

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

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

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

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

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

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

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

The goal of Lehigh County’s Department of Community and Economic Development is to help to plan and design the County's form and character, support community values, preserve the environment, promote the wise use of resources and protect public health and safety through code enforcement. The Department of Community and Economic Development is the administrator of the Community Development Block Grant. The office also provides outreach and technical assistance for a variety of downtown and County-wide community and economic development projects.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	437	441	0	0	0
Arts, Entertainment, Accommodations	9,547	12,123	10	9	0
Construction	4,740	4,832	5	4	-1
Education and Health Care Services	22,420	30,767	23	24	1
Finance, Insurance, and Real Estate	5,080	4,760	5	4	-2
Information	1,635	1,468	2	1	-1
Manufacturing	11,810	14,897	12	11	-1
Other Services	3,310	3,068	3	2	-1
Professional, Scientific, Management Services	9,603	10,538	10	8	-2
Public Administration	0	0	0	0	0
Retail Trade	11,037	14,419	11	11	0
Transportation and Warehousing	6,167	13,874	6	11	4
Wholesale Trade	4,967	7,927	5	6	1
Total	90,753	119,114	--	--	--

Table 37 - Business Activity

Data Source: 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	119,441
Civilian Employed Population 16 years and over	114,010
Unemployment Rate	4.48
Unemployment Rate for Ages 16-24	13.36
Unemployment Rate for Ages 25-65	3.10

Table 38 - Labor Force

Data Source: 2016-2020 ACS

Occupations by Sector	Number of People
Management, business and financial	31,444
Farming, fisheries and forestry occupations	2,938
Service	9,909
Sales and office	24,574
Construction, extraction, maintenance and repair	7,575
Production, transportation and material moving	6,536

Table 39 – Occupations by Sector

Data Source: 2016-2020 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	70,747	68%
30-59 Minutes	24,097	23%
60 or More Minutes	9,043	9%
<i>Total</i>	<i>103,887</i>	<i>100%</i>

Table 40 - Travel Time

Data Source: 2016-2020 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	2,588	243	2,069

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	23,870	1,133	6,600
Some college or Associate's degree	27,035	1,192	4,643
Bachelor's degree or higher	40,830	1,086	5,674

Table 41 - Educational Attainment by Employment Status

Data Source: 2016-2020 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	102	300	358	733	2,488
9th to 12th grade, no diploma	1,657	478	739	2,290	3,127
High school graduate, GED, or alternative	5,481	5,720	6,333	19,649	16,315
Some college, no degree	5,587	4,804	4,958	9,739	5,238
Associate's degree	997	2,603	3,349	7,464	3,156
Bachelor's degree	2,049	7,874	6,979	14,575	6,226
Graduate or professional degree	229	3,354	5,724	9,089	5,490

Table 42 - Educational Attainment by Age

Data Source: 2016-2020 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	597,120
High school graduate (includes equivalency)	1,327,222
Some college or Associate's degree	1,638,858
Bachelor's degree	2,308,363
Graduate or professional degree	2,768,312

Table 43 – Median Earnings in the Past 12 Months

Data Source: 2016-2020 ACS

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

The Education and Health Care Services Sector is the largest single sector in terms of number of employees in Lehigh County, at 22,420 employees. Following the Education and Health Care Services sector,

Manufacturing employs the second-most employees at 11,810 and Retail Trade just behind at 11,037. Retail trade also employ more than 10,000 employees. Lehigh County currently has 30,767 jobs in the Education and Health Care Services Sector, showing a slight imbalance between jobs available and employees in that sector with only 72.9% of jobs in that sector filled. There are 13,874 jobs in the Transportation and Warehousing sector, with only 44.4% of sector jobs filled.

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

Lehigh County is a large geographic area that expects consistent population growth and subsequent economic growth. The technology and payroll processing company ADP opened a large headquarters in downtown Allentown in late 2019, which brought up to 1,000 jobs to the region. Benefits to Allentown will cause economic growth in the surrounding peripheral communities in the County and provide additional opportunities for job growth. Additional workforce development and job training will be required to fill positions at ADP, as well as other positions that may open with the continued revitalization of downtown Allentown.

