	71.9%	484	86.1%
Black Households	1,137	26.9%	67	13.2%
Other Race of Households	51	1.2%	4	0.8%
Hispanic Households	1,760	41.6%	131	25.7%

Source: Lehigh County Housing Authority, 2012

Table 20 contains demographic information on LCHA's current public housing residents. As of February 2012, 27% of public housing tenants consisted of households with a physically disabled member. The elderly were the largest occupants of LCHA's units.

Table 20
Public Housing Resident Characteristics, 2012

	Total	%
Income		
Extremely low (<30% AMI)	289	100.0%
Very low (30%-50% AMI)	0	0.0%
Low (50%-80% AMI)	0	0.0%
Household size		
Small (1-4 members)	281	97.0%
Large (5 or more members)	8	3.0%
Special needs status		
Elderly	210	73.0%
With disabilities	77	27.0%
Race		
White	364	89.0%
Black	40	10.0%
Other	6	1.0%
Total		100.0%

Source: Lehigh County Housing Authority, 2012

15. Describe the number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, (i.e. expiration of Section 8 contracts).

The Pennsylvania Housing Finance Agency (PHFA) provides an on-line housing locator service, PAHousingSearch.com that allows the public to identify assisted housing units available for rent. The units are identified by the following categories: income-based, senior housing or handicap accessible, and whether there is a waiting list. Assisted units include Section 236 units subsidized with project-based Section 8 vouchers, tax credit affordable units, or market rate housing. A listing can be found in Appendix 4.

It is expected that some affordable housing inventory units may be lost over the next five years, particularly those with expiring federal assistance. Valley Housing Development Corporation (VHDC), in particular, is studying ways to sustain their units and preserve the affordability of the housing. In June, 2012, VHDC received a Low-Income Housing Tax Credit allocation to preserve the affordability of 4 family developments in the cities of Allentown and Bethlehem.

HOMELESS INVENTORY 91.210 (c)

16. The jurisdiction shall provide a concise summary of the existing facilities, housing and services that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. The inventory of facilities and housing (e.g., emergency shelter, transitional housing, and permanent supportive housing) must be presented in a form specified by HUD. The inventory of services must include services targeted to homeless persons and main stream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons.

The jurisdiction can use the optional Continuum of Care Housing Activity Chart and Service Activity Chart to meet this requirement.

Five-Year Strategic Plan Homeless Inventory response:

The Lehigh Valley has a very extensive network of shelters and housing programs. The Continuum of Care tables can be found on the following pages. The agencies within the Lehigh Valley receive funding through the federal McKinney Continuum of Care program. The NE Regional Housing Advisory Board (NE RHAB) coordinates the application process. In addition, the City of Allentown is an Emergency Solutions Grant (ESG) direct HUD entitlement. Lehigh County DCED will apply for funds through the Pennsylvania Department of Community and Economic Development on behalf of shelters in its jurisdiction. The listing of providers of emergency, transitional and permanent supportive housing in the region and those services located in the Lehigh Valley follow.

Table 21
Fundamental Components in CoC System Shelter beds

2012 - Organization Name	2012 - Program Name	Bed Type	Target Pop. A	Target Pop. B	McKinney-Vento	Beds HH w/ Children	Units HH w/ Children	Beds HH w/o Children	Year-Round Beds	Total Seasonal Beds	Seasonal Beds Available in HMIS	Overflow Beds	PIT Count
Allentown Rescue Mission	Allentown Rescue Mission Emergency Shelter	Facility-based beds	SM	NA	Yes			48	48	0	0	0	30
Allentown Salvation Army	Hospitality House - ES	Facility-based beds	HC	NA	Yes	41	9	4	45	0	0	0	25
Bethlehem Coalition of Churches	Seasonal Beds at Eleven Area Churches	Other beds	SMF	NA	No	0	0	0	0	9	0	0	9
Community Action Commission of Lehigh Valley (CACLV)	6th Street Shelter	Facility-based beds	HC	NA	Yes	76	20	0	76				65
Endless Mountain Mission Center	Endless Mountain Mission Center	Other beds	SMF+HC	NA	No	7	2	1	8	0	0	0	1
Family Promise of Carbon County	Family Promise of Carbon County	Other beds	HC	NA	No	14	1	0	14	0	0	0	9
Family Promise of Monroe County	Step-up Program	Other beds	HC	NA	Yes	14	4		14				5
Haven of Tioga County	Haven of Tioga County	Facility-based beds	SMF+HC	DV	No	8	3	1	9	0	0	0	0
Safe Harbor	Safe Harbor Emergency Shelter - Easton	Facility-based beds	SMF	NA	Yes			26	26	0	0	4	30
Safe Haven Inc. of Pike County	Safe Haven	Other beds	SMF+HC	DV	No	8	2	0	8	0	0	0	8
Salvation Army of East Stroudsburg	Salvation Army Emergency Shelter	Facility-based beds	SMF+HC	NA	Yes	13	4	18	31				20
Schuylkill Women in Crisis (SWIC)	Schuylkill Shelter	Facility-based beds	SFHC	DV	Yes	20	2	12	32	0	0	0	16
Sullivan County Victim Services	Sullivan County Victim Services	Facility-based beds	SFHC	DV	No	1	1	0	1	0		0	0
Third Street Alliance for Women & Children Inc.	Third Street Alliance Shelter	Facility-based beds	SFHC	NA	No	14	6	6	20	0	0	0	13
Tioga County Homeless Initiative	Emergency Shelter	Other beds	SMF+HC	NA	No	0	0	0	0	12	0	0	2
Turning Point of the Lehigh Valley Inc.	Lehigh Shelter	Facility-based beds	SFHC	DV	No	30	7	2	32	0	0	0	19
Valley Youth House Committee Inc.	Valley Youth House - ES	Facility-based beds	YF	NA	No	0	0	0	12	0	0	0	6
Victory House of Lehigh Valley	Level 1: non-GPD	Facility-based beds	SM	NA	Yes			19	19	0	0	0	18
Women's Resources of Monroe Co. Inc.	Monroe Shelter	Facility-based beds	SMF+HC	DV	Yes	11	2	11	22	0	0	0	15
TOTALS						257	63	148	417	21	0	4	291

Transitional Housing

2012 - Organization Name	2012 - Program Name	Geo Code	Inventory Type	Target Pop. A	Target Pop. B	McKinney-Vento	Beds HH w/ Children	Units HH w/ Children	Beds HH w/o Children	Year-Round Beds	HMIS Beds HH w/ Children	HMIS Beds HH w/o Children	HMIS Beds HH w/ only Children	PIT Count
Allentown Rescue Mission	Christian Living Transitional Program	420096 C	SM	NA	NA	No			34	34		0		30
Community Action Commission of Lehigh Valley (CACLV)	Ferry St. Apts.	421950 C	HC	NA	NA	Yes	20	10		20	20			19
Community Action Commission of Lehigh Valley (CACLV)	Turner St. Apts.	420096 C	HC	NA	NA	No	34	12		34	34			31
Easton Area Neighborhood Centers Inc.	Roofover (ESG)	421950 C	HC	NA	NA	No	25	5	0	25	25	0	0	11
New Bethany Ministries	Restoration House	420504 C	HC	NA	NA	Yes	32	10		32	32			26
New Bethany Ministries	Transitional Shelter Program	420504 C	HC	NA	NA	Yes	45	13		45	45			37
Pocono Area Transitional Housing	PATH - 2 locations	429089 C	SFHC	NA	NA	No	49	13	0	49	0	0	0	28
Salisbury Behavioral Health, Inc	New Beginnings	429089 C	SM	NA	NA	Yes			9	9		9		9
Salvation Army	Hospitality House - TH	420096 C	HC	NA	NA	Yes	24	6	0	24	24	0	0	9
Schuylkill Community Action	Schuylkill Co. Bridge House	429107 C	SFHC	NA	NA	No	9	4	8	17	0	0	0	17
Schuylkill Women in Crisis (SWIC)	Transitional Housing for Victims of DV	429107 C	HC	DV	DV	Yes	21	8		21				16
The Program for Women & Families Inc.	Transitional Residence CoC Initiative	420096 C	SFHC	NA	NA	Yes	17	5	2	19	17	2	0	9
Third Street Alliance for Women & Children Inc.	Third Street Alliance - TH	421950 C	SFHC	NA	NA	No	23	9	5	28	0	0	0	16
Tioga Co. Dept. of Human Services	St. James Complex	429117 C	SMF+HC NA	NA	NA	No	27	10	8	35	0	0	0	35
United Christian Ministries Inc.	Cowanessque by the Lake	429117 C	SMF+HC NA	NA	NA	Yes	7	3	3	10	7	3	0	10
Valley Youth House Committee Inc.	Maternity Group Home	429077 C	SMF+HC NA	NA	NA	No	6	3	2	10	0	0	0	5
Valley Youth House Committee Inc.	Supportive Housing for Families (Lehigh & Nhtn Co)	429077 C	HC	NA	NA	Yes	50	14		50	50			50
Valley Youth House Committee Inc.	Supportive Housing for Youth	420096 C	SMF+HC NA	NA	NA	Yes	30	15	12	42	30	12	0	43
Valley Youth House Committee Inc.	Transitional Housing Program	420096 C	SMF	NA	NA	No			3	6		0	0	5
Victory House of Lehigh Valley	GPD - Levels 1, 2, 3	429095 C	SM	VET	VET	Yes			19	19		19		17
Victory House of Lehigh Valley	Level 2: non-GPD	429095 C	SM	NA	NA	Yes			2	2		2		0
TOTALS							419	140	107	531	284	47	0	423

Permanent Supportive Housing

2012 - Organization Name	2012 - Program Name	Geo Code	Inventory Type	Target Pop. A	Target Pop. B	McKinney-Vento	Beds HH w/ Children	Units HH w/ Children	Beds HH w/o Children	CH Beds	Year-Round Beds	PIT Count
Bradford Co. Human Services	Bradford/Sullivan Counties Homeless Assistance Program	429015	C	SMF	NA	Yes	0	0	10	10	10	11
Catholic Charities of the Diocese of Allentown	Permanent Supportive Housing	429077	N	SMF+HC	NA	Yes	6	3	6	1	12	0
Catholic Social Services of the Diocese of Scranton Inc.	PSHP in Pike County	429103	U	SMF	NA	Yes			6	6	6	
Catholic Social Services of the Diocese of Scranton Inc.	Rural Permanent Supportive Housing Program (PSHP)	429089	C	SMF	NA	Yes			8	8	8	8
Catholic Social Services of the Diocese of Scranton Inc.	Susquehanna/Wayne PSH	429115	N	SMF	NA	Yes			9	9	9	9
Flitmaurice Community Services Inc.	Pathfinders	429089	C	SMF	NA	Yes			12	0	12	12
Flitmaurice Community Services Inc.	West Hills Apartments	429089	C	SMF+HC		Yes	2	1	10	0	12	12
Futures Community Support Services	Eastside Sayre Affordable Housing Project	429015	C	SMF+HC	NA	Yes	4	1	2	0	6	6
GAUDENZIA FOUNTAIN SPRINGS	FOUNTAIN SPRINGS APARTMENTS	429107	C	SFHC	NA	Yes	14	6		0	14	9
Housing Authority of Monroe Co.	S+C	429089	C	SFHC	NA	Yes	18	6	15	0	33	33
Housing Development Corporation of NEPA	PH for Persons with Disabilities	429131	C	SMF+HC	NA	Yes	29	7	3	0	32	29
Lehigh Co. Conference of Churches	TBRA for the Disabled & CH	429077	C	SMF	NA	Yes			22	22	22	22
Lehigh Co. Housing Authority	S+C	429077	C	SMF+HC	NA	Yes	0	0	22	0	22	17
Lehigh County Clearinghouse Housing Program	Lehigh County Clearinghouse Housing Program	429077	N	SMF+HC	NA	No	20	8	15	7	35	35
New Bethany Ministries	Grace House Project	420504	N	SMF	NA	No			6	0	6	4
Northampton Co. Housing Authority	S+C	429095	C	SMF+HC	NA	Yes	4	2	8	0	12	12
Resources for Human Development Inc.	Crossroads Housing Bonus	429089	N	SMF+HC	NA	Yes	6	3	7	4	13	13
Resources for Human Development Inc.	Crossroads Supportive Family Housing Program	429089	C	HC	NA	Yes	31	11	1	0	32	32
Resources for Human Development Inc.	Crossroads Supportive Housing Program	429089	C	HC	NA	Yes			26	0	26	26
Resources for Human Development Inc.	LVACT Housing Support Program	429095	C	SMF	NA	Yes	2	1	19	16	21	19
United Christian Ministries Inc. (SRO)	Kenner Court + Garnet House (SRO)	429117	C	SMF	NA	Yes			15	0	15	15
Valley Housing Development Corporation	PH for Homeless Persons w/MI-I	429077	C	SMF+HC	NA	Yes	12	5	27	0	39	33
Valley Housing Development Corporation	PH for Homeless Persons w/MI-II	429077	C	SMF+HC	NA	Yes	0	0	17	0	17	16
Valley Housing Development Corporation	PH for Homeless Persons w/MI-III	429077	C	SMF	NA	Yes	0	0	15	0	15	11
TOTALS							148	54	281	83	429	384

Services

(1) Provider Organizations	(2) Prevention					(3) Outreach			(4) Supportive Services									
	Mortgage Assistance	Rental Assistance	Utilities Assistance	Counseling/Advocacy	Legal Assistance	Street Outreach	Mobile Clinic	Law Enforcement	Case Management	Life Skills	Alcohol & Drug Abuse	Mental Health Counseling	Healthcare	HIV/AIDS	Education	Employment	Child Care	Transportation
AIDSNET														X				
AIDS Action														X				
AIDS Service Center – St. Luke’s				X										X				
Allentown Rescue Mission									X	X								
Allentown School District – Homeless Childrens’ Initiative Project															X			
Alliance for Building Communities				X														
Allied Services												X						
ARC of Lehigh & Northampton Counties																X		
Ashland Regional Medical Center													X					
CareerLink (WIA) in each County																X		
Casa Guadalupe Center			X	X										X	X			
Catholic Charities		X	X	X		X			X									
Child Care Information Service (CCIS) in every County																	X	
Community Action Committee of Lehigh Valley			X	X					X	X								
Community Service Foundation Inc. Buxmont Academy/Bethlehem											X							
Community Services for Children															X		X	
Consumer Credit Counseling	X			X														
Council of Spanish Speaking Organizations of Lehigh Valley										X				X	X	X		
Council on Alcohol and Drug Abuse											X							
County Assistance Offices – Emergency Shelter Allowance (at least one office in each County)		X	X															
County Assistance Offices – LIHEAP (at least one office in each County)			X															
County Sheriff’s Office – (all counties)	X																	
Easton Area Neighborhood Centers, Inc.	X	X	X						X	X								

(1) Provider Organizations	(2) Prevention					(3) Outreach			(4) Supportive Services									
	Mortgage Assistance	Rental Assistance	Utilities Assistance	Counseling/Advocacy	Legal Assistance	Street Outreach	Mobile Clinic	Law Enforcement	Case Management	Life Skills	Alcohol & Drug Abuse	Mental Health Counseling	Healthcare	HIV/AIDS	Education	Employment	Child Care	Transportation
Easton Hospital													X					
Emergency Food and Shelter Program Board (aka, FEMA Board one in each County, or groups of counties)	X		X															
Families First			X	X												X		
Fighting AIDS Continuously Together													X					
Good Samaritan Counseling Center											X							
Good Samaritan Health Center/North													X					
Good Shepherd Rehab													X					
Hispanic American Organization		X	X	X					X		X				X		X	
Hogar Crea Womens Center											X							
Jewish Family Services												X						
LANTA METRO																		X
Lehigh Co. Conference of Churches						X			X		X		X					
Lehigh County Drug and Alcohol Abuse Services						X					X							
Lehigh County Housing Authority									X	X								
Lehigh County Public Welfare																X		
Lehigh Valley Center for Independent Living				X														
Lehigh Valley Children Centers, Inc.																	X	
Lehigh Valley Community Mental Health Center												X						
Lehigh Valley Health Network													X					
Lehigh Valley Hospital													X					
Livengrin Counseling Center											X							
Mosser Village Family Center				X											X	X	X	
Neighborhood Housing Services of the Lehigh Valley				X														
New Bethany Ministries									X	X			X					
New Directions Treatment Services											X		X					
Office of Vocational Rehabilitation (OVR) in each County																X		

(1)	(2) Prevention					(3) Outreach			(4) Supportive Services									
	Mortgage Assistance	Rental Assistance	Utilities Assistance	Counseling/Advocacy	Legal Assistance	Street Outreach	Mobile Clinic	Law Enforcement	Case Management	Life Skills	Alcohol & Drug Abuse	Mental Health Counseling	Healthcare	HIV/AIDS	Education	Employment	Child Care	Transportation
Provider Organizations																		
Pathways/Lehigh Co. Conference of Churches	X	X	X															
Private Industry Council																X		
The Program for Women and Families									X	X								
REDCO Group																X		
Salvation Army						X			X	X					X			
Sacred Heart Hospital													X					
Salisbury Behavioral Health												X						
St. Luke's Hospital and Health Network												X	X					
Third Street Alliance for Women & Children, Inc.									X	X							X	
Treatment Trends Inc.											X							
Turning Point of Lehigh Valley									X	X								
Valley Youth House						X			X	X								
VIA																X		

SPECIAL NEED FACILITIES AND SERVICES 91.210 (d)

17. Describe, to the extent information is available, the facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring persons returning from mental and physical health institutions receive appropriate supportive housing.

Lehigh County provides a full range of services and facilities for persons with special needs. The following table includes facilities and services that assist persons who are not homeless but who require supportive housing, and programs that ensure that persons returning from mental and physical health institutions receive appropriate supportive housing. The Department of Human Services provides a wide range of programs for elderly, substance abuse, persons with mental health and intellectual disabilities, children and youth and veterans.

Table – 22
Local Resources for Special Needs Populations

Domestic Abuse Victims	Youth
Turning Point of the Lehigh Valley	Valley Youth House
Elderly	Substance Abuse
See PAHousingSearch.com	none
Cedar Brook Apartments	
Physically/Mentally/Developmentally Disabled	HIV/AIDS
Lehigh Valley Center for Independent Living	AIDSNET – regional managed care contractor for the Commonwealth of Pennsylvania
Lehigh County Conference of Churches	HOPWA rental assistance
	Veterans
	VASH – Veterans Assistance Supportive Housing

Through discharge planning, persons leaving mental institutions and the County prison are directed to appropriate housing. The policies of the Commonwealth and County regarding discharge prohibit discharge to a condition of homelessness. The Lehigh County Department of Mental Health has indicated that much of its housing capacity over the coming years will be dedicated to persons returning to the community from state hospitals.

BARRIERS TO AFFORDABLE HOUSING 91.210 (e)

18. Explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.

Lehigh County recognizes that there are barriers that prevent access to affordable housing for some populations. There are also impediments that affect the maintenance, production and renovation of quality rental housing and the promotion of new construction and renovation of owner-occupied units.

The Affordable Housing Policy Advisory Committee and the Land Use Planning subcommittee in particular, has examined the issue of local public policy and its impact on the ability of the communities in the County to provide affordable housing. The Housing Needs Assessment prepared by the Bi-County Planning Commission also addressed these questions.

The following impediments to developing affordable housing in the Lehigh Valley were identified by developers and others interviewed for the Bi-County Planning Commission assessment:

- The high cost of land, specifically undeveloped land
- Difficulty in finding land
- Inadequate supply of development sites in general
- Insufficient supply of land zoned for multi-family housing
- Relocation and demolition costs in projects involving site assembly
- The NIMBY (“Not In My Backyard”) response
- In distressed areas, achievable rents are too low to meet operating expenses, thereby making some projects infeasible to finance without high subsidies.
- The increasing costs of ongoing property management, such as real estate taxes, insurance, management and maintenance, make it difficult for developers to offer quality management services, thereby making smaller projects less viable.
- The cost of lead-based paint abatement is significantly increasing the rehabilitation cost of older housing units, and subsequently, causing a decrease in the number of housing units rehabilitated.
- Non-profit developers having an inadequate supply of capital to meet pre-development expenses severely limits their ability to explore the feasibility of potential projects as prospects arise.
- Total development costs are greater than achievable sales prices for homeownership projects. As a result, the actual cost of developing housing can be twice as high as the sales prices of affordable units to lower income households.

- In high growth areas, market rate projects offer higher profit margins to builders and developers, thereby reducing the supply of labor and number of firms interested in affordable housing.
- Market rate transactions on owner-occupied dwellings offer fewer challenges and higher commissions to real estate professionals.
- Continuously shrinking state and federal funding sources to subsidize affordable housing projects.

In addition, the cost of maintenance and rehabilitation of older homes and shrinking resources to address these needs is a barrier to affordable housing. Vacant homes that become blighted further hinder community revitalization efforts and the opportunity to preserve the affordable housing stock.

Lehigh County intends to encourage good, affordable housing, and will continue to work with property owners, developers, non-profit community housing providers, and others to diversify the rental housing stock and modernize existing units.

STRATEGIC PLAN

GENERAL PRIORITY NEEDS ANALYSIS AND STRATEGIES 91.215 (a)

19. In this narrative, describe the reasons for setting priorities for allocating investment among different activities and needs, as identified in tables* prescribed by HUD. 92.215(a)(1)

***If not using the CPMP Tool:** Complete and submit Table 1A Homeless and Special Needs Population; Table 1B Special Needs (Non-Homeless) Populations; Table 2A Priority Housing Needs/Investment Plan Table; and Table 2B Priority Community Development Needs.

***If using the CPMP Tool:** Complete and submit the Needs Table file: Needs.xls

CDBG funds are intended to provide low- and moderate-income households with viable communities, decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning and administration.

The housing, special needs and community development priorities established in this Five-Year Strategy Plan were developed through a comprehensive public outreach process. This process included public meetings, stakeholder interviews, focus group meetings, and a public review period. Additionally, the priorities reflect policy directives that have emerged from local and regional planning initiatives.

To guide the next five years of funding, the following criteria were used to establish priorities in the selection of projects:

- Meeting the statutory requirements of the CDBG program
- Focusing on low and moderate income areas or neighborhoods in the County
- Coordinating and leveraging resources
- Response to expressed needs
- Sustainability and/or long-term impact

20. Describe the geographic areas of the jurisdiction (including areas of low-income families and/or racial/minority concentration) in which assistance will be directed.

General Demographic Characteristics

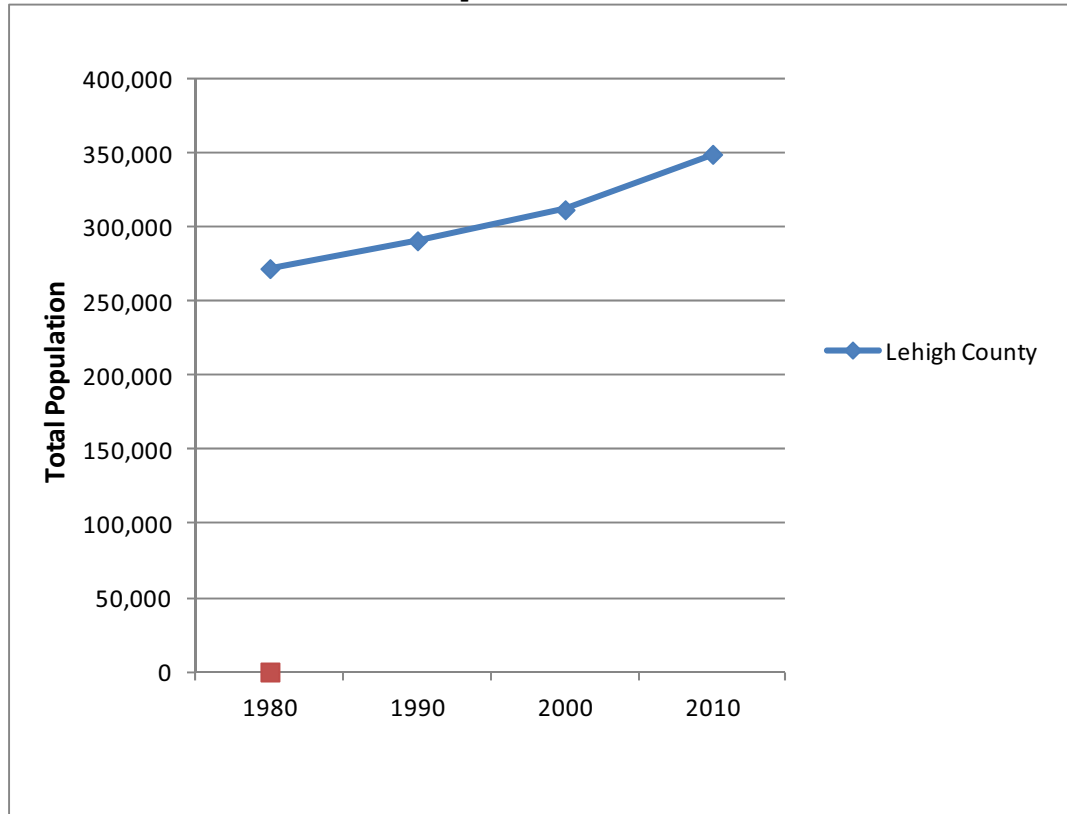
In this section of the Five-Year Strategic Plan, demographic and socio-economic characteristics of Lehigh County are described to identify trends, existing conditions and estimated projections. Unless otherwise noted, the statistical information in this section was derived primarily from census reports, 2000 and 2010, published by the U. S. Census Bureau and population data from the Lehigh Valley Planning Commission. Lehigh County continues to refer to those communities participating in the Urban County and excludes Allentown and Bethlehem unless otherwise noted.

Lehigh County will use the findings and conclusions of this analysis to identify priorities and formulate strategies for the use of its federal entitlement Community Development Block Grant (CDBG) program funds.

Population

Overall, the population of Lehigh County, including Allentown and Bethlehem, increased between 1980 and 2010. From 1980 to 2010 the population increased by 28.3%, or 77,148 persons. This growth rate was four times the rate for Pennsylvania, which grew 7.1% during the same time period. Between 2000 and 2010 alone, Lehigh County's population grew by 12%. This rapid population growth presents new opportunities and challenges to provide additional housing and services to meet the needs of the growing population.

Table 23
Total Population 1980-2000

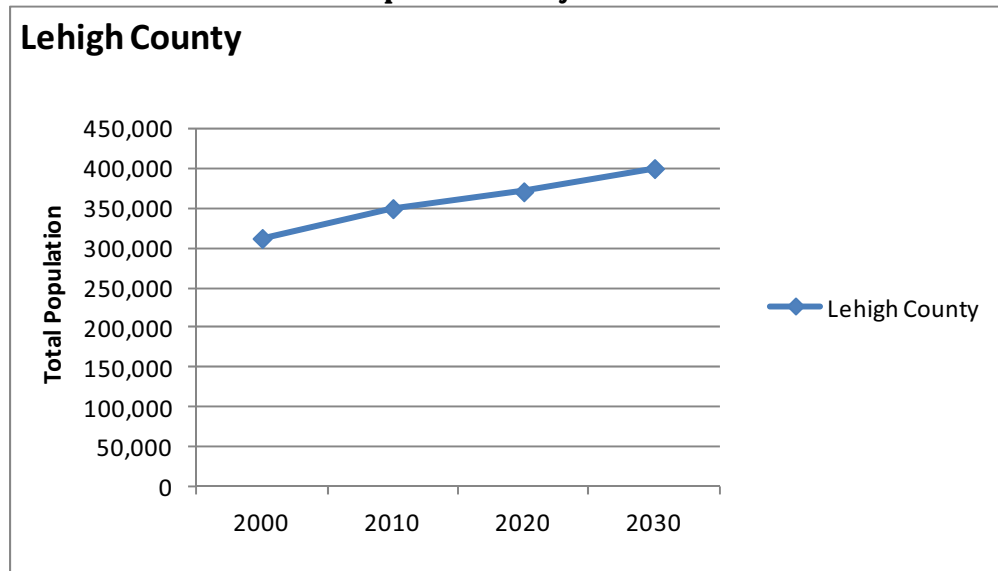


Source: 2010 U.S. Census

Recent population projections prepared by the Lehigh Valley Planning Commission (LVPC) in May 2012 illustrate the anticipated continuing growth over the next thirty years.

LVPC has projected that the population for Lehigh County will increase to almost 470,000 by 2040, an increase of 34.4%. This projected increase in population represents faster growth than experienced in the previous thirty years (1980-2010). Much of this increase in population is due to migration patterns, including the westward expansion of metropolitan areas from New Jersey and New York. Migration accounted for over 80% of Lehigh County's total population growth of 34,407 persons during the 2000s. According to LVPC, the Philadelphia area is the secondary source of migration to the Lehigh Valley.

Table 24
Population Projections



Areas of Concentrations of Racial and Ethnic Minorities

For Lehigh County, including Allentown and Bethlehem, the 2010 Census reported that White residents accounted for 79.1% of the County's population, Black residents accounted for 6.1% of the population, American Indian/Alaskan Natives less than 1% (0.4%), Asian/Pacific Islanders 3%, Other/Two or More Races 11.5%, and Persons of Hispanic Ethnicity (regardless of race) accounted for 5.9% of the population.

One of the objectives of the strategic planning process is to determine if there are any areas of concentrations of racial minority or ethnic groups in the County. Areas of concentrations of racial or ethnic minorities are generally those census tracts where the rate of minority or ethnic persons is greater than the rate for the County as a whole. Since Lehigh County is a part of the Lehigh Valley, which includes Northampton County, the rate of minority and ethnic persons for Northampton County was included in the calculation of minority concentration. Therefore, any census tract in the County where the rate of minority persons exceeds 17.6% and where the rate of Hispanic persons exceeds 8% would be categorized as areas of concentrations of minority or ethnic residents.

There are no areas outside the cities of Allentown and Bethlehem that had areas with a racial concentration. There are 8 areas of ethnic concentration outside the cities where the block group has more than 8% Hispanic persons.

Table 25, Population by Race, found on the next page, shows the census tracts and communities where the rates of racial and ethnic minorities exceeded the rate for the Lehigh Valley as a whole. Those areas are shaded in the following table.

Table 25
Population by Race, 2010

Municipality	Census Tract	Total Population	White	%	Black/ African American	%	American Indian/ Alaska Native	%	Asian/ Pacific Islander	%	Other/ Two or more races	%	Hispanic/ Latino *	%
Allentown	1.01	3,661	2,531	69.1%	341	9.3%	11	0.3%	137	3.7%	641	17.5%	1,052	28.7%
	1.02	4,150	2,838	68.4%	391	9.4%	12	0.3%	80	1.9%	829	20.0%	1,247	30.0%
	4	3,548	2,005	56.5%	314	8.9%	22	0.6%	68	1.9%	1,139	32.1%	1,688	47.6%
	5	2,646	1,069	40.4%	508	19.2%	14	0.5%	32	1.2%	1,023	38.7%	1,759	66.5%
	6	6,243	3,687	59.1%	714	11.4%	21	0.3%	186	3.0%	1,635	26.2%	2,982	47.8%
	7	4,056	1,724	42.5%	602	14.8%	87	2.1%	69	1.7%	1,574	38.8%	2,671	65.9%
	8	4,083	1,559	38.2%	682	16.7%	62	1.5%	84	2.1%	1,696	41.5%	2,617	64.1%
	9	1,852	672	36.3%	368	19.9%	30	1.6%	42	2.3%	740	40.0%	1,213	65.5%
	10	3,151	1,229	39.0%	541	17.2%	77	2.4%	64	2.0%	1,240	39.4%	2,105	66.8%
	12	2,463	1,009	41.0%	587	23.8%	10	0.4%	18	0.7%	839	34.1%	1,091	44.3%
	14.01	7,226	4,410	61.0%	925	12.8%	32	0.4%	190	2.6%	1,669	23.1%	2,947	40.8%
	14.02	2,143	1,810	84.5%	106	4.9%	8	0.4%	41	1.9%	178	8.3%	373	17.4%
	15.01	6,625	3,499	52.8%	768	11.6%	35	0.5%	176	2.7%	2,147	32.4%	3,425	51.7%
	15.02	6,612	4,620	69.9%	689	10.4%	16	0.2%	208	3.1%	1,079	16.3%	1,844	27.9%
	16	3,822	1,532	40.1%	629	16.5%	88	2.3%	36	0.9%	1,537	40.2%	2,535	66.3%
	17	4,872	2,060	42.3%	754	15.5%	42	0.9%	58	1.2%	1,958	40.2%	3,228	66.3%
	18	4,621	1,989	43.0%	844	18.3%	33	0.7%	42	0.9%	1,713	37.1%	2,670	57.8%
	19	4,459	2,749	61.7%	496	11.1%	35	0.8%	79	1.8%	1,100	24.7%	1,625	36.4%
	20	5,151	2,478	48.1%	912	17.7%	42	0.8%	58	1.1%	1,661	32.2%	2,722	52.8%
	21	7,023	3,923	55.9%	970	13.8%	86	1.2%	149	2.1%	1,895	27.0%	3,119	44.4%
	22.01	4,379	3,580	81.8%	292	6.7%	25	0.6%	59	1.3%	423	9.7%	720	16.4%
	22.02	4,183	3,551	84.9%	260	6.2%	15	0.4%	56	1.3%	301	7.2%	532	12.7%
	23.01	7,134	6,009	84.2%	304	4.3%	11	0.2%	475	6.7%	335	4.7%	572	8.0%
	23.02	3,034	2,624	86.5%	180	5.9%	3	0.1%	57	1.9%	170	5.6%	293	9.7%
Slatington	51	4,232	3,981	94.1%	68	1.6%	17	0.4%	22	0.5%	144	3.4%	221	5.2%
Washington Twp.	52	6,624	6,490	98.0%	26	0.4%	14	0.2%	24	0.4%	70	1.1%	121	1.8%
Heidelberg Twp.	53.01	3,416	3,313	97.0%	13	0.4%	8	0.2%	25	0.7%	57	1.7%	82	2.4%
Lynn Twp.	53.02	4,229	4,107	97.1%	25	0.6%	10	0.2%	20	0.5%	67	1.6%	118	2.8%
Lowhill Twp.	54.01	2,173	2,106	96.9%	17	0.8%	1	0.0%	15	0.7%	34	1.6%	29	1.3%
Weisenberg Twp.	54.02	4,923	4,797	97.4%	24	0.5%	6	0.1%	32	0.7%	64	1.3%	119	2.4%
North Whitehall Twp.	55.03	4,092	3,926	95.9%	43	1.1%	3	0.1%	48	1.2%	72	1.8%	119	2.9%
	55.04	4,556	4,314	94.7%	53	1.2%	6	0.1%	65	1.4%	118	2.6%	178	3.9%
	55.05	3,261	3,155	96.7%	29	0.9%	2	0.1%	34	1.0%	41	1.3%	80	2.5%
	55.06	3,794	3,478	91.7%	115	3.0%	8	0.2%	66	1.7%	127	3.3%	203	5.4%
Whitehall Twp.	56.01	4,912	4,527	92.2%	90	1.8%	2	0.0%	103	2.1%	190	3.9%	240	4.9%
	56.02	5,170	4,746	91.8%	143	2.8%	10	0.2%	73	1.4%	198	3.8%	355	6.9%
	57.02	4,488	4,019	89.5%	132	2.9%	5	0.1%	107	2.4%	225	5.0%	399	8.9%
	57.03	3,440	2,301	66.9%	451	13.1%	29	0.8%	95	2.8%	564	16.4%	799	23.2%
	57.04	3,201	2,130	66.5%	396	12.4%	16	0.5%	332	10.4%	327	10.2%	495	15.5%
	57.05	5,527	4,439	80.3%	318	5.8%	16	0.3%	403	7.3%	351	6.4%	564	10.2%
Coplay	58	3,192	2,953	92.5%	84	2.6%	9	0.3%	33	1.0%	113	3.5%	202	6.3%
Catasauqua	59.01	6,436	5,726	89.0%	192	3.0%	6	0.1%	47	0.7%	465	7.2%	673	10.5%
Hanover Twp.	59.02	1,571	1,237	78.7%	120	7.6%	1	0.1%	78	5.0%	135	8.6%	230	14.6%
South Whitehall Twp.	60.01	4,529	4,194	92.6%	102	2.3%	4	0.1%	93	2.1%	136	3.0%	192	4.2%
	60.02	5,778	5,090	88.1%	180	3.1%	10	0.2%	379	6.6%	119	2.1%	246	4.3%
	61.01	3,688	3,405	92.3%	103	2.8%	1	0.0%	112	3.0%	67	1.8%	196	5.3%
	61.02	5,185	4,532	87.4%	154	3.0%	2	0.0%	320	6.2%	177	3.4%	262	5.1%