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

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

With employment in Lehigh County focused on Education/Health Care and the Manufacturing Sectors, the County has a relatively even mix of Associate/Bachelor/Graduate degree individuals (41.7%) and High School Graduate/Some College individuals (48.6%). It should be noted that the median age of workers above 16 was 42.1 years of age, and that over 60% of the workforce in Lehigh County is above the age of 35.

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

Workforce Board Lehigh Valley has multiple initiatives to train workers in the region. Workforce Board Lehigh Valley provides training for multiple types of positions and attempts to fill gaps in the area school systems' curricula. Communities in Schools of Eastern Pennsylvania also seeks to fill these gaps with career supports and soft skill education for at-risk youth.

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

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

Yes. The Commonwealth of Pennsylvania announced a Comprehensive Economic Development Strategy (CEDS) in January 2024, and the Lehigh Valley Economic Development Corporation (LVEDC) is a participating member. LVEDC seeks to meet the needs of employers in the area with the goal of attracting larger businesses to the region. It markets the land, space, and talent for companies to come to the Lehigh Valley and either open a business or grow their business. This benefits the residents of Lehigh County and creates opportunities for community and economic development in the County. The participating jurisdictions (Lehigh and Northampton Counties and the Cities of Allentown, Bethlehem, and Easton) are currently developing a Comprehensive Economic Development Strategy for the Lehigh Valley; until such time as it is complete, any organization applying for a grant that requires a CEDS to be filed with their application may request a copy of Lehigh Valley's CEDS alternative document from LVEDC.

Discussion

As of April 2024, the unadjusted unemployment rate in Lehigh County was 3.0%, compared to 3.1% for the Allentown-Bethlehem-Easton MSA, 2.9% for the Commonwealth of Pennsylvania, and 3.7% for the Country as a whole. The County enjoys a low unemployment rate; however, the need for jobs and job training for the disabled and very low income remains a priority.

MA-50 Needs and Market Analysis Discussion

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

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

An area which has a higher concentration of minorities than the County as a whole can be considered a place where these families are concentrated. As of the 2018-2022 American Community Survey estimates, residents of Lehigh County (excluding the Cities of Allentown and Bethlehem) were 81.41% White, 3.46% of residents were Black or African American, 3.80% were Asian, 2.74% were Some Other Race, 8.40% were of Two or More Races, and 12.33% were Hispanic or Latino of any race. The following areas have higher rates of minority residents when compared to the County as a whole (excluding the Cities of Allentown and Bethlehem) according to American Community Survey data:

- Alburtis Borough has a population which is 5.06% Black or African American, 4.40% Asian, 11.02% Some Other Race, 9.30% Two or More Races, and 19.38% Hispanic or Latino of any race;
- Catasauqua Borough has a population which is 9.61% Two or More Races and 17.43% Hispanic;
- Coplay Borough has a population which is 4.10% Some Other Race, 17.73% Two or More Races, and 27.82% Hispanic;
- Emmaus Borough has a population which is 4.46% Black;
- Fountain Hill Borough has a population which is 15.36% Some Other Race, 8.49% Two or More Races, and 34.74% Hispanic;
- Hanover Township has a population which is 8.35% Black, 16.96% Some Other Race, 9.46% Two or More Races, and 38.35% Hispanic;
- Lower Macungie Township has a population which is 3.65% Black, 4.57% Asian, and 7.69% Two or More Races;
- Macungie Borough has a population which is 6.34% Black, 16.53% Two or More Races, and 23.42% Hispanic;
- Salisbury Township has a population which is 4.68% Some Other Race, 9.90% Two or More Races, and 17.63% Hispanic.
- Slatington Borough has a population which is 15.85% Hispanic;
- South Whitehall Township has a population which is 6.19% Asian, 10.21% Two or More Races, and 12.65% Hispanic;
- Upper Macungie Township has a population which is 8.22% Black, 11.64% Asian, 9.50% Two or More Races, and 14.11% Hispanic;
- Upper Saucon Township has a population which is 6.73% Two or More Races; and
- Whitehall Township has a population which is 7.05% Black, 4.02% Asian, 3.71% Some Other Race, 14.02% Two or More Races, and 20.71% Hispanic.