COUNTY OF LEHIGH

Population by Race (continued)

Municipality	Census Tract	Total Population	White	%	Black/ African American	%	American Indian/ Alaska Native	%	Asian/ Pacific Islander	%	Other/ Two or more races	%	Hispanic/ Latino *	%
Upper Macungie Twp.	62.02	8,616	7,191	83.5%	330	3.8%	20	0.2%	765	8.9%	310	3.6%	511	5.9%
	62.03	7,329	6,256	85.4%	155	2.1%	8	0.1%	675	9.2%	235	3.2%	377	5.1%
	62.04	4,118	3,604	87.5%	54	1.3%	1	0.0%	364	8.8%	95	2.3%	100	2.4%
Alburtis	63.02	6,899	5,820	84.4%	411	6.0%	8	0.1%	315	4.6%	345	5.0%	489	7.1%
Macungie	63.03	3,074	2,830	92.1%	55	1.8%	5	0.2%	56	1.8%	128	4.2%	160	5.2%
Lower Macungie Twp.	63.04	3,946	3,526	89.4%	70	1.8%	9	0.2%	229	5.8%	112	2.8%	188	4.8%
	63.05	6,617	5,868	88.7%	198	3.0%	7	0.1%	335	5.1%	209	3.2%	317	4.8%
	63.07	8,327	7,407	89.0%	197	2.4%	5	0.1%	496	6.0%	222	2.7%	363	4.4%
	63.08	7,205	6,348	88.1%	173	2.4%	14	0.2%	487	6.8%	183	2.5%	319	4.4%
Upper Milford Twp.	64.01	2,789	2,672	95.8%	28	1.0%	4	0.1%	34	1.2%	51	1.8%	83	3.0%
	64.02	4,792	4,628	96.6%	16	0.3%	5	0.1%	69	1.4%	74	1.5%	89	1.9%
Emmaus	65	5,626	5,175	92.0%	112	2.0%	17	0.3%	85	1.5%	237	4.2%	327	5.8%
	66	5,296	5,040	95.2%	47	0.9%	3	0.1%	72	1.4%	134	2.5%	198	3.7%
Salisbury Twp.	67.01	4,917	4,360	88.7%	182	3.7%	4	0.1%	42	0.9%	329	6.7%	542	11.0%
	67.02	2,793	2,625	94.0%	47	1.7%	0	0.0%	35	1.3%	86	3.1%	173	6.2%
	67.03	5,795	5,357	92.4%	167	2.9%	0	0.0%	142	2.5%	129	2.2%	188	3.2%
Fountain Hill	68	4,597	3,740	81.4%	302	6.6%	6	0.1%	38	0.8%	511	11.1%	1,033	22.5%
Coopersburg	69.02	2,386	2,284	95.7%	14	0.6%	3	0.1%	28	1.2%	57	2.4%	84	3.5%
Upper Saucon Twp.	69.03	6,395	5,988	93.6%	67	1.0%	7	0.1%	203	3.2%	130	2.0%	243	3.8%
	69.05	4,447	4,165	93.7%	65	1.5%	4	0.1%	140	3.1%	73	1.6%	123	2.8%
	69.06	3,966	3,700	93.3%	50	1.3%	4	0.1%	159	4.0%	53	1.3%	100	2.5%
Lower Milford Twp.	70	3,775	3,663	97.0%	16	0.4%	11	0.3%	35	0.9%	50	1.3%	52	1.4%
Bethlehem	91	3,717	3,227	86.8%	155	4.2%	9	0.2%	129	3.5%	197	5.3%	361	9.7%
	92	3,768	3,259	86.5%	182	4.8%	5	0.1%	142	3.8%	180	4.8%	311	8.3%
	93	3,246	2,835	87.3%	130	4.0%	7	0.2%	38	1.2%	236	7.3%	411	12.7%
	94	3,972	3,004	75.6%	283	7.1%	19	0.5%	39	1.0%	627	15.8%	1,001	25.2%
	95	4,640	3,687	79.5%	244	5.3%	15	0.3%	98	2.1%	596	12.8%	888	19.1%
	96	7,344	4,361	59.4%	882	12.0%	51	0.7%	115	1.6%	1935	26.3%	3,448	46.9%
	97	3,551	1,543	43.5%	753	21.2%	25	0.7%	18	0.5%	1212	34.1%	1,983	55.8%
Total:		349,497	276,286	79.1%	21,440	6.1%	1,279	0.4%	10,373	3.0%	40,119	11.5%	20,585	5.9%

Source: U.S. Census Bureau, 2010 SF 3, P3 & P4

*Hispanic is counted separately from Race.

Areas of concentrations of minority and ethnic residents generally are a concern when these same geographic areas are also noted to be areas of disproportionate need and contain a disproportionately higher rate of other characteristics such as low-income persons, low homeownership rates, vacant and/or substandard housing units, and unemployed or underemployed persons.

Areas of Concentrations of Low and Moderate Income Persons

The median income for a family of four residing in Lehigh County, as reported in the 2000 Census, was \$43,449. In 2012 the median family income (MFI) was \$73,300, as reported by HUD. The median family income (MFI) is the income amount that falls in the middle of the population, i.e., 50% of all families had incomes higher than this amount, and 50% had incomes lower than this amount.

According to HUD, family income levels can be categorized as extremely low (0-30% of MFI), very low (31-50% of MFI), low (51-80% of MFI), moderate (81-95% of MFI), middle (95-115% of MFI) and high (above 115% of MFI). In Lehigh County, these categories were associated with the following median family income (MFI) dollar ranges for a family of four persons for FY 2012 (Source: U.S. Department of Housing and Urban Development):

- Extremely Low-income: Up to \$22,000
- Very Low-income: \$22,001 to \$39,600
- Low-income: \$39,601 to \$63,350
- Moderate Income: \$63,351 to \$75,240

- Middle Income: \$75,241 to \$91,800
- High Income: \$91,801 and higher.

For the purposes of the Five-Year Strategic Plan and the associated HUD entitlement programs, emphasis is placed on those families earning 80% or less of the median family income (MFI). In Lehigh County, the overall percentage of low and moderate (LMI) income persons was 31.6% in 2012, while the First Quartile Low/Mod rate was 42.41%. A total of 39 census tract block groups across the County had a low/mod rate greater than the First Quartile Low/Mod rate of 42.41% as shown in shading on Table 26 on the following three pages, and depicted on the map on page 72.

These block groups are located in:

- Slatington, overall 51.6% low-mod
- Washington Township, one block group that is low-mod
- Whitehall, three tracts that are low-mod income
- Coplay, two block groups that are low-mod
- Catasauqua, overall 44.4% low-mod
- Hanover Township, overall 52.5% low-mod
- South Whitehall Township, two block groups that are low-mod
- Emmaus, one tract which is overall low-mod
- Salisbury Township, two block groups that are low-mod
- Fountain Hill, three block groups that are low-mod
- Coopersburg, one block group that is low-mod
- Lower Macungie Township, one block group that is low-mod

Table 26
Areas of Concentrations of Low and Moderate Income Persons
by Census Tract Block Group, 2012

Municipality	CT	BG	Low/Mod Persons	Total Persons	% Low/Mod
Slatington	51	1	459	1,229	37.3%
		2	946	1,613	58.6%
		3	274	638	42.9%
		4	584	902	64.7%
		Total	2,263	4,382	51.6%
Washington Twp.	52	1	316	1,086	29.1%
		2	327	1,092	29.9%
		3	407	763	53.3%
		4	402	1,732	23.2%
		5	264	641	41.2%
		6	488	1,274	38.3%
		Total	2,204	6,588	33.5%
Heidelberg Twp.	53	1	368	986	37.3%
		2	253	1,171	21.6%
		3	415	1,278	32.5%
		Total	1,036	3,435	30.2%
Lynn Twp.		4	333	1,005	33.1%
		5	306	1,029	29.7%
		6	550	1,639	33.6%
		Total	1,189	3,673	32.4%
Lowhill Twp.	54	1	207	843	24.6%
		2	244	1,026	23.8%
		Total	451	1,869	24.1%
Weisenberg Twp.		3	485	2,527	19.2%
		4	431	1,591	27.1%
		Total	916	4,118	22.2%
North Whitehall Twp.	55.01	1	547	1,484	36.9%
		2	678	3,449	19.7%
		3	252	1,256	20.1%
		4	503	1,650	30.5%
		Total	1,980	7,839	25.3%
	55.02	1	485	3,157	15.4%
		2	513	1,385	37.0%
		3	591	2,025	29.2%
		Total	1,589	6,567	24.2%
Whitehall Twp.	56.01	1	398	1,446	27.5%
		2	356	930	38.3%
		3	653	1,471	44.4%
		4	323	673	48.0%
		Total	1,730	4,520	38.3%
	56.02	1	291	1,045	27.8%
		2	613	1,838	33.4%
		3	316	647	48.8%
		4	853	1,661	51.4%
		Total	2,073	5,191	39.9%
	57.01	1	434	1,402	31.0%
		2	405	1,314	30.8%
		3	421	1,545	27.2%
		4	801	3,121	25.7%
		Total	2,061	7,382	27.9%
	57.02	1	670	1,574	42.6%
		2	324	764	42.4%
		3	807	1,671	48.3%
		Total	1,801	4,009	44.9%
	57.03	1	568	1,105	51.4%
		2	689	1,197	57.6%
		3	578	1,195	48.4%
		Total	1,835	3,497	52.5%

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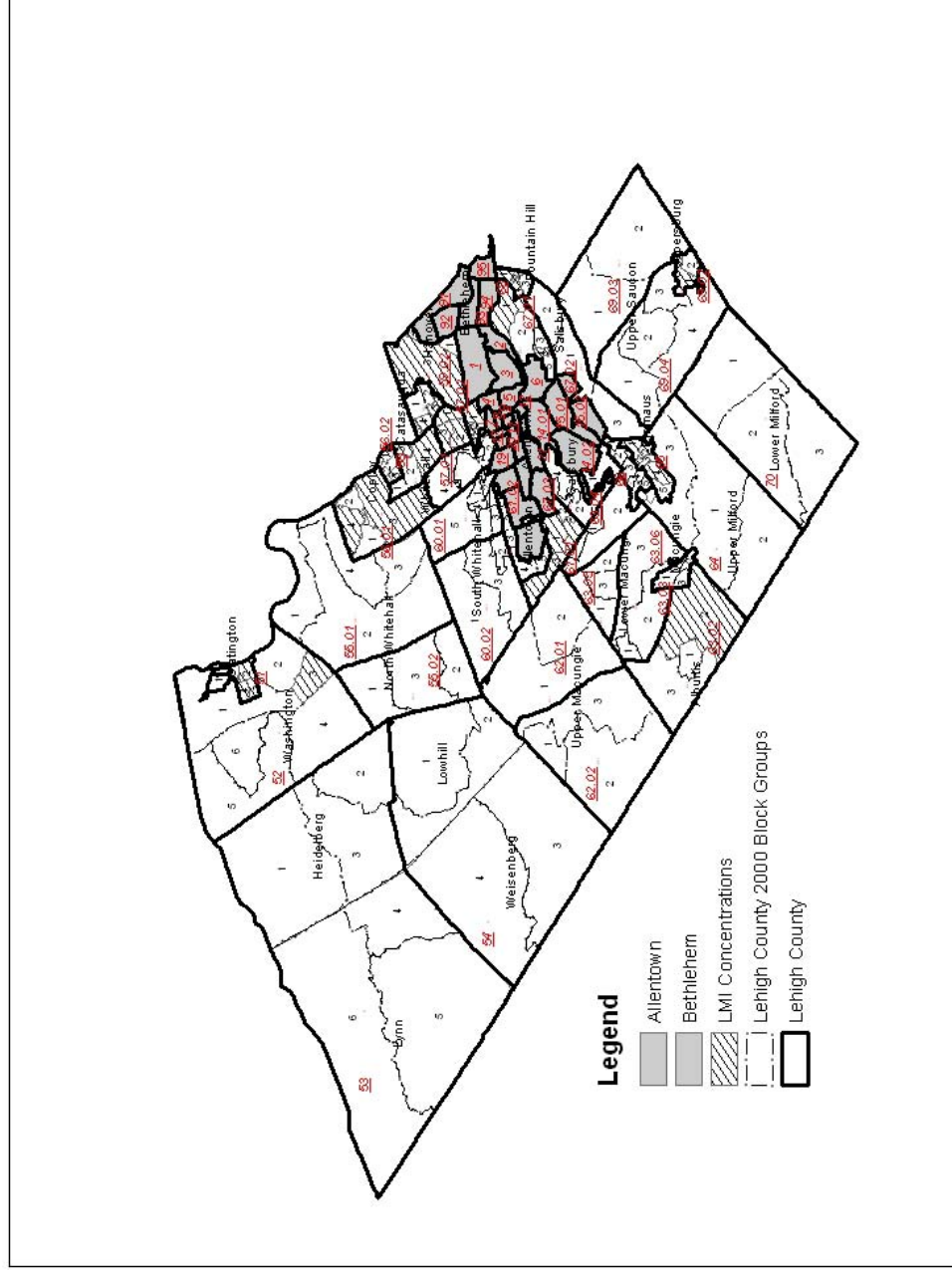
Municipality	CT	BG	Low/Mod Persons	Total Persons	% Low/Mod
Coplay	58	1	727	1,286	56.5%
		2	463	1,268	36.5%
		3	356	801	44.4%
		Total	1,546	3,355	46.1%
Catasauqua	59.01	1	619	2,042	30.3%
		2	549	1,517	36.2%
		3	285	628	45.4%
		4	944	1,556	60.7%
		5	418	789	53.0%
		Total	2,815	6,532	43.1%
Hanover Twp.	59.02	1	206	489	42.1%
		2	406	635	63.9%
		3	392	789	49.7%
		Total	1,004	1,913	52.5%
South Whitehall Twp.	60.01	1	301	908	33.1%
		2	476	1,242	38.3%
		3	409	1,052	38.9%
		4	274	832	32.9%
		5	167	579	28.8%
		Total	1,627	4,613	35.3%
	60.02	1	484	1,476	32.8%
		2	293	2,248	13.0%
		3	299	1,375	21.7%
		Total	1,076	5,099	21.1%
	61.01	1	430	1,014	42.4%
		2	131	582	22.5%
		3	596	1,387	43.0%
		Total	1,157	2,983	38.8%
	61.02	1	274	680	40.3%
		2	200	679	29.5%
		3	160	890	18.0%
		4	98	772	12.7%
		5	298	1,265	23.6%
		Total	1,030	4,286	24.0%
Upper Macungie Twp.	62.01	1	515	3,265	15.8%
		2	1,157	5,677	20.4%
		Total	1,672	8,942	18.7%
	62.02	1	159	967	16.4%
		2	345	1,018	33.9%
		3	973	2,644	36.8%
		Total	1,477	4,629	31.9%
Alburtis	63.02	1	698	2,117	33.0%
		Total	698	2,117	33.0%
Macungie	63.03	1	307	1,335	23.0%
		2	211	610	34.6%
		3	411	1,094	37.6%
		Total	929	3,039	30.6%
Lower Macungie Twp.	63.04	1	144	754	19.1%
		2	382	2,909	13.1%
		Total	526	3,663	14.4%
	63.05	1	404	1,408	28.7%
		2	269	1,645	16.4%
		3	510	2,423	21.0%
		Total	1,183	5,476	21.6%
	63.06	1	299	1,420	21.1%
		2	791	3,356	23.6%
		3	642	3,533	18.2%
		Total	1,732	8,309	20.8%
Upper Milford Twp.	64	1	578	2,881	20.1%
		2	272	1,547	17.6%
		3	524	1,793	29.2%
		Total	1,374	6,221	22.1%

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Municipality	CT	BG	Low/Mod Persons	Total Persons	% Low/Mod	
Emmaus	64	3	131	303	43.2%	
	65	1	480	978	49.1%	
		2	830	1,381	60.1%	
		3	462	1,195	38.7%	
		4	564	1,305	43.2%	
		5	207	717	28.9%	
		Total	2,543	5,576	45.6%	
	66	1	234	733	31.9%	
		2	229	806	28.4%	
		3	391	1,439	27.2%	
		4	183	942	19.4%	
		5	470	1,433	32.8%	
		Total	1,507	5,353	28.2%	
Salisbury Twp.	67.01	1	356	792	44.9%	
		2	282	904	31.2%	
		3	451	1,338	33.7%	
		4	363	713	50.9%	
		5	347	919	37.8%	
		Total	1,799	4,666	38.6%	
	67.02	1	385	1,265	30.4%	
		2	434	1,034	42.0%	
		3	84	451	18.6%	
		Total	903	2,750	32.8%	
	67.03	1	513	2,133	24.1%	
		2	288	883	32.6%	
		3	229	1,292	17.7%	
4		168	1,342	12.5%		
Total	1,198	5,650	21.2%			
Fountain Hill	68	1	613	1,232	49.8%	
		2	448	1,034	43.3%	
		3	310	1,126	27.5%	
		4	466	960	48.5%	
		Total	1,837	4,352	42.2%	
Coopersburg	69.02	1	464	1,512	30.7%	
		2	490	903	54.3%	
		Total	954	2,415	39.5%	
Upper Saucon Twp.	69.03	1	482	1,769	27.2%	
		2	578	2,414	23.9%	
		Total	1,060	4,183	25.3%	
	69.04	1	300	1,173	25.6%	
		2	355	2,051	17.3%	
		3	152	1,042	14.6%	
		4	420	2,607	16.1%	
Total	1,227	6,873	17.9%			
Lower Milford Twp.	70	1	489	2,179	22.4%	
		2	197	693	28.4%	
		3	139	745	18.7%	
		Total	825	3,617	22.8%	
Lower Macungie Twp.	63.02	2	273	632	43.2%	
		3	227	892	25.4%	
		Total	500	1,524	32.8%	
		1	144	754	19.1%	
	63.04	2	382	2,909	13.1%	
		Total	526	3,663	14.4%	
		63.05	1	404	1,408	28.7%
			2	269	1,645	16.4%
	3		510	2,423	21.0%	
	Total		1,183	5,476	21.6%	
	63.06	1	299	1,420	21.1%	
		2	791	3,356	23.6%	
		3	642	3,533	18.2%	
Total		1,732	8,309	20.8%		
	Lehigh County				31.6%	
Source: U.S. Department of Housing and Urban Development 2012						

Source: U.S. Department of Housing and Urban Development 2012

Lehigh County Low Moderate Income Concentrations, 2012



Of particular interest are those census tracts where the percentage of LMI persons is greater than 42.41% and there are identified areas of concentrations of racial and ethnic minority households. The census tracts with concentrations of income and race and/or ethnicity are highlighted on Table 27 on the following page. Where income, race or ethnicity is considered concentrated, the figure is also highlighted.

Table 27
Areas of Concentrations of Low and Moderate Income Persons
and Racial and Ethnic Minorities by Census Tract, 2000 and 2010

2000		2010				
Census Tracts	% low/mod	Census Tracts	Black/ African American	Asian/ Pacific Islander	Other/ Two or more races	Hispanic/ Latino
51	51.6%	51	1.6%	0.5%	3.4%	5.2%
52	33.5%	52	0.4%	0.4%	1.1%	1.8%
53	31.3%	53.01	0.4%	0.7%	1.7%	2.4%
		53.02	0.6%	0.5%	1.6%	2.8%
54	22.8%	54.01	0.8%	0.7%	1.6%	1.3%
		54.02	0.5%	0.7%	1.3%	2.4%
55.01	25.3%	55.03	1.1%	1.2%	1.8%	2.9%
		55.04	1.2%	1.4%	2.6%	3.9%
55.02	24.2%	55.05	0.9%	1.0%	1.3%	2.5%
		55.06	3.0%	1.7%	3.3%	5.4%
56.01	38.3%	56.01	1.8%	2.1%	3.9%	4.9%
56.02	39.9%	56.02	2.8%	1.4%	3.8%	6.9%
57.01	27.9%	57.05	2.9%	2.4%	5.0%	8.9%
57.02	44.9%	57.02	13.1%	2.8%	16.4%	23.2%
57.03	52.5%	57.03	12.4%	10.4%	10.2%	15.5%
		57.04	5.8%	7.3%	6.4%	10.2%
58	46.1%	58	2.6%	1.0%	3.5%	6.3%
59.01	43.1%	59.01	3.0%	0.7%	7.2%	10.5%
59.02	52.5%	59.02	7.6%	5.0%	8.6%	14.6%
60.01	35.3%	60.01	2.3%	2.1%	3.0%	4.2%
60.02	21.1%	60.02	3.1%	6.6%	2.1%	4.3%
61.01	38.3%	61.01	2.8%	3.0%	1.8%	5.3%
61.02	24.0%	61.02	3.0%	6.2%	3.4%	5.1%
62.01	18.7%	62.02	3.8%	8.9%	3.6%	5.9%
62.02	31.9%	62.03	2.1%	9.2%	3.2%	5.1%
		62.04	1.3%	8.8%	2.3%	2.4%
63.02	33.0%	63.02	6.0%	4.6%	5.0%	7.1%
63.03	30.6%	63.03	1.8%	1.8%	4.2%	5.2%
63.04	14.4%	63.04	1.8%	5.8%	2.8%	4.8%
63.05	21.1%	63.05	3.0%	5.1%	3.2%	4.8%
63.06	20.8%	63.07	2.4%	6.0%	2.7%	4.4%
		63.08	2.4%	6.8%	2.5%	4.4%
64	22.3%	64.01	1.0%	1.2%	1.8%	3.0%
		64.02	0.3%	1.4%	1.5%	1.9%
65	45.6%	65	2.0%	1.5%	4.2%	5.8%
66	28.2%	66	0.9%	1.4%	2.5%	3.7%
67.01	38.6%	67.01	3.7%	0.9%	6.7%	11.0%
67.02	32.8%	67.02	1.7%	1.3%	3.1%	6.2%
67.03	21.2%	67.03	2.9%	2.5%	2.2%	3.2%
68	42.2%	68	6.6%	0.8%	11.1%	22.5%
69.02	39.5%	69.02	0.6%	1.2%	2.4%	3.5%
69.03	25.3%	69.03	1.0%	3.2%	2.0%	3.8%
69.04	17.9%	69.05	1.5%	3.1%	1.6%	2.8%
		69.06	1.3%	4.0%	1.3%	2.5%
70	22.8%	70	0.4%	0.9%	1.3%	1.4%
Total	42.4%*					

*U.S. Department of Housing and Urban Development, Upper Quartile Low -Mod Income (42.41%)

Source: U.S. Census Bureau; U.S. Department of Housing and Urban Development

COUNTY OF LEHIGH

There are a total of four census tracts in Lehigh County (not including Allentown and Bethlehem) that can be characterized as having concentrations of both income and race/ethnicity. Areas in the county where the rate of low and moderate income persons exceeds 42.41% and the rate of racial minorities is greater than the Lehigh Valley's rate overall include block groups in Whitehall Township, Catasauqua Borough and Hanover Township.

21. If applicable, identify the census tracts for Neighborhood Revitalization Strategy Areas and/or any local targeted areas.

Lehigh County has not established any Neighborhood Revitalization Strategy Area nor targeted funds to specific areas.

22. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) and the basis for assigning the priority (including the relative priority, where required) given to each category of priority needs (91.215(a)(2)).

Lehigh County will provide CDBG funds to activities serving the participating jurisdictions of the Urban County. As such, assistance is not directed to any specific geographic area. Funds are awarded competitively using the criteria identified below.

CDBG funds are intended to provide low- and moderate-income households with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration.

The system for establishing the priority of projects is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG program;
- Meeting the needs of very-low, low- and moderate-income residents;
- Focusing on low- and moderate-income areas or neighborhoods;
- Coordinating and leveraging of resources;
- Response to expressed needs;
- Projects that would otherwise cause a special assessment to be levied against low and moderate income households; and
- Ability to complete the project in a timely manner.

23. If appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to Neighborhood Revitalization Strategy Areas and/or any local targeted areas.

Not applicable

24. Identify any obstacles to meeting underserved needs.

The primary obstacle to meeting underserved needs is the limited resources available to address the identified priorities. Lehigh County will partner with other agencies when feasible to leverage resources and maximize outcomes in housing and community development.

The County is a large geographic unit. The ability to reach out to communities over the large geographic area is limited. Through partnerships with local municipalities and non-profit human service agencies, the County programs can affect the communities where lower income people live.

SPECIFIC OBJECTIVES 91.215 (a) (4)

25. Summarize priorities and specific objectives the jurisdiction intends to initiate and/or complete in accordance with the tables* prescribed by HUD. Outcomes must be categorized as providing either new or improved availability/accessibility, affordability, or sustainability of decent housing, a suitable living environment, and economic opportunity.

Goals and objectives to be carried out during the strategic plan period are indicated by placing a check in the following boxes

<input checked="" type="checkbox"/>	Objective Category Decent Housing Which includes:	<input checked="" type="checkbox"/>	Objective Category: Suitable Living Environment Which includes:	<input checked="" type="checkbox"/>	Objective Category: Expanded Economic Opportunities Which includes:
<input checked="" type="checkbox"/>	assisting homeless persons obtain affordable housing	<input checked="" type="checkbox"/>	improving the safety and livability of neighborhoods	<input checked="" type="checkbox"/>	job creation and retention
<input checked="" type="checkbox"/>	assisting persons at risk of becoming homeless	<input checked="" type="checkbox"/>	eliminating blighting influences and the deterioration of property and facilities	<input checked="" type="checkbox"/>	establishment, stabilization and expansion of small business (including micro-businesses)
<input checked="" type="checkbox"/>	retaining the affordable housing stock	<input checked="" type="checkbox"/>	increasing the access to quality public and private facilities	<input checked="" type="checkbox"/>	the provision of public services concerned with employment
<input checked="" type="checkbox"/>	increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged minorities without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability	<input checked="" type="checkbox"/>	reducing the isolation of income groups within areas through spatial deconcentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods	<input checked="" type="checkbox"/>	the provision of jobs to low-income persons living in areas affected by those programs and activities under programs covered by the plan
<input checked="" type="checkbox"/>	increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/AIDS) to live in dignity and independence	<input type="checkbox"/>	restoring and preserving properties of special historic, architectural, or aesthetic value	<input checked="" type="checkbox"/>	availability of mortgage financing for low-income persons at reasonable rates using non-discriminatory lending practices
<input type="checkbox"/>	providing affordable housing that is accessible to job opportunities	<input type="checkbox"/>	conserving energy resources and use of renewable energy sources	<input checked="" type="checkbox"/>	access to capital and credit for development activities that promote the long-term economic social viability of the community

Identify specific objectives and proposed outcomes by completing Table 1C or 2C – Summary of Specific Objectives

The inability to clearly demonstrate program results at a national level is having serious consequences on program budgets. In response, HUD has developed an outcomes performance measurement system to collect information on outcomes of activities and to aggregate that information at the local and national level.

The outcomes that HUD is tracking include:

- **Availability/accessibility**
Availability is related to making services, infrastructure, housing, or shelter available or accessible to individual residents/beneficiaries.
- **Affordability**
Affordability may include the creation or maintenance of affordable housing, basic infrastructure hook-ups or services such as transportation or day care.
- **Sustainability: Promoting livable or viable communities**
Sustainability is specifically tied to activities that are meant to ensure that a particular geographic area as a whole (neighborhood, downtown, etc) remains viable. It is targeted at supporting a specific physical location.

Each outcome is paired with an objective:

- **Create a suitable living environment**
This objective relates to activities that are intended to address a wide range of issues faced by low- and moderate-income persons, from physical problems with their environment, such as poor quality infrastructure, to social issues such as crime prevention, literacy or elderly health services.
- **Provide decent affordable housing**
This objective focuses on housing programs where the purpose of the program is to meet individual family or community needs and not programs where housing is an element of a larger effort since they would be more appropriately reported under suitable living environment.
- **Create economic opportunities**
This objective applies to the types of activities related to economic development, commercial revitalization or job creation.

The objectives, outcomes, and output indicators will be combined to produce outcome narratives that will be comprehensive and will demonstrate the benefits that result from the expenditure of these federal funds.

HUD Specific Objectives Matrix

	Availability/ Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

Table 1C

Grantee Name: Lehigh County, Pennsylvania

Obj #	Specific Objectives	Sources of Funds	Year	Performance Indicators	Expected Number	Actual Number	Accomplishment
Availability of Decent Housing (DH-1)							
DH1.1	Development of Affordable housing	LIHTC AHTF	2012	New units	0		%
			2013				%
			2014				%
			2015				%
			2016				%
			MULTI-YEAR GOAL		110 units		%
Affordability of Decent Housing (DH-2)							
DH2.1	Improve housing conditions in county - homeowner	CDBG HOME	2012	Units	10		%
			2013				%
			2014				%
			2015				%
			2016				%
			MULTI-YEAR GOAL		50 units		%
DH 2.2	Improve housing conditions in county – renter	CDBG LCHA	2012	Units	30		%
			2013				%
			2014				%
			2015				%
			2016				%
			MULTI-YEAR GOAL		150 units		
DH 2.3	Homebuyer Assistance	CDBG	2012	Households	5		%
			2013				%
			2014				%
			2015				%
			2016				%
			MULTI-YEAR GOAL		20 hhds.		%

HOUSING

PRIORITY HOUSING NEEDS 91.215 (b)

26. Describe the relationship between the allocation priorities and the extent of need given to each category specified in the Housing Needs Table (Table 2A or Needs.xls). These categories correspond with special tabulations of U.S. census data provided by HUD for the preparation of the Consolidated Plan.

The need for housing assistance for each type of household will inform the allocation priorities. Lehigh County assigned priorities for housing needs based on the information provided in the housing needs section.

Priority housing needs and activities

	0-30% MFI		31-50% MFI		51-80% MFI	
	Renters	Owners	Renters	Owners	Renters	Owners
ELDERLY						
Any Housing Problem	High	High	Medium	Medium	Medium	Medium
Cost Burden >30%	High	High	Medium	Medium	Medium	Medium
Cost Burden >50%	Medium	Medium	Low	Low	Low	Medium
SMALL RELATED						
Any Housing Problem	High	High	High	High	Medium	Medium
Cost Burden >30%	High	High	High	High	Medium	Medium
Cost Burden >50%	Medium	High	Low	Medium	Low	Low
LARGE RELATED						
Any Housing Problem	High	High	High	High	Medium	Medium
Cost Burden >30%	High	High	Medium	High	Low	Medium
Cost Burden >50%	Medium	High	Low	Low	Low	Low
ALL OTHER						
Any Housing Problem	High	High	High	High	Medium	Medium
Cost Burden >30%	High	High	High	High	Medium	Medium
Cost Burden >50%	Medium	High	Medium	Medium	Low	Low

Source: U.S. Department of Housing and Urban Development (HUD), State of the Cities Data Source

Highest Priority activities include eligible CDBG projects that will create an impact on the community. Projects that stimulate the redevelopment of the community, enhance the quality of life and expand housing choice will be considered high priority. High priority will be given to all family types and very low, low and moderate income levels. (See above table for specific categories.)