Statistical Atlas ([statisticalatlas.com](https://www.statisticalatlas.com)) shows that of the foreign-born population in Lehigh County, over half (55.3%) have their origin in the Americas and another 26.9% immigrated from Asia.

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

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

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

Are there any community assets in these areas/neighborhoods?

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

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

Are there other strategic opportunities in any of these areas?

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

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Per HUD guidance, all Consolidated Plans submitted after January 1, 2018, must address broadband needs within the jurisdiction.

Lehigh County has worked with internet service providers, municipalities, intermediate units, and its broadband consultant to not only assess the overall need for broadband in the County, but also pursue shovel-ready projects in known areas of need. During and immediately after the COVID pandemic, the County considered setting aside SLFRF dollars to support broadband expansion efforts (either through direct investment in current shovel-ready projects or through long-term planning for future expansion).

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MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction’s increased natural hazard risks associated with climate change.

The Disaster Mitigation Act of 2000 required counties to develop Multi-Jurisdiction Hazard Mitigation Plans which encompassed local municipalities. Hazard mitigation planning reduces loss of life and property by minimizing the impact of disasters. It begins with state, tribal, and local governments identifying natural disaster risks and vulnerabilities that are common in their area. After identifying these risks, they develop long-term strategies for protecting people and property from similar events. Mitigation plans are key to breaking the cycle of disaster damage and reconstruction.

The Lehigh Valley Hazard Mitigation Plan, since its inception, has always been a bi-county plan encompassing both Lehigh and Northampton Counties as well as the 62 municipalities found within. The Lehigh Valley drafted hazard mitigation plans in 2006, 2013, and 2018. Federal regulation requires that plans be updated every five years, but perhaps more importantly, the effects of climate and cultural changes and emerging hazards require that we evolve our methods of preparing for disaster. The Lehigh Valley Hazard Mitigation Plan reflects that evolution.

The 2024 Hazard Mitigation Plan covers the twenty-five (25) natural and non-natural hazards that were covered in the previous plan. However, two (2) new hazards have been added to combat changes in a region that continues to grow its population by more than five thousand (5,000) residents per year. The newly added hazards are: Gas/Liquid Pipelines and Cyber-Terrorism. Both new hazards can be found under the “non-natural” hazard list. See the entire hazard list and their respective rankings below and documented within the Lehigh and Northampton County Annex.

Natural Hazards

Hazard Risk	Natural Hazards	Probability	Impact	Extend	Warning	Duration	Risk Factor
HIGH	Pandemic & Infectious Disease	4	4	4	1	4	3.7
	Extreme Temperature	3	3	4	1	3	3
	Flood	4	2	3	3	3	3
	Winter Storm	3	2	4	1	2	2.6
	Windstorm / Tornado	2	3	3	3	2	2.6
	Invasive Species	4	1	3	1	4	2.6
	Drought	2	2	4	1	4	2.5
	Subsidence / Sinkhole	4	1	1	4	4	2.5
MODERATE	Radon	4	1	2	1	4	2.4
	Wildfire	3	1	2	3	2	2.1
	Lightning	4	1	1	3	1	2.1
LOW	Earthquake	1	1	4	4	1	1.9
	Hailstorm	2	1	2	3	1	1.7
	Landslide	2	1	1	4	1	1.6