Medium Priority is given to projects for household types with incomes over 80% of median.

There were no housing needs assigned a low priority.

Housing funds will be allocated using the following strategies:

- A. **Maintain existing housing stock** — Rehabilitation assistance is needed for both owner and renter occupied housing
- B. **Develop affordable housing** — Housing to be developed by private investment and non-profit organizations
- C. **Homebuyer's assistance** — Down payment and closing cost assistance for low and moderate-income homebuyers

Analysis of the Characteristics of the Housing Market

Affordability

According to the data provided by HUD from the 2000 U.S. Census, of all low or moderate income residents in Lehigh County, over 52.9% of the renters and 46.8% of the owners were defined as having housing problems related to paying over 30% of their income to housing expenses.

Condition

Based on the housing element, over 60% of the housing stock in Lehigh County is over 40 years old.

Accessibility

There were 17,556 Lehigh County residents over the age of 65 who reported a disability on the 2010 census. The total number of citizens over the age of 65 is 48,559 persons. The elderly and disabled population in Lehigh County is expected to increase over time as the baby boomers enter into retirement age. The increase in this population sector will mean there will be more persons requiring housing that is adaptable to their physical needs over the next five years.

Basis for Assigning the Priority Given to Each Category of Priority Needs

The priorities presented were developed by:

- 1) Weighing the severity of the need among all groups and sub groups
- 2) Analyzing the current social, housing or economic conditions
- 3) Analyzing the relative needs of low and moderate income families
- 4) Assessing the resources likely to be available over the next five years.

The housing market in Lehigh County has become very expensive. The cost of housing has grown beyond the reach of the workforce and low-income households. Therefore, all efforts to expand housing choice and preserve the affordable units currently available for any category of family type and lower income level are high priority.

Table 2A
Priority Housing Needs/Investment Plan Goals

PRIORITY HOUSING NEEDS (households)		Priority		Annual Goal				
			5 yr. Goal	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5
Renter	Small Related	0-30%	150	30	30	30	30	30
		31-50%	0	0	0	0	0	0
		51-80%	0	0	0	0	0	0
	Large Related	0-30%	0	0	0	0	0	0
		31-50%	0	0	0	0	0	0
		51-80%	0	0	0	0	0	0
	Elderly	0-30%	100	20	20	20	20	20
		31-50%	100	20	20	20	20	20
		51-80%	0	0	0	0	0	0
	All Other	0-30%	0	0	0	0	0	0
		31-50%	0	0	0	0	0	0
		51-80%	0	0	0	0	0	0
Owner	Small Related	0-30%	2	0	1	1	0	0
		31-50%	13	3	3	3	2	2
		51-80%	18	7	3	2	3	3
	Large Related	0-30%	1	1	0	0	0	0
		31-50%	6	2	1	1	1	1
		51-80%	3	0	1	1	1	0
	Elderly	0-30%	5	0	1	1	2	1
		31-50%	10	3	2	2	2	1
		51-80%	5	1	1	1	1	1
	All Other	0-30%	0	0	0	0	0	0
		31-50%	5	1	1	1	1	1
		51-80%	12	2	3	3	2	2

Table 2A
Priority Housing Needs/Investment Plan Goals

Priority Need	5-Yr. Goal Plan/ Actual	Yr. 1 Goal Plan/ Actual	Yr. 2 Goal Plan/ Actual	Yr. 3 Goal Plan/ Actual	Yr. 4 Goal Plan/ Actual	Yr. 5 Goal Plan/ Actual
Renters						
0 - 30 of MFI	150	30	30	30	30	30
31 - 50% of MFI	0	0	0	0	0	0
51 - 80% of MFI	0	0	0	0	0	0
Owners						
0 - 30 of MFI	8	1	2	2	2	1
31 - 50 of MFI	34	9	7	7	6	5
51 - 80% of MFI	38	10	8	7	7	6
Homeless*						
Individuals	34	20	5	5	2	2
Families	0	0	0	0	0	0
Non-Homeless Special Needs						
Elderly	200	40	40	40	40	40
Frail Elderly	0	0	0	0	0	0
Severe Mental Illness	0	0	0	0	0	0
Physical Disability	0	0	0	0	0	0
Developmental Disability	0	0	0	0	0	0
Alcohol/Drug Abuse	0	0	0	0	0	0
HIV/AIDS	0	0	0	0	0	0
Victims of Domestic Violence	0	0	0	0	0	0
Total	464	110	92	90	87	87
Total Section 215	446	110	92	90	87	87
215 Renter	300	70	70	70	70	70
215 Owner	80	20	20	20	17	14

* Homeless individuals and families assisted with transitional and permanent housing

Table 2A
Priority Housing Activities

Priority Need	5-Yr. Goal Plan/ Actual	Yr. 1 Goal Plan/ Actual	Yr. 2 Goal Plan/ Actual	Yr. 3 Goal Plan/ Actual	Yr. 4 Goal Plan/ Actual	Yr. 5 Goal Plan/ Actual
CDBG						
Acquisition of existing rental units	0	0	0	0	0	0
Production of new rental units	100	0	0	0	100	0
Rehabilitation of existing rental units	150	30	30	30	30	30
Rental assistance	0	0	0	0	0	0
Acquisition of existing owner units	0	0	0	0	0	0
Production of new owner units	10	0	0	5	5	0
Rehabilitation of existing owner units	50	15	10	5	5	15
Homeownership assistance	20	5	4	4	4	3
HOME*						
Acquisition of existing rental units	0	0	0	0	0	0
Production of new rental units	0	0	0	0	0	0
Rehabilitation of existing rental units	15	5	10	0	0	0
Rental assistance	0	0	0	0	0	0
Acquisition of existing owner units	0	0	0	0	0	0
Production of new owner units	0	0	0	0	0	0
Rehabilitation of existing owner units	0	0	0	0	0	0
Homeownership assistance	0	0	0	0	0	0
HOPWA	Not applicable					
Rental assistance	0	0	0	0	0	0
Short term rent/mortgage utility payments	0	0	0	0	0	0
Facility based housing development	0	0	0	0	0	0
Facility based housing operations	0	0	0	0	0	0
Supportive services	0	0	0	0	0	0
Other						
NSP I – Rehabilitation of existing units	5	5	0	0	0	0
Act 137 – N.H.S. Downpayment and closing cost assistance	20	5	5	0	0	0
Rental – Capital Funds rehabilitation	50	50	0	0	0	0
HealthCHOICES – Rental assistance	15	2	4	4	2	1
McKinney CoC – Homeless Permanent Supportive Housing	34	20	4	5	3	2

*HOME funds are received from the Pennsylvania Department of Community and Economic Development.

27. Provide an analysis of how the characteristics of the housing market and the severity of housing problems and needs of each category of residents provided the basis for determining the relative priority of each priority housing need category, particularly among extremely low-income, low-income, and moderate-income households.

Note: Family and income types may be grouped in the case of closely related categories of residents where the analysis would apply to more than one family or income type.

The severity of the housing problems of the very poor (i.e., those with incomes under 30% of the median income), are the most difficult to address. The market analysis and identification of housing needs among income groups consistently shows that the very lowest income residents have the most difficulty with the cost and condition of housing. Priority will be given to addressing the housing needs of very low and low-income households as resources become available.

Lehigh County has very limited funds for housing activities. Since the County does not receive HOME funds, and Lehigh County provides funds to the local jurisdictions based on an annual competitive process, few dollars are allocated to housing.

The priorities for project selection include consideration of the severity of the problem at the local level, consistency with the Five-Year Strategic Plan goals and objectives, and whether funding the project will alleviate hardship that might be imposed if the local community were to undertake the project on its own and low-income households would have to pay a special assessment or bear other direct costs of the project.

28. Identify any obstacles to meeting underserved needs.

As in the last Five-Year Strategic Plan, the most difficult obstacle to meeting the needs of the underserved continues to be a considerable lack of public and private resources to fully address the priorities identified in this Five-Year Strategic Plan. Building the organizational infrastructure to undertake projects and programs that rehabilitate and expand the housing supply will also be challenging. In the Lehigh Valley Housing Needs Assessment, the findings indicated that:

- There are opportunities available for more collaborative initiatives between for-profit developers and nonprofit organizations in the Lehigh Valley. By partnering with an experienced for-profit developer, a smaller nonprofit can enhance its capacity in budgeting, planning, financing and construction management skills.
- There are also opportunities for public housing authorities to create new affordable housing.
- Developers identified the insufficient supply of land zoned for multi-family housing as one of the factors driving up the cost of land acquisition and development. Outreach

initiatives focused on educating public officials and planning commissions on the benefits of affordable housing may encourage the rezoning of more land to multi-family zoning designations, as well as eliminate unnecessary and excessive development standards for multi-family housing.

- Active and productive nonprofit housing developers need ready access to capital in order to finance the front-end soft costs associated with new development. Utilizing a less-restrictive source of financing for this (such as Act 137 Housing Trust Fund resources) would enable nonprofits to seek out more development opportunities and fully investigate the financial feasibility of potential projects early on.

Some of the market opportunities identified at this time include: low land costs, a large inventory of distressed properties, and a housing inventory shortage. Weaknesses identified include the difficulty builders have accessing capital since conventional lending practices have become more stringent, and the need for municipalities to have a process in place to cut costs for infrastructure by increasing density. One of the key goals has been to build the capacity of local non-profits to build more affordable housing.

SPECIFIC OBJECTIVES/AFFORDABLE HOUSING 91.215 (b)

Note: Specific affordable housing objectives must specify the number of extremely low-income, low-income, and moderate-income households to whom the jurisdiction will provide affordable housing as defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership. (24 CFR 91.215(b)(2))

29. Identify each specific housing objective by number (DH-1, DH-2, DH-3), proposed accomplishments and outcomes the jurisdiction hopes to achieve in quantitative terms over a specified time period, or in other measurable terms as identified and defined by the jurisdiction.

Complete and submit Table 1C Summary of Specific Objectives or, if using the CPMP Tool, the Summaries.xls file.

The County expects to focus federal CDBG funds toward housing and redevelopment of local communities. Table 2A in the previous section reflects the distribution of extremely low-income, low-income and moderate-income households for whom the County will provide affordable housing. These programs are summarized below. Table 1C, found on page 79, summarizes the priorities and objectives in terms of the federal objectives.

1. Priorities and Objectives

The goal of the County is to improve the quality of life in local municipalities for extremely low, low- and moderate-income residents, and to retain and increase the stock of affordable owner and renter housing units. With this in mind, the following objectives have been established:

DH 2.2 - Retain existing housing stock — rehabilitate and stabilize the housing stock of both owner and renter (LCHA) occupied housing.

The lack of employment has impacted homeowners with the result that many are unable to maintain their housing. The Countywide Housing Rehabilitation Program will be continued and, if additional funds are available, expanded. Homeowners facing foreclosure will have access to counseling services to prevent foreclosure whenever possible. Developers, both public and private, will be encouraged to rehabilitate existing affordable rental housing.

- Rehabilitate 50 owner-occupied housing units

Proposed Activities: Countywide Owner-Occupied Housing Rehabilitation Program

Description and Proposed Accomplishments - Owner-Occupied Rehabilitation: The County administers a Countywide Housing Rehabilitation Program that provides financial assistance to low- and moderate-income homeowners for the repair or rehabilitation of substandard housing to meet local building codes, and to ensure safe and sanitary living conditions.

Geographic Distribution: All funds will be distributed Countywide outside of the cities of Allentown and Bethlehem.

Proposed Activities: HOME-funded Housing Rehabilitation Program

Description and Proposed Accomplishments: The County has received HOME funds from the Commonwealth of Pennsylvania to provide homeowners in Catasauqua with rehabilitation assistance.

Geographic Distribution: Owner-occupied homes in Catasauqua are eligible for assistance

Proposed Activities: NSP I

Description and Proposed Accomplishments: The County has received NSP I funds from the Commonwealth of Pennsylvania to rehabilitate 11 homes in phase 1 and 3 homes in Phase 2.

Geographic Distribution: Homes are located in several municipalities in Lehigh and Northampton Counties.

- Encourage the rehabilitation of 150 rental units that are affordable to lower income households

Proposed Activities: Capital Fund Program

Description and Proposed Accomplishments: Rehabilitation and modernization of Lehigh County Housing Authority's public housing units and facilities.

Rehabilitation and modernization assistance for assisted rental housing will assist up to 150 households over the next Five-Years. Assisted households include elderly households, small households, large households, and all other households. Assisted households will be primarily extremely low-income.

Geographic Distribution: The Lehigh County Housing Authority has units in several communities throughout Lehigh County except Allentown and Bethlehem.

Proposed Activities: Foreclosure Prevention and Financial Literacy education, outreach and referral.

- Provide foreclosure mitigation counseling services to 150 households.

Description and Proposed Accomplishments: Affordable housing trust funds are provided to the Community Action Committee of the Lehigh Valley to provide financial literacy training and foreclosure prevention education, outreach and referral.

Geographic Distribution: The program is available Countywide

DH 2.1 - Development of affordable housing — provide financial and technical assistance for the development of new housing and rehabilitation of vacant housing to provide housing opportunities for very low-income and low-income renters and low-income to moderate income homebuyers.

Municipalities are increasingly impacted by the foreclosure crisis and burdened with vacant housing units. Abandoned units contribute to blight and reduce tax revenue. Developers and municipalities will be encouraged to create programs and utilize available legislative and financial tools to address these issues.

- Assist in the development of 10 owner occupied housing units.

Proposed Activities: Vacant Property Acquisition, Rehabilitation and Resale

Description and Proposed Accomplishments: The Community Land Trust (CLT) is administering the Neighborhood Stabilization Program (NSP) and has acquired properties for rehabilitation and resale. Using this model, the CLT will acquire and rehabilitate additional properties for resale to low and moderate income buyers. A variety of funding sources are being explored.

Geographic Distribution: The program will be available Countywide.

- Assist development of 100 rental units that are affordable to lower income households.

Proposed Activities: Housing Development

Description and Proposed Accomplishments: Lehigh County will continue to make funds available through the Affordable Housing Trust Fund and seek additional sources of funds to support the development of housing units that are affordable to lower income households.

To address unmet or overburdened needs, the County encourages rental projects that include the following:

- Those that provide project based rental assistance.
- Those serving the lowest income households.
- Set-asides for disabled households.
- Units with supportive services for seniors 75 and over.

Geographic Distribution: The development assistance will be available Countywide.

DH 2.3 - Homebuyer's assistance — provide access to down payment and closing cost assistance for low and moderate income homebuyers.

To help buyers purchase available units, assistance will be provided to close the gap between what households can afford and their limited cash resources. Counseling will be

provided along with financial assistance as such services have been shown to improve housing outcomes and stability.

- Assist 20 lower income households achieve homeownership.

Proposed Activities: Down payment and closing cost assistance (DH 2.3)

Description and Proposed Accomplishments: Affordable Housing Trust Funds have been allocated to Neighborhood Housing Services (NHS) to provide down payment and closing cost assistance. The benefit of this program is to expand housing choice by making homes affordable to lower income households.

Geographic Distribution: The homebuyer assistance is available Countywide

30. Describe how federal, state and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

The sources of funds that may be available to address each of the County's housing objectives is shown on the matrix on the following page:

Table 29
Resources Potentially Available for Housing Objectives

	Rehabilitation of Housing Stock	Development - Owner occupied	Development- Rental Properties	Homebuyer Assistance
CDBG	X	X		
HOME	X	X		X
Neighborhood Stabilization Program (NSP)				
Act 137 Affordable Housing Trust Fund	X	X	X	X
PHFA PennHOMES			X	
Low Income Housing Tax Credit (LIHTC)			X	
Renovate & Repair - PHFA	X			X
PA Department of Community and Economic Development	X	X	X	
Lehigh County Housing Authority - Section 8				X
Public Housing - Capital Fund Program	X			

Source: Mullin and Lonergan Associates, Inc., 2012

31. Indicate how the severity of housing problems and the needs of extremely low-income, low-income, moderate-income renters and owners, persons at risk of homelessness, and homeless persons identified in accordance with §91.205 provided the rationale for establishing allocation priorities and use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units.

Lehigh County recognizes the severe need for housing assistance of all types. However, given limited funding, the County will continue to address the rehabilitation needs of extremely low, low and moderate-income homeowners. As resources become available, the County will also address the need to rehabilitate vacant for-sale housing to revitalize neighborhoods. The County will support the efforts of developers to construct new housing or renovate existing housing for extremely low and low-income renters and homeowners.

32. If the jurisdiction intends to use HOME funds for tenant-based rental assistance, specify local market conditions that led to the choice of that option.

The County does not receive HOME funds as a federal entitlement.

PUBLIC HOUSING STRATEGY 91.215 (c)

33. Describe the public housing agency's strategy to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the public housing agency (including families on the public housing and Section 8 tenant-based waiting list).

1. Maintenance of Housing and Suitable living environment:

The Lehigh County Housing Authority provides 289 units of public housing scattered throughout Lehigh County. The Authority meets the HUD guidelines for income targeting as a means of serving the lower income residents of the County. Preference for public housing and Section 8 Vouchers is given to Lehigh County residents, those residing in affordable housing but paying more than 30% of their income towards housing, those enrolled in education programs or working persons with disabilities and the elderly. For Section 8 Vouchers only, preference is given to those residing in “affordable housing with restrictive covenants.” This ensures that such affordable housing is accessible to the lowest income tenants, and not just those at or below 80% of the area median income.

The Lehigh County Housing Authority maintains the public housing units on an on-going basis utilizing the Capital Fund Program. Housing units are in very good condition. The Executive Director is implementing two Asset Management Plans; one each in northern and southern Lehigh County. The small scale (four to 25 units) of family public housing does not permit asset management at the level of each development.

34. Describe the public housing agency’s strategy for addressing the revitalization and restoration needs of public housing projects within the jurisdiction and improving the management and operation of such public housing.

The Lehigh County Housing Authority (LCHA) is very fortunate in that the public housing stock is not very old. Therefore, the rehabilitation needs of the units are minimal. The housing authority continues to address the needs of residents and involve residents to the extent possible in the agency’s planning and operations.

35. Describe the public housing agency’s strategy for improving the living environment of extremely low-income, low-income, and moderate families residing in public housing.

The LCHA works collaboratively with local service providers to ensure that access to social, educational and recreational opportunities is provided to residents of the public housing.

36. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake to encourage public housing residents to become more involved in management and participate in homeownership. (NAHA Sec. 105 (b)(11) and (91.215 (k))

Public Housing Resident Participation

Family Self-Sufficiency (FSS) programs are provided to Section 8 voucher holders and public housing tenants. The participants tend to be Section 8 families. Currently, there are 50 families participating, and all are Section 8 voucher holders. The Family Savings Account program is available to residents who participate in FSS. This enables families to save money for larger purchases, education, or homeownership.

Given the dispersed nature of the family housing in particular, public housing tenants are not generally involved in management. A few public housing families have agreed to be representatives for the purposes of reviewing the Annual Action Plan. The senior citizen developments in both Emmaus and Slatington have active resident advisory boards that focus on social programs. There are few elderly Latinos.

The Lehigh County Housing Authority concluded a 5(h) Homeownership program in 2006. Twenty single family scattered-site housing units were converted to homeownership. At this time, there are no plans to repeat this program. Homeownership is difficult for Section 8 residents due to the cost of housing in the Lehigh Valley and the new caution being applied to the sub-prime market for loans.

37. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation. (NAHA Sec. 105 (g))

The Lehigh County Housing Authority is neither a troubled agency nor performing poorly.

HOMELESS

PRIORITY HOMELESS NEEDS

****Refer to the Homeless Needs Table 1A or the CPMP Tool's Needs.xls workbook***

38. Describe the jurisdiction's choice of priority needs and allocation priorities, based on reliable data meeting HUD standards and reflecting the required consultation with homeless assistance providers, homeless persons, and other concerned citizens regarding the needs of homeless families with children and individuals.

Homeless Priorities

The Northeast Regional Housing Advisory Board places an emphasis on chronic homelessness. Local efforts at homeless planning have also focused on the chronic homeless. The number of chronically homeless persons has fallen since 2009. There were 38 persons identified in the Point-In-Time (PIT) count in 2011, compared to 57 in 2009. Individuals with mental illness and substance abuse continue to dominate the population of shelters for individual adults. The overall number of single adults in shelter and transitional housing continues to rise.

Concern for the needs of homeless families was also raised by local agencies in the course of development of this plan. Victims of domestic violence, families priced out of their housing, and families living doubled and tripled up are increasingly common. There were fewer families in shelters in 2011 than in 2010.

The most significant gap appears to be in the area of prevention. Homelessness Prevention and Rapid Re-housing funds provided a significant resource to prevent persons from becoming homeless. The City of Allentown is the only Emergency Solutions Grant recipient in the region.

Further, the NE RHAB covers too broad an area to be effective at addressing Lehigh County's specific housing issues that lead to homelessness. There needs to be a coordinated local effort to identify factors that contribute to family homelessness and services that prevent homelessness.

Chronic Homelessness

The Northeast Regional Housing Advisory Board (RHAB) places a high priority on homeless families and individuals, including those who are chronically homeless. Shelter, transitional and permanent supportive housing are each valuable components of the overall Continuum-of-Care, and there are unmet needs for both transitional and permanent housing.

Between 2009 and 2011, there was an increase in the number of beds for chronically homeless individuals. This demonstrates the success of the Lehigh County Conference of Churches' program that provides case management and other services to the chronically homeless and assists the homeless access permanent housing.

Lehigh County is part of a larger continuum of care encompassing 12 counties. The advantage to this is that Lehigh and Northampton Counties are the beneficiaries of a larger pro-rata share than would otherwise be available to these two counties. The disadvantage is that planning becomes more difficult given the diversity within the larger region. The City of Allentown recognized this shortcoming and organized a planning effort focused on the chronically homeless. Although its mission was to address homelessness in Allentown, the reality is that homeless persons are going to find their way to the city because services and facilities are not available in the more rural areas of Lehigh County. Allentown's Plan to End Chronic Homelessness by 2017 addresses the local needs of chronic homeless individuals.

In summary, the chronic homeless plan identifies objectives related to prevention, intervention, organizational infrastructure and a regional approach.

39. Provide an analysis of how the needs of each category of residents (listed in question 38) provided the basis for determining the relative priority of each priority homeless need category.

The NE RHAB has not designated priorities among the various homeless populations. The Continuum of Care funding that is provided from HUD has given priority to persons who have been chronically homeless (defined as homeless for over a year or had four or more episodes of homelessness over the past three years, and persons with disabilities). The definition of chronic homelessness, once confined to single adults, has been expanded to include families who have repeated episodes of homelessness or long periods of homelessness and whose head of household is disabled. Since the severity of problems and extent of problems are greatest among those who are chronically homeless, the societal cost of addressing these problems, through emergency rooms, treatment facilities, and the legal system, is the greatest. Permanent supportive housing has been created to provide the support systems needed for many persons experiencing chronic homelessness.

Families constitute the most numerous homeless population in Lehigh Valley as depicted in the CACLV survey of homelessness. Family homelessness is often due to economic circumstances. To combat family homelessness, budget and financial counseling, prevention programs and other safety net programs have been put in place to prevent homelessness.

HOMELESS STRATEGY 91.215 (d)

40. Describe the strategy for reducing and ending homelessness through reaching out to homeless persons (especially chronically homeless individuals and families) persons (especially unsheltered persons), and assessing their individual needs.

Homelessness – Priority Needs

Lehigh County is part of the larger Lehigh Valley and also the NE Regional Advisory Board on issues pertaining to homelessness. Through participation in larger regional efforts, Lehigh County can more effectively address the needs of homeless individuals and families. Goals and strategies identified for homelessness are as follows.

➤ **Services**

- Expand the capacity of local housing and service providers in rural areas to serve homeless families and individuals.
- Develop new resources for supportive services to supplement mainstream services.

➤ **Shelter and Transitional Housing**

- Continue to meet the regional needs for shelter and transitional housing.
- Shorten the length of time individuals and families are homeless over five years.
- Reduce the recurrence of homelessness among sheltered families and individuals over the next five years.

➤ **Permanent Housing**

- Expand permanent supportive housing for homeless individuals and persons in families with disabilities by creating 34 new permanent supportive housing units in the 12 county Continuum of Care.
- To achieve these goals and strategies, Lehigh County will continue to provide mainstream resources such as Temporary Assistance for Needy Families (TANF), food stamps, mental health and substance abuse counseling and others. If requested, the County will provide a certification of consistency for programs that address homeless needs, consistent with the above goals.

Chronic Homeless Strategy

The NE Regional Housing Advisory Board (RHAB) identified its priorities for addressing the needs of chronic homeless individuals and others: **To prevent homelessness through maximum use of mainstream resources and effective case management.** Implementation of this strategy includes actions:

1. To prevent homelessness through effective discharge planning from publicly funded institutions
2. To expand the capacity of local housing and service providers in rural areas to serve the chronically homeless
3. To expand permanent supportive housing for the chronically homeless
4. To develop resources for supportive services to supplement mainstream services

These goals have been adopted throughout the Northeast Region as a means to address homelessness. As stated above, there is an unmet need for 90 Permanent Supportive Housing beds for individuals. Although not specified in 2012, in prior years the COC indicated that 47 of the permanent supportive housing beds should be reserved for persons who are chronically homeless.

The Allentown's Plan to End Chronic Homelessness, identified strategies related to prevention, intervention and organizational infrastructure. Intervention is the means by which individuals will be connected to housing and assisted in remaining in housing. The plan calls for the creation of 10 additional permanent supportive housing per year which will yield 150 units in ten years. Another strategy is to utilize available housing options by providing support mechanisms. The plan also calls for a more regional approach to the problem.

Lehigh County will support these plans and strategies put forth by the two groups.

41. Describe the strategy for reducing and ending homelessness through addressing the emergency shelter and transitional housing needs of homeless persons.

Lehigh County is not an entitlement recipient of federal Emergency Solutions Grant (ESG) funds. However, the experience in administering the Homelessness Prevention and Rapid Re-housing Program (HPRP) may lead to participation in the Commonwealth of Pennsylvania's ESG program.

The County's goals and strategy for homelessness prevention are:

➤ **Homelessness Prevention**

- Provide rent and utility assistance to 50 households to prevent homelessness.

- Prevent homelessness through effective discharge planning from publicly-funded institutions.

The County may seek Emergency Solutions Grant (ESG) funds from the Commonwealth of Pennsylvania to provide rent and utility support for individuals and families at risk of homelessness. CDBG funds will also be used to provide subsistence payments through Catholic Charities of the Diocese of Allentown.

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

The homeless strategy is carried out through the efforts of the NE Regional Advisory Board (NE RHAB) and the Community Action Committee of the Lehigh Valley. For McKinney Funds, the NE RHAB provides the leadership in preparation of the application. This is a very inclusive body composed of representatives of all sectors of the 12 county area.

43. Describe the strategy for reducing and ending homelessness through helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from publicly funded institutions and systems of care into homelessness (such as health care facilities, mental health facilities, foster care and other youth facilities, and correction programs and institutions) or receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs.

The NE RHAB is participating with other state COCs through the PA Homeless Steering Committee to develop partnerships with state agencies that operate programs that discharge individuals to homelessness. Progress has been made with several agencies. Discharge planning by youth serving agencies includes steps to prepare youth for discharge from foster care and penal institutions. Mental health discharge is coordinated with the County Office of Mental Health. The departments of Corrections and Public Welfare are working to implement a new protocol to ensure that those leaving penal institutions are enrolled in Medical Assistance through the COMPASS: Access to Health and Human Services application process. This process also will tie into food stamps and cash assistance shortly. Providing housing and supportive services to those discharged from health care facilities is more difficult due to the special needs and short time frame involved. The PA Homeless Steering Committee is working with the Department of Health's Division of Acute and Ambulatory Care to research and establish protocols.

Coordination of services and local advocacy ensures that families that are already enrolled in one system of care are properly referred to other agencies providing appropriate services. The implementation of the 2-1-1 system will help expand the degree of coordination.

SPECIFIC OBJECTIVES/HOMELESS (91.215)

44. Identify specific objectives that the jurisdiction intends to initiate and/or complete in accordance with the tables* prescribed by HUD, and how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan. For each specific objective, identify proposed accomplishments and outcomes the jurisdiction hopes to achieve in quantitative terms over a specified time period (one, two, three or more years) or in other measurable terms as defined by the jurisdiction.

Complete and submit Table 1C Summary of Specific Objectives or, if using the CPMP Tool, the Summaries.xls worksheets.

Table 1C

Grantee Name: Lehigh County, Pennsylvania

Obj #	Specific Objectives	Sources of Funds	Year	Performance Indicators	Expected Number	Actual Number	Accomplishment
Availability of Decent Housing (DH-1)							
DH1.1	Development of Permanent Supportive Housing	CDBG COC	2012	Units	20		%
			2013				%
			2014				%
			2015				%
			2016				%
		MULTI-YEAR GOAL		34 units		%	
Affordability of Decent Housing (DH-2)							
DH2.1	Homeless Prevention	CDBG	2012	Households	20 hhds		%
			2013				%
			2014				%
			2015				%
			2016				%
		MULTI-YEAR GOAL		50 hhds			

NON-HOMELESS SPECIAL NEEDS

**Refer to Table 1B Non-Homeless Special Needs or the CPMP Tool's Needs.xls workbook*

PRIORITY NON-HOMELESS NEEDS 91.215 (e)

45. Identify the priority housing and supportive service needs of persons who are not homeless but may or may not require supportive housing, i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction by using the Non-homeless Special Needs Table.

Lehigh County, through its various human services programs, provides support to all the categories of non-homeless special needs populations. The Lehigh County Department of Human Services provides a wide range of programs for its elderly, substance abusers, people with mental health and intellectual disabilities, children and youth and veterans. The CDBG program will not focus on these needs, but the County is addressing the needs to the extent possible.

CDBG funds will be used in support of the counseling and referral services offered by the Lehigh Valley Center for Independent Living.

Table 1B: Special Needs (Non-Homeless) Populations

SPECIAL NEEDS SUBPOPULATIONS	Priority Need Level High, Medium, Low, No Such Need	Multi- Year Goals	Annual Goals Year 1	Annual Goals Year 2	Annual Goals Year 3	Annual Goals Year 4	Annual Goals Year 5
Elderly	High	200	0	40	40	40	40
Frail Elderly	Medium	0	0	0	0	0	0
Severe Mental Illness	High	34	20	5	5	2	2
Developmentally Disabled	Low	0	0	0	0	0	0
Physically Disabled	High	100	20	20	20	20	20
Persons w/ Alcohol/Other Drug Addictions	Low	0	0	0	0	0	0
Persons w/HIV/AIDS	Low	0	0	0	0	0	0
Victims of Domestic Violence	Low	0	0	0	0	0	0
Other	No Such Need	0	0	0	0	0	0
TOTAL		334	40	65	65	62	62

46. Describe the basis for assigning the priority given to each category of priority needs.

Priorities elderly and persons with severe mental illness and persons with physically disabilities were identified based on studies that showed significant needs. Lower priority was given to other population groups although the county provides human services to these populations. It is unlikely that Lehigh County will use CDBG funds to address the needs for any special needs population as CDBG funds are very limited.

47. Identify any obstacles to meeting underserved needs.

During the preparation of this Five-Year Strategic Plan, agencies that work with special needs populations were consulted, and they are overwhelmed with the extent of the need in the community. As an example, the housing needs of persons with developmental disabilities and mental illness far outstrip community resources to address these needs.

The mental health system has been overwhelmed with the need to serve people who formerly were in Allentown State Hospital and have been placed in the community.

Although there are more Community Health Improvement Partnership (CHIP) funds to move the clients into the community, costs outpace allowances. Housing, particularly Community Residential Rehabilitation (CRR) and Independent Living units are filled up with formerly institutionalized clients, leaving no slots for other people with this need.

Creative solutions to the problem, such as adult foster care and congregate housing, are being explored.

48. To the extent information is available, describe the facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

Table 22, page 60, identifies the agencies that provide housing and services for persons with special needs that require supportive housing.

The County utilizes HealthCHOICES funds to house non-homeless persons with mental health diagnosis:

1. Clearinghouse (information and Referral) through the Lehigh County Conference of Churches
2. Project Based Rental Assistance – 20 units set aside at PennRose project
3. Developer-assisted units – 15 units at 2 locations – set up through the Pennsylvania Housing Finance Agency
4. Tenant based rental assistance – 27 subsidized housing units
5. Supportive services including homelessness prevention funds for security deposit, one month rent, utilities

49. If the jurisdiction plans to use HOME or other tenant based rental assistance to assist one or more of these subpopulations, it must justify the need for such assistance in the plan.

Lehigh County is not a HOME entitlement and will not use tenant based rental assistance.

SPECIFIC SPECIAL NEEDS OBJECTIVES 91.215 (e)

50. Identify each specific objective developed to address a priority need by number and contain proposed accomplishments and outcomes the jurisdiction expects to achieve in quantitative terms through related activities over a specified time period (i.e. one, two, three or more years), or in other measurable terms as identified and defined by the jurisdiction.