Non-Natural Hazards

Hazard Risk	Non-Natural Hazards	Probability	Impact	Extend	Warning	Duration	Risk Factor
HIGH	Cyber-Terrorism	4	3	3	4	4	3.5
	Terrorism	3	4	4	4	2	3.5
	Drug Overdose Crisis	4	3	3	1	4	3.2
	Utility Interruption	4	2	3	3	3	3
	Environmental Hazards / Explosions	4	2	2	4	3	2.9
	Gas/Liquid Pipeline	4	2	2	4	2	2.8
	Fire (Urban / Structural)	4	2	1	4	2	2.6
MODERATE	Transportation Crash	4	1	1	4	1	2.2
	Civil Disturbance	4	1	1	3	2	2.2
	Dam Failure	1	3	2	4	1	2.1
	Levee Failure	1	3	2	4	1	2.1
LOW	Structural Collapse	2	2	1	4	1	1.9
	Nuclear Incident	1	1	2	4	2	1.6

Mitigation goals within this Plan

1. To minimize the risk to human life associated with natural and non-natural hazards.
2. To promote hazard avoidance, especially in floodplains.
3. To reduce the damages and functional loss from natural and non-natural hazards to existing and future public and private assets, including structures, critical facilities, and infrastructure.
4. To preserve and enhance the effectiveness of natural resources, including woodlands, streams, rivers, wetlands, floodplains, and riparian buffers to provide resiliency benefits.
5. To develop, prioritize, and implement cost-effective, long-term actions that will reduce the impacts of natural and non-natural hazards.
6. To improve local regulations to reduce the impacts of natural and non-natural hazards.
7. To enhance planning and emergency response efforts among federal, state, county, and local emergency management personnel to protect public health and safety.
8. To promote public awareness of both the potential impacts of natural and non-natural hazards and actions to reduce those impacts.

The draft 2024 Lehigh Valley Hazard Mitigation Plan is being reviewed by FEMA Region III staff. Once Federal review is complete, the area’s sixty-two (62) municipalities can begin adopting the Plan; the Plan is “in place” once the first municipality adopts it until its next review in spring 2029. The draft Plan is available at the Lehigh County Emergency Management Agency and online at <https://ncem-pa.org/2024-mitigation-plan/>.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

A disaster regardless of the cause (man, nature or climate change) impacts the people affected. The impact on vulnerable populations can be even more devastating. Many of these households do not have insurance or have sufficient insurance to cover an unexpected event such as a fire or flood. Renters can be even more vulnerable than homeowners, as there is a greater possibility they do not carry renters' insurance to protect themselves. Low-income homeowners can be affected due to not having the means to afford insurance. The efforts of the County can play a role in assisting lower income persons make choices in where they live (for instance, not living in flood plains), what they need to have in place to cope with a disaster (insurance), and information on where to turn and what to do if an event is expected.

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Strategic Plan

SP-05 Overview

Strategic Plan Overview

The "Vision" of this Five Year Consolidated Plan is to serve as a consolidated planning document, an application, and a strategic plan for Lehigh County. As part of the Five Year Consolidated Plan, the community must develop goals and objectives. The following strategies with subsequent goals and priorities have been identified for Lehigh County for the period of FY 2024 through FY 2028 for the Community Development Block Grant (CDBG) Program:

HOUSING STRATEGY - HS

Need:

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

Goal:

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

Objectives:

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

HOMELESS STRATEGY - HO**Need:**

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

Goal:

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

Objectives:

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

SPECIAL NEEDS STRATEGY - SN**Need:**

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

Goal:

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

Objectives:

- **SN-1 Housing** – Increase the number of decent, safe, sound, sanitary, accessible, and affordable units in the County for the elderly, persons with disabilities, and other special needs populations.
- **SN-2 Accessibility** – Provide funds for improvements to owner-occupied housing and improve renter-occupied housing by making reasonable accommodations for the physically disabled.

- **SN-3 Social Services** – Promote and support social service programs and facilities for all persons with special needs.
- **SN-4 Removal of Architectural Barriers** – Remove Architectural Barriers which restrict the mobility and access to public facilities and services for persons with physical disabilities.
- **SN-5 Transportation** – Provide funds for improving and expanding transportation and access services for the elderly, persons with disabilities, and persons with other special needs.