The jurisdiction may satisfy this requirement by using Table 1C or, if using the CPMP Tool, the Projects.xls worksheets

Utilizing HealthCHOICES funds, the County will expand the availability of supported housing units for persons with mental illness or in recovery from drug and alcohol addiction.

Table 1C: Special Needs

Obj #	Specific Objectives	Sources of Funds	Year	Performance Indicators	Expected Number	Actual #	Outcome/ Objective
Availability of Decent Housing (DH-1)							
DH1.1	Development of housing	Health CHOICES	2012	New units	2		%
			2013				%
			2014				%
			2015				%
			2016				%
			MULTI-YEAR GOAL		20 units		%

51. Describe how federal, state and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

Counties that have successfully managed their medical assistance funds are able to reinvest the remaining funds in housing activities that serve mental health and substance abuse clientele. Creating permanent supportive housing with the funds is a high priority for the Commonwealth of Pennsylvania's Department of Public Welfare. Through a partnership between the County, the PA Office of Mental Health and Substance Abuse Services (OMHSAS), the PA Department of Community and Economic Development and the Pennsylvania Housing Finance Agency, funds are directed to provide housing and support services.

COMMUNITY DEVELOPMENT

PRIORITY COMMUNITY DEVELOPMENT NEEDS 91.215 (f)

**Refers to Table 2B or to the Community Development Table in the Needs.xls workbook*

52. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table* – i.e., public facilities, public improvements, public services and economic development.

Owing to the diverse nature of Lehigh County communities, the non-housing community development needs within the County are varied and disparate, but there are some common elements. Table 2B found on page 111 identifies the community development needs and priorities of Lehigh County.

Public facilities and infrastructure

Public facilities and infrastructure in the older boroughs and villages in the townships is becoming obsolete or deteriorated. The PA Department of Environmental Protection is requiring many townships to install sanitary sewer collection and treatment systems. In addition, the rural poor have a much more difficult time learning about and accessing public services. As in many rural areas throughout the country, public transit is lacking, making transportation for those without cars a significant problem.

Public Services

Access to services in the rural communities was a key discussion point during the input meetings. There is a lack of transportation and information about services in the rural communities.

Economic Development

Lehigh County continues to promote economic development and well being of the community by focusing on urban revitalization, regional partnerships, job creation initiatives, housing programs, grant management and quality of life initiatives. The county has been successful in fostering relationship with regional partners, developing new programs, increasing funds for local programs and creating new job opportunities. This work needs to be continued to provide opportunity for all residents of the county.

53. Describe the basis for assigning the priority given to each category of priority needs provided on Table 2B or the Community Development Table in the CPMP Tool's Needs.xls worksheet.

Priorities for community development needs were established from citizen input and a variety of consultations and meetings and ultimately adopted by the Lehigh County

Executive. While priorities can be generally established for the overall program, individual communities may have specific projects and programs identified as critical only to them. The priority list serves as a general guide to decision-making, not a rule. A multitude of factors determine the funding of individual projects, including readiness and number/concentration of low/moderate person served. The priority identification plays an important, but not absolute, role in project selection.

Highest Priority activities include eligible CDBG projects that will create an impact on the community. Projects that stimulate the redevelopment of the community, enhance the quality of life and expand housing choice will be considered high priority.

Medium Priority activities are those projects that meet critical local municipal needs for infrastructure and community services.

Low Priority is given to eligible activities that meet local needs but are deemed to have little impact on the quality of life of the community.

Most infrastructure and public facility projects will be constructed in eligible areas of low mod concentration.

54. Identify any obstacles to meeting underserved needs.

The principle obstacle to meeting underserved needs is financial (i.e., limited funding). The allocation of federal funds, while significant, is well below levels required to meet the needs of the county's low/moderate income households and communities.

SPECIFIC COMMUNITY DEVELOPMENT OBJECTIVES

55. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

Complete and submit Table 2C Summary of Specific Objectives or, if using the CPMP Tool, the Summaries.xls worksheets.

NOTE: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

24 CFR 91.215(a)(4)

- Community Development/Public Facilities Objectives
- Community Development/Public Improvements Objectives
- Community Development/Public Services Objectives
- Community Development/Economic Development Objectives
- Neighborhood Revitalization Strategy Areas 91.215(g)

Community Development Block Grant (CDBG) funds are directed to local municipalities to address the quality of life in low-income areas through infrastructure and public facility improvements. Non-profit agencies generally address the public services needs of residents in lower income areas.

HUD Table 2-B, page 111, identifies potential CDBG-funded community development activities, including assigned priorities. High priority activities will be funded, medium priority activities will be addressed if funds permit, and low priority activities will not be funded. Planning and program administration activities are not included in the chart.

➤ Public Facilities and Infrastructure

- Assist municipalities with projects of community significance.
 - ✓ Clearance and demolition (two units)
 - ✓ Sewer, water improvements (eight projects)
 - ✓ Storm sewer improvements (five projects)
 - ✓ Sidewalk improvements, including handicap accessibility (ten projects)
 - ✓ Parks and recreation improvements (three projects)

➤ **Public Services**

- Help human service organizations provide essential services to at-risk populations.
 - ✓ Homeless prevention services
 - ✓ Housing referral and counseling
 - ✓ Literacy and English as a Second Language education
 - ✓ Subsistence services
 - ✓ Fair Housing outreach, education and advocacy

Economic Development

The focus of economic development activities will be downtown revitalization and assistance to employers providing living wages and appropriate benefits. Assistance will be provided to micro-enterprise businesses through the Rising Tide Loan Program. Funds may be used to support community revitalization. The following are the goals and strategies.

➤ **Economic Development**

- Assist business establishment and growth in Lehigh County.
 - ✓ Provide loans to two businesses.
 - ✓ Promote façade improvements and downtown revitalization in borough and township business districts.

Table 2C: Community Development Objectives

Obj #	Specific Objectives	Sources of Funds	Year	Performance Indicators	Expected Number	Actual #	Outcome/Objective
Availability/Accessibility of Suitable Living Environment (SL-1)							
SL1.1	Improve quality/quantity of public improvements <ul style="list-style-type: none">Curb rampsADA improvements	CDBG	2012	Public Facilities	3		%
			2013				%
			2014				%
			2015				%
			2016				%
			MULTI-YEAR GOAL		10 p.f.		%
	Improve quality/quantity of public improvements <ul style="list-style-type: none">Public service	CDBG	2012	People	220		%
			2013				%
			2014				%
			2015				%
			2016				%
			MULTI-YEAR GOAL		1,000 people		%
Sustainability of Suitable Living Environment (SL-3)							
SL3.1	Improve quality/quantity of neighborhood facilities <ul style="list-style-type: none">Infrastructure	CDBG	2012	Public Facilities	3		%
			2013				%
			2014				%
			2015				%
			2016				%
			MULTI-YEAR GOAL		16 p.f.		%
Sustainability of Economic Opportunity (EO-3)							
EO3.1	Improve access to business support for microenterprise		2012	People	2		%
			2013				%
			2014				%
			2015				%
			2016				%
			MULTI-YEAR GOAL		2 people		%

Table 2B
Priority Community Development Needs

Priority Need	Priority Need Level	5 Yr Goal Plan/Act	Annual Goal Plan/Act	Percent Goal Completed
Acquisition of Real Property	H	0	0	0
Disposition	H	0	0	0
Clearance and Demolition	H	2	1	0
Clearance of Contaminated Sites	H	0	0	0
Code Enforcement	L	0	0	0
Public Facility (General)		0	0	0
Senior Centers	L	0	0	0
Handicapped Centers	L	0	0	0
Homeless Facilities	L	0	0	0
Youth Centers	M	0	0	0
Neighborhood Facilities	M	0	0	0
Child Care Centers	M	0	0	0
Health Facilities	L	0	0	0
Mental Health Facilities	L	0	0	0
Parks and/or Recreation Facilities	H	3	1	0
Parking Facilities	M	0	0	0
Tree Planting	M	0	0	0
Fire Stations/Equipment	M	0	0	0
Abused/Neglected Children Facilities	L	0	0	0
Asbestos Removal	L	0	0	0
Non-Residential Historic Preservation	M	0	0	0
Other Public Facility Needs	M	0	0	0
Infrastructure (General)		0	0	0
Water/Sewer Improvements	H	8	1	
Street Improvements	M	5	3	0
Sidewalks	H	100	66	0
Solid Waste Disposal Improvements	L	0	0	0
Flood Drainage Improvements	H	5	0	0
Other Infrastructure	M	0	0	0
Public Services (General)		0	0	0
Senior Services	M	200	40	0
Handicapped Services	M	0	0	0
Legal Services	M	0	0	0
Youth Services	M	0	0	0
Child Care Services	M	0	0	0
Transportation Services	M	0	0	0
Substance Abuse Services	M	0	0	0
Employment/Training Services	H	250	100	0
Health Services	L	0	0	0
Lead Hazard Screening	L	0	0	0
Crime Awareness	L	0	0	0
Fair Housing Activities	H	5	1	0
Tenant Landlord Counseling	H	0	0	0
Other Services – Housing Counseling	H	50	25	0
Homeless Prevention	H	50	20	0
Economic Development (General)		0	0	0
C/I Land Acquisition/Disposition	M	0	0	0
C/I Infrastructure Development	M	0	0	0
C/I Building Acq/Const/Rehab	H	0	0	0
Other C/I	M	0	0	0
ED Assistance to For-Profit	H	0	0	0
ED Technical Assistance	M	0	0	0
Micro-enterprise Assistance	H	2	2	0
Other	M	0	0	0

56. If the jurisdiction has one or more approved Neighborhood Revitalization Strategy Areas, the jurisdiction must provide, with the submission of a new Consolidated Plan, either: the prior HUD-approved strategy, or strategies, with a statement that there has been no change in the strategy (in which case, HUD approval for the existing strategy is not needed a second time) or submit a new or amended neighborhood revitalization strategy, or strategies, (for which separate HUD approval would be required).

Not Applicable.

BARRIERS TO AFFORDABLE HOUSING 91.215 (h)

57. Describe the strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing, except that, if a State requires a unit of general local government to submit a regulatory barrier assessment that is substantially equivalent to the information required under this part, as determined by HUD, the unit of general local government may submit that assessment to HUD and it shall be considered to have complied with this requirement.

Recommendations of the Bi-County Planning Commission and the Affordable Housing Policy Advisory Committee shall constitute the strategy that the County will adopt for this Five-Year Strategic Plan. The Bi-County Planning Commission Housing Assessment offered the following recommendations:

- There are opportunities available for more collaborative initiatives between for-profit developers and nonprofit organizations in the Lehigh Valley. By partnering with an experienced for-profit developer, a smaller nonprofit can enhance its capacity in budgeting, planning, financing and construction management skills.
- There are also opportunities for public housing authorities to create new affordable housing.
- Developers identified the insufficient supply of land zoned for multi-family housing as one of the factors driving up the cost of land acquisition and development. Outreach initiatives focused on educating public officials and planning commissions on the benefits of affordable housing may encourage the rezoning of more land to multi-family zoning designations, as well as eliminate unnecessary and excessive development standards for multi-family housing.
- Active and productive nonprofit housing developers need ready access to capital in order to finance the front-end soft costs associated with new development. Utilizing a less-restrictive source of financing for this (such as Act 137 Housing Trust Fund resources) would enable nonprofits to seek out more development opportunities and fully investigate the financial feasibility of potential projects early on.

Further, the Affordable Housing Policy Advisory Committee offered the following recommendations related to public policy:

- Educate and inform owners of tax-credit development and County assessors about Act 39 of 2003 (HB 1854), a law that instructs assessors to consider rent restrictions, affordability restrictions, and the income approach to value rather than comparable sales approach to value, when assessing affordable housing developments.
- Encourage municipalities to consider a “streamlined” approach to obtain permits and funding for affordable housing projects.
- Develop model inclusionary housing ordinance. This ordinance could provide financial and other incentives to developers in exchange for the provision of a

- percentage of housing units set aside for households with incomes at or below 80% of the area median income.
- Encourage municipal officials to revise their local zoning ordinances to reflect more opportunities for affordable housing development. Using cost-benefit analyses, illustrate how family housing and clustered single family development can be more cost-effective to local elected officials. Encourage local units of government to revise their ordinances to be consistent with the Lehigh Valley Comprehensive Plan.
 - Use the designated Urban Areas as incentives for affordable housing project applications. These geographic locations include areas where infrastructure already exists or could be expanded most effectively, prevent further sprawl, and preserve open space and agricultural areas.
 - Provide relief from impact fees to developers who build affordable housing units, but encourage their use to the maximum extent possible on market rate housing. Consider providing relief to schools as well.
 - Advocate amending the Municipal Planning Code (MPC) to require Fair Share Housing. Work to amend the MPC to require all municipalities to provide the opportunity for their fair share of affordable housing units, including new family units, new elderly units, the adaptive re-use of underutilized building, homebuyer assistance, housing rehabilitation, and other creative mechanisms. Amending the MPC is a top priority of the Pennsylvania State Planning Board.
 - Encourage land use policies that diversify the affordable housing stock in the Lehigh Valley to address needs of smaller families, people with disabilities needing supportive housing, and seniors; encourage multi-use, residential development in commercial structures in business zones; and encourage village style/mixed use development. Village centers will contain a mix of stores, restaurants, professional offices that would be appropriate settings for low to moderate-income housing at an increased density.
 - Investigate the development of an "Affordable Housing Legal Defense Fund" that would provide legal support for efforts to challenge ordinances that prevent affordable housing development.

LEAD-BASED PAINT 91.215 (i)

58. Describe the jurisdiction's plan to evaluate and reduce lead-based paint hazards and describe how lead-based paint hazards will be integrated into housing policies and programs, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Lehigh County addresses lead-based paint in houses that participate in the Countywide Housing Rehabilitation Program.

State law passed in 2010 requires all contractors to provide homeowners with information on the possible dangers of lead-based paint during construction work. The County will provide information to organizations and municipalities to disseminate that reinforces the importance of the warning with consumers. The County will also encourage municipalities to follow up on the required lead-based paint training and certification of contractors who obtain licenses.

ANTIPOVERTY STRATEGY 91.215 (j)

59. Describe the jurisdiction's goals, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually).

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

In Lehigh County, Community Action Committee of the Lehigh Valley (CACLV) is the official anti-poverty agency. CACLV provides rent and utility assistance, case management and counseling services to assist with financial management and benefit entitlement assistance, home weatherization to reduce utility costs, furniture and household goods, alcohol and mental health counseling, a Family Savings Account Program, foreclosure mitigation counseling, child care, transportation to work for up to six months and assistance in purchasing a dependable vehicle, and other varied programs that empower low-income households by assisting them to develop skills for independent living.

CACLV offers programs that meet basic needs while encouraging self-sufficiency; works towards the economic and community development of low-income neighborhoods; engages in community planning and advocacy efforts with community participation; and establishes partnerships with community organizations, local government, and the private sector. CACLV offers food for the hungry through over 260 sites affiliated with the Second Harvest Food Bank of the Lehigh Valley and Northeastern Pennsylvania and short and long-term shelter for homeless families at the Sixth Street Shelter, Turner Street Apartments and Ferry Street Apartments. Community Action Financial Services is a HUD and PHFA-certified counseling agency that increases self-sufficiency, financial literacy, and asset-building by providing education, counseling, and assistance regarding home ownership, predatory lending, mortgage foreclosure, individual development accounts, tenant rights and responsibilities, earned income tax credit and child care tax credit, and free tax preparation (VITA program). The Work Ready program coordinates with the Assistance Offices of Lehigh and Northampton Counties to work with individuals with a history of difficulty in finding and keeping a job to improve their employability skills and obtain employment. CACLV's Energy Partnership offers assistance with home heating problems through direct financial assistance, counseling, and weatherization of residences. The West Ward Neighborhood Partnership brings together multiple stakeholders to revitalize Easton's West Ward by offering urban ecology opportunities, small business and commercial façade rehabilitation, streetscape improvement

CACLV is also committed to economic and community development because we believe people have the best chance of reaching their full potential when their communities are places where people want to work, live, and play. CACLV's economic/community development work is conducted by its subsidiary corporations. Community Action Development Corporation of Allentown and Community Action Development Corporation of Bethlehem, work with residents in establishing new businesses and revitalizing their

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community. The Rising Tide Community Loan Fund, a federally-certified community development financial institution, provides microloans and technical assistance to businesses.

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

To assist with economic development in support of job creation, Lehigh County administers various initiatives and agencies in support of economic development.