COMMUNITY DEVELOPMENT STRATEGY - CD

Need:

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

Goal:

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

Objectives:

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

ECONOMIC DEVELOPMENT STRATEGY - ED**Need:**

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

Goal:

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

Objectives:

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

ADMINISTRATION, MANAGEMENT, AND PLANNING STRATEGY - AMP**Need:**

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

Goal:

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

Objectives:

- **AMP-1 General Administration** – Provide experienced management and oversight to maintain efficient and effective administration of the federal and state grant programs.

- **AMP-2 Staffing** – Hire and retain professional staff and support personnel to provide good management of the programs and activities.
- **AMP-3 Planning** – Provide planning for special studies, environmental review records, fair housing choice activities, promoting Section 3 enterprises, training and outreach, and compliance with federal, state and local laws and ordinances.

These strategies have been developed as the result of:

- meetings with agencies/organizations,
- community meetings,
- public hearings,
- resident surveys,
- agency/organization surveys,
- consultations with County departments and key stakeholders, and
- Needs Assessment and Market Analysis of the Five Year Consolidated Plan.

The principles of the FY 2024-2028 Five Year Consolidated Plan are as follows:

- **Assist** - by developing comprehensive strategies to support and assist those residents who are low- and moderate-income.
- **Involve** - the community and provide opportunities for residents to have input in the planning process and preparation of the plans.
- **Collaborate** - between public, private, and non-profit agencies and organizations to ensure that activities and services will be efficient and effective.
- **Leverage** - Federal funds and local resources to maximize the effectiveness of programs and services throughout the City.
- **Promote** – the involvement of agencies and organizations to undertake specific projects and activities to assist low- and moderate-income persons.

The needs of the Five Year Consolidated Plan were determined based on the following:

- Review of existing reports
- Mapping of data
- Research of existing data on needs of the County
- Consultation with County staff and officials
- Interviews and round table discussions with stakeholders
- Public hearings
- Community meetings
- Resident surveys
- Agency/Organization surveys

The key factors affecting the determination of the Five-Year Strategies and Goals for the Five Year Consolidated Plan include the following:

- Targeting the income households with the greatest needs in the County.
- Identifying areas with the greatest concentration of low-income households.
- Selecting activities/projects that will best address the needs of County residents.
- Utilizing the limited amount of funding available to meet the needs in the County.
- Leveraging additional financial resources to meet the needs of residents in the County.

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

Geographic Area

1.	Area Name:	County Wide
	Area Type:	Local Target area
	Other Target Area Description:	Low- and Moderate-Income Areas
	HUD Approval Date:	
	% of Low/ Mod:	28.39%
	Revital Type:	Comprehensive
	Other Revital Description:	

Table 44 - Geographic Priority Areas

General Allocation Priorities

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

Lehigh County will allocate its CDBG funds to principally benefit low- and moderate-income persons. At least 70% of all the County’s CDBG funds are budgeted for activities which principally benefit low- and moderate-income persons. The following guidelines for allocating CDBG and HOME funds will be used by the County for the FY 2024-2028 Program Years:

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

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

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

The proposed activities and projects for FY 2024-2028 are located in areas of the County with the highest percentages of low- and moderate-income persons, and those block groups with a higher than average percentage of minority persons. The following census tracts and block groups have at least 51% of the households with low- and moderate-incomes:

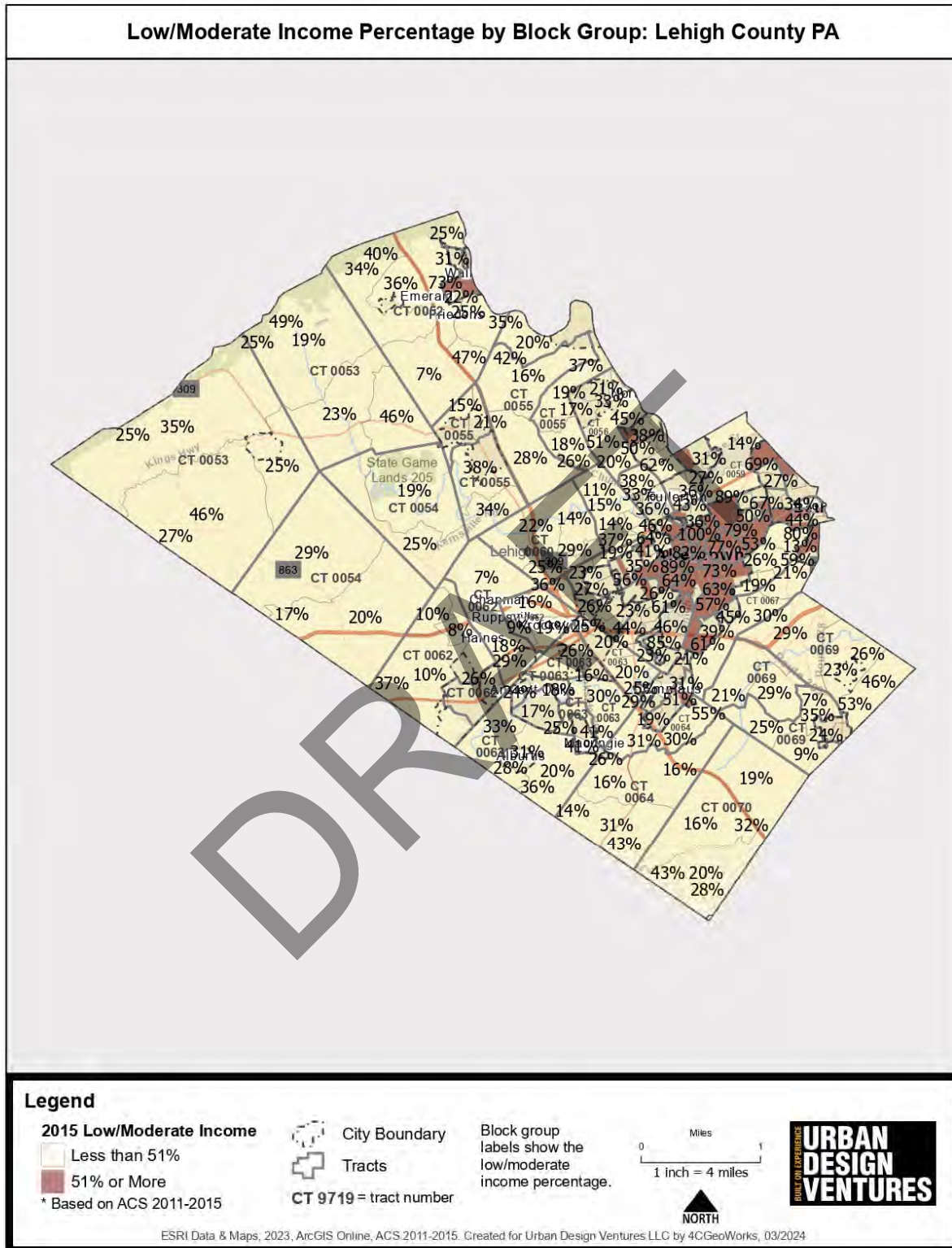
- C.T. 5100, B.G. 2 – Slatington Borough (54.14% LMI)
- C.T. 5100, B.G. 4 – Slatington Borough (72.67% LMI)
- C.T. 5602, B.G. 1 – Whitehall Township (51.12% LMI)
- C.T. 5703, B.G. 3 – Whitehall Township (58.55% LMI)
- C.T. 5704, B.G. 2 – Whitehall Township (56.69% LMI)
- C.T. 5901, B.G. 4 – Catasauqua Borough (61.10% LMI)
- C.T. 5901, B.G. 5 – Catasauqua Borough (62.07% LMI)
- C.T. 6500, B.G. 2 – Emmaus Borough (54.60% LMI)
- C.T. 6800, B.G. 1 – Fountain Hill Borough (70.16% LMI)
- C.T. 6800, B.G. 2 – Fountain Hill Borough (59.14% LMI)
- C.T. 6800, B.G. 4 – Fountain Hill Borough (52.04% LMI)