- The Lehigh County Department of Community and Economic Development (DCED) works with the Lehigh Valley Chamber of Commerce through the Borough Business Revitalization Program (BBRP) to provide economic development services to the Lehigh Valley's small towns. The BBRP mobilizes volunteers and partners in the public and private sectors to target investment and development into the Lehigh Valley's smaller urban cores and central business districts.
- Lehigh County works in conjunction with Lehigh Valley Economic Development Corporation (LVEDC), community organizations, other economic development groups and the Workforce Investment Board to help enhance programs and create opportunities in the County.
- Lehigh County Economic Development Corporation (LVEDC) is able to provide manufacturing, industrial, and nonprofit organizations with low interest financing generated through tax exempt revenue bonds.
- Lehigh County CareerLink offers job search counseling, skills assessment programs, GED courses, information on training programs and workshops on many subjects, including resume writing and interview skills. Considered a one-stop location for all employment needs, CareerLink offers a multifaceted approach to the job market. Specialized services for mature workers, youth, and people with disabilities, veterans, dislocated workers and cash assistance recipients are available at CareerLink.

Job creation and economic growth is increasingly becoming linked through workforce housing awareness. Options for expanding housing opportunities in closer proximity to jobs and reducing the transportation burden or creating new jobs in areas closer to the housing centers in the County are being explored.

60. Identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the jurisdiction has control.

Factors that affect poverty and income are education, job training, health, housing quality, cost of living and employment. As a single unit of government, Lehigh County has only limited influence on the overall factors that cause poverty. However, the county will collaborate with human services, social services (such as its local Community Action

Committee of Lehigh Valley), and economic development agencies and organizations to facilitate their efforts and maximize their resources to provide quality services to low-income residents to help them improve their incomes.

Through the collaboration described above and in response to question 59 on the preceding pages, the county can positively influence the likelihood of poverty-stricken residents moving up and out of poverty, reduce the number of residents living in poverty by minimizing threats to individual and family financial stability, and extend services that will provide adequately for those in need.

Ultimately, federal and state policies on welfare, health care, and the minimum wage are also crucial factors in the fight to address and reduce poverty. Lehigh County will continue to support organizations that provide supportive services to encourage local economic development, and to preserve and improve affordable housing options as part of its strategy to prevent and alleviate poverty.

INSTITUTIONAL STRUCTURE 91.215 (k)

61. Provide a concise summary of the institutional structure through which the jurisdiction will carry out its consolidated plan, including private industry, non-profit organizations, community and faith-based organizations, philanthropic organizations, the Continuum of Care, and public institutions.

Institutional Structure

As discussed under the heading “Managing the Process”, the Lehigh County Department of Community and Economic Development (DCED) is the lead agency for the preparation of the Five-Year Strategic Plan and administration of the grants programs. The DCED will work with local municipalities and other funded agencies in the implementation of program activities. Based on an annual application cycle, local municipal project housing and economic development and public service projects will be funded. Funds will be provided to each entity administering the activities through subrecipient agreements.

The DCED has been working closely with CACLV and the Lehigh Valley Community Land Trust (LVCLT). The LVCLT plays a key role in the implementation of the NSP I program.

The County hired a third-party vendor to implement the housing rehabilitation program. Community Grants and Planning & Housing, LLC. (CGP&H) is working with the County to ensure that the housing rehabilitation program provides assistance to lower income homeowners.

Lehigh County is part of the Northeast Regional Housing Advisory Board (NE RHAB). To promote a more local approach, Allentown has initiated a planning process that will require regional support. Lehigh County has been supportive of this initiative. The County will continue to support the Continuum of Care process so that agencies may continue to provide services to the homeless and to support housing applications for funding made by organizations that provide housing for persons with special needs.

The Lehigh Valley Planning Commission will also be the entity responsible for performing project oversight required under Executive Order 12372. HUD has acknowledged that the Commonwealth of Pennsylvania no longer has a standing committee for this required function and has asked communities instead to utilize committees set up under Section 204 of the Demonstration Cities and Metropolitan Development Act of 1966. This function will be carried out by the Lehigh Valley Planning Commission.

In support of economic development goals, the County will coordinate activities with the Lehigh Valley Economic Development Corporation (LVEDC) and the Community Action Committee of the Lehigh Valley (CACLV). The County will continue its support of the Lehigh Valley Chamber of Commerce downtown improvement initiatives.

62. Provide an assessment of the strengths and gaps in the delivery system.

The County staff has gained experience during the first Five-Years as an entitlement community under the CDBG program. The staff has successfully implemented other HUD programs including the Neighborhood Stabilization Program I, Homelessness Prevention and Rapid Re-housing program and CDBG-R. The staff is responsible for all functions of the program including: environmental review, IDIS funds management, procurement, and eligibility and fundability (meeting a national objective) of activities.

The County staff also coordinates with a variety of other economic development and housing activities. These efforts blend very well with CDBG activities. The County has initiated planning efforts in several municipalities to lead an effort at downtown revitalization and economic growth. CDBG funds can augment and compliment these activities by bringing resources for housing and economic development into the process. Additional housing resources through the Affordable Housing Trust Fund can be accessed to implement the goals of the strategic plan.

On a larger scale, the nature of the division created by HUD program requirements between the Urban County and the entitlement communities within the County creates a structural gap. The cities of Allentown and Bethlehem are entitlements in their own right and administer their own programs. Coordination between the various programs is needed to ensure that the needs of lower income families throughout the community are being met.

Regionally, the Lehigh Valley is coming together for housing, transportation and economic development planning under the Sustainable Communities Regional Planning Grant. A regional Analysis of Impediment to Fair Housing will be one of several reports developed under this planning initiative.

Public Housing

The Lehigh County Housing Authority serves Lehigh County outside of the cities of Allentown and Bethlehem. The Lehigh County Executive recommends board appointments to the County Commissioners who approve the appointments. The housing authority is solely responsible for hiring of its employees and utilizes the state civil service process. There has been no joint procurement or contracting between the County and housing authority to date. The housing authority operates 289 public housing units scattered throughout the County. It has developed good relationships with local jurisdictions in which public housing is located. The housing authority does not intend to demolish or construct any new public housing in the foreseeable future. It will continue to maintain existing public housing units utilizing Capital Fund Grants provided by HUD.

COORDINATION 91.215 (I)

63. Describe the efforts to enhance coordination among the Continuum of Care, public and assisted housing providers and governmental health, mental health, and service agencies.

NOTE: This summary must address the jurisdiction's efforts to coordinate housing assistance and services for homeless persons (especially chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons who were recently homeless but now live in permanent housing.

Lehigh County is part of the regional Continuum of Care. Through the NE RHAB, the entities that provide services to the homeless (i.e., public housing authorities, assisted housing providers, health and mental health agencies) are brought together to address the needs of the homeless and those in supportive housing.

64. Describe the means of cooperation and coordination among the state and any units of general local government in the metropolitan area in the implementation of the plan.

Lehigh County received funding and support from the Commonwealth of Pennsylvania in carrying out the objectives of the Five-Year Strategic Plan 2007-2011. The funding for NSP I and HPRP was received through the state. For the new Five-Year Strategic Plan, 2012-2016, the county expects to continue to receive grant support such as the recently awarded HOME grant.

The local municipalities in the county outside the cities participate in the Urban County entitlement program and contribute to implementation by carrying out their individual projects as well as promoting other programs offered by the county. There is cooperation between the county and Northampton County and the cities in the region, Allentown, Bethlehem and Easton, in implementation of fair housing goals and activities and housing programs, particularly the NSP I program.

65. Describe efforts to enhance coordination with private industry, businesses, developers, and social service agencies, particularly with regard to the development of the jurisdiction's economic development strategy.

The Lehigh Valley was recently awarded a Sustainable Communities Regional Planning Grant from HUD. Through this effort, the Five-Year Strategic Plan and the larger regional plan will be implemented. As described in *Prosper Lehigh Valley*, a blog on economic development in the Lehigh Valley, eleven agencies came together to apply for this grant through the U.S. Department of Housing and Urban Development (HUD). This grant was one of a few programs that are made possible through the federal Office of Sustainable Communities, a historic collaboration among HUD, U.S. Department of Transportation, and

the U.S. Environmental Protection Agency. Locally, the 11 partners applied through the Lehigh Valley Economic Development Corporation as the Lehigh Valley Sustainability Consortium (LVSC). The members of the LVSC are:

1. Lehigh County Department of Community and Economic Development
2. Northampton County Department of Community and Economic Development
3. Lehigh Valley Planning Commission
4. Lehigh and Northampton Transportation Authority
5. Community Action Committee of the Lehigh Valley
6. The Wildlands Conservancy
7. Lehigh Valley Economic Development Corporation
8. Renew Lehigh Valley
9. City of Allentown
10. City of Bethlehem
11. City of Easton

The LVSC will create a sustainable Lehigh Valley by implementing the *Comprehensive Plan The Lehigh Valley...2030*, which meets the definition of a sustainability plan and embodies the six livability principles. LVSC will further the adoption of the plan by promoting adoption of affordable housing policies at the municipal level and fostering transit-related land development to support public transportation. LVSC will also prepare an Assessment of Jobs/Housing Balance and a Regional Economic Development Plan that promotes sustainability. Throughout the development of the Regional Economic Development Plan and promotion of the Comprehensive Plan, LVSC will engage the community through public participation sessions. All types of communities will be targeted in this process to ensure all populations are given a voice in direction of the region.

The Consortium aims to develop stable, working communities by connecting workers with economic opportunities throughout the region and bringing jobs back to the cities. The opportunity gaps and the distributional inequalities in the region will widen unless addressed by an aggressive policy that is both sustainable and transformative.

The first step of this process will be an update to the report titled *An Affordable Housing Assessment of the Lehigh Valley, 2007*, including data associated with *Housing in the Lehigh Valley, 2008*. This update will direct the implementation strategies of the Lehigh Valley Affordable Housing effort that is housed at CACLV. A regional Analysis of Impediments to Fair Housing will also be prepared as part of the housing element of the plan.

The Consortium will foster transit related land development as a key component to creating a more livable Lehigh Valley. The Lehigh and Northampton Transportation Authority (LANTA) will monitor land development and pursue ordinance changes along priority transit corridors. In addition, LANTA will be a key partner in the development of the regional Comprehensive Economic Development Plan.

A Jobs and Housing Study will be developed by LVPC and will be the jumping off point for a comprehensive economic development plan. This economic development plan will focus on increasing economic competitiveness and improving the relationship between job

locations and housing opportunities. An economic model will be employed to create and analyze various economic scenarios as part of this plan.

Finally, the region will become more sustainable by fostering three catalytic projects — one each in Allentown, Bethlehem and Easton. These projects will directly improve and support existing communities, and increase the access to jobs for these neighborhoods.

Throughout all pieces of the work plan, the Lehigh Valley Sustainability Consortium will engage the communities. By utilizing the resources of CACLV, all of the partners in the Consortium will have meaningful input from under-represented populations of the two counties.

66. Describe the jurisdiction's efforts to coordinate its housing strategy with local and regional transportation planning strategies to ensure to the extent practicable that residents of affordable housing have access to public transportation.

The Sustainable Communities Regional Planning Grant also focuses on transportation and LANTA, the regional transit agency, is involved in the grant implementation as well. The Lehigh Valley Planning Commission (LVPC) has issued a Request for Proposal to undertake a Jobs/Housing Balance Study for the Lehigh Valley. Part of this study will be defining commuting patterns and making recommendations to achieve a better balance between jobs and housing.

A formal agreement exists between LANTA, the regional transportation provider, and the Lehigh Valley Planning Commission (LVPC) to work on developing and supporting land use patterns that are more transit friendly. Lehigh County principally has low density housing outside the cities. There is a lack of the high density transportation corridors that support mass transit. The LVPC advances and promotes zoning and codes that are friendly to the development of smaller houses that are conducive to higher density. They will be working with the local municipalities to advance these goals.

MONITORING 91.230

67. Describe the standards and procedures the jurisdiction will use to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Performance monitoring is an important component in the long-term success of the County's community development program. The Department of Community and Economic Development is responsible for implementing standards and procedures for ensuring that the recipients of community development funds meet the purposes of the appropriate legislation and regulations, and that funds are disbursed in a timely fashion.

The Lehigh County Department of Community and Economic Development (DCED) oversees the County's housing and community development programs, and will be responsible for all performance measurement activities. The DCED incorporates objective standards and methods into the process of awarding funds, allocating resources to programs and agencies, and obtaining progress and completion reports from those programs and agencies.

The County has promulgated subrecipient monitoring procedures and developed checklists to ensure that each CDBG-funded activity is completed in a manner consistent with the requirements of the CDBG Program.

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

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

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

The Department reviews all proposed activities for eligibility under statutory and regulatory requirements, and for meeting identified needs in this plan.

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

All subrecipients must identify the personnel working on the project, keep accurate records and filing systems to document program benefits and compliance, maintain an appropriate financial management system, submit to an audit, and submit a final report as a closeout procedure.

Annually, in the preparation of the Consolidated Annual Performance and Evaluation Report (CAPER), the County will review whether the specific objectives outlined in this Five-Year Strategic Plan are being met. Further, this review will be an opportunity to assess if the Five-Year Strategic Plan goals continue to address community priorities and if adequate resources are available to meet the objectives. Community input will be sought in this analysis.

Performance Measurement Plan

In accordance with HUD's Community Planning and Development Notice 03-09, the County must develop a Performance Measurement System designed to measure both the productivity and impact of the Community Development Block Grant Program. In accordance with the HUD Training Manual and Guidebook Community Planning and Development Outcome Performance Measurement Framework, Lehigh County has developed the following:

For each activity the County is required to indicate the Objective and Outcome as per the federal guidelines, these being:

Objectives:

- Creating Suitable Living Environments
- Providing Decent Affordable Housing
- Creating Economic Opportunities

Outcomes:

- Availability/ Accessibility
- Affordability
- Sustainability

The combination of these factors creates an outcome statement for each activity. The outcome statement is also indicated on the individual project activity forms under proposed Outcome. Additionally, the county will indicate the specific outcome indicators that are required to be reported to HUD for each activity.

HOUSING OPPORTUNITIES FOR PEOPLE WITH AIDS (HOPWA)

**Refers to the HOPWA Table in the Needs.xls workbook.*

68. Describe the activities to be undertaken with HOPWA Program funds to address priority unmet housing needs for the eligible population. Activities will assist persons who are not homeless but require supportive housing, such as efforts to prevent low-income individuals and families from becoming homeless and may address the housing needs of persons who are homeless in order to help homeless persons make the transition to permanent housing and independent living.

69. Identify any obstacles to meeting underserved needs and summarize the priorities and specific objectives, describing how funds made available will be used to address identified needs.

Not applicable

70. The Plan must establish annual HOPWA output goals for the planned number of households to be assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. The plan can also describe the special features or needs being addressed, such as support for persons who are homeless or chronically homeless. These outputs are to be used in connection with an assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.

Not applicable

71. For housing facility projects being developed, a target date for the completion of each development activity must be included and information on the continued use of these units for the eligible population based on their stewardship requirements (e.g. within the ten-year use periods for projects involving acquisition, new construction or substantial rehabilitation).

Not applicable

72. Provide an explanation of how the funds will be allocated including a description of the geographic area in which assistance will be directed and the rationale for these geographic allocations and priorities. Include the name of each project sponsor, the zip code for the primary area(s) of planned activities, amounts committed to that sponsor, and whether the sponsor is a faith-based and/or grassroots organization.

Not applicable

COUNTY OF LEHIGH

73. Describe the role of the lead jurisdiction in the eligible metropolitan statistical area (EMSA), involving (a) consultation to develop a metropolitan-wide strategy for addressing the needs of persons with HIV/AIDS and their families living throughout the EMSA with the other jurisdictions within the EMSA; (b) the standards and procedures to be used to monitor HOPWA Program activities in order to ensure compliance by project sponsors of the requirements of the program.

Not applicable

Specific HOPWA Objectives

74. Identify specific objectives that the jurisdiction intends to initiate and/or complete in accordance with the tables* prescribed by HUD.
Complete and submit Table 1C Summary of Specific Objectives or, if using the CPMP Tool, the Summaries.xls worksheets.

Not applicable

75. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

Not applicable

OTHER NARRATIVES AND ATTACHMENTS

76. Include any Strategic Plan information that was not covered by a narrative in any other section. If optional tables are not used, provide comparable information that is required by consolidated plan regulations.

Not applicable

77. Section 108 Loan Guarantee: If the jurisdiction has an open Section 108 project, provide a summary of the project. The summary should include the Project Name, a short description of the project and the current status of the project, the amount of the Section 108 loan, whether you have an EDI or BEDI grant and the amount of this grant, the total amount of CDBG assistance provided for the project, the national objective(s) codes for the project, the Matrix Codes, if the activity is complete, if the national objective has been met, the most current number of beneficiaries (jobs created/retained, number of FTE jobs held by/made available to LMI persons, number of housing units assisted, number of units occupied by LMI households, etc.)

Not applicable

78. Regional Connections: Describe how the jurisdiction's strategic plan connects its actions to the larger strategies for the metropolitan region. Does the plan reference the plans of other agencies that have responsibilities for metropolitan transportation, economic development, and workforce investment?

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