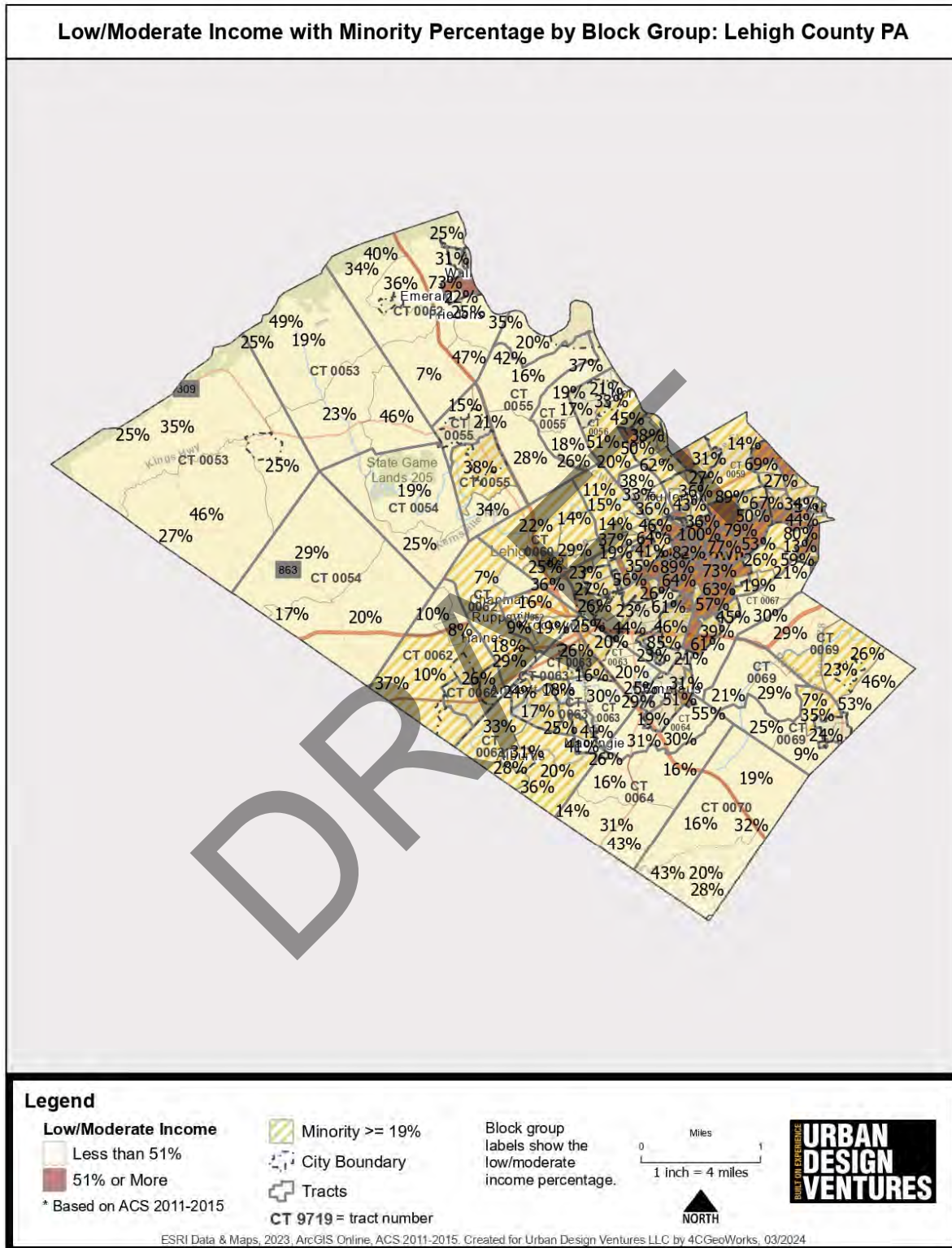
Additionally, because Lehigh County is an exception grantee and all Census Tracts where at least 38.29% of households with low- and moderate-incomes are CDBG eligible, the following Census Tracts and Block Groups are eligible:

- C.T. 5200, B.G. 1 – Washington Township (39.62% LMI)
- C.T. 5200, B.G. 2 – Washington Township (41.52% LMI)
- C.T. 5200, B.G. 3 – Washington Township (46.51% LMI)
- C.T. 5301, B.G. 2 – Heidelberg Township (46.23% LMI)
- C.T. 5302, B.G. 3 – Lynn Township (45.65% LMI)
- C.T. 5504, B.G. 3 – Washington Township (46.51% LMI)
- C.T. 5506, B.G. 2 – North Whitehall Township (38.29% LMI)
- C.T. 5602, B.G. 3 – Whitehall Township (49.67% LMI)
- C.T. 5602, B.G. 4 – Whitehall Township (39.52% LMI)
- C.T. 5702, B.G. 2 – Whitehall Township (40.44% LMI)
- C.T. 5702, B.G. 3 – Whitehall Township (44.48% LMI)
- C.T. 5703, B.G. 2 – Whitehall Township (42.94% LMI)

- C.T. 5704, B.G. 1 – Whitehall Township (46.21% LMI)
- C.T. 5800, B.G. 1 – Coplay Borough (44.76% LMI)
- C.T. 5800, B.G. 2 – Coplay Borough (41.60% LMI)
- C.T. 5800, B.G. 3 – Coplay Borough (45.30% LMI)
- C.T. 5901, B.G. 1 – Catasauqua Borough (41.36% LMI)
- C.T. 5902, B.G. 1 – Hanover Township (47.52% LMI)
- C.T. 6001, B.G. 2 – South Whitehall Township (39.20% LMI)
- C.T. 6303, B.G. 1 – Macungie Borough (41.25% LMI)
- C.T. 6303, B.G. 3 – Macungie Borough (41.15% LMI)
- C.T. 6500, B.G. 3 – Emmaus Borough (50.53% LMI)
- C.T. 6701, B.G. 3 – Salisbury Township (45.42% LMI)
- C.T. 6703, B.G. 3 – Salisbury Township (44.13% LMI)
- C.T. 6903, B.G. 2 – Upper Saucon Township (45.87% LMI)

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

Priority Needs

1.	Priority Need Name	HS - Housing Priority
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly
	Geographic Areas Affected	County Wide
	Associated Goals	HS-1 Housing Development HS-2 Homeownership HS-3 Housing Rehabilitation HS-4 Rent and Utility Assistance HS-5 Fair Housing HS-6 Housing Supportive Services
	Description	Improve, preserve, and expand the supply of affordable housing for low- and moderate-income persons and families in Lehigh County.
	Basis for Relative Priority	The County has been experiencing a growth in population and an influx of lower income persons which has created a shortage in housing, especially affordable housing.
		Priority Need Name

2.	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	County Wide
	Associated Goals	HO-1 Housing Opportunities HO-2 Continuum of Care HO-3 Support and Management Services HO-4 Homeless Prevention
	Description	Improve the living conditions and services for homeless persons and families in Lehigh County.
	Basis for Relative Priority	The County is situated at the crossroads of major highways and the expanding metropolitan area of the East Coast which has brought an influx of homeless and at risk of homelessness persons into the area.
3.	Priority Need Name	SN - Special Needs Priority
	Priority Level	Low

<p>Population</p>	<p>Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development</p>
<p>Geographic Areas Affected</p>	<p>County Wide</p>
<p>Associated Goals</p>	<p>SN-1 Housing SN-2 Accessibility SN-3 Social Services SN-4 Removal of Architectural Barriers SN-5 Transportation</p>
<p>Description</p>	<p>Improve, preserve, and expand facilities for persons with special needs and the disabled in Lehigh County.</p>
<p>Basis for Relative Priority</p>	<p>The County is experiencing an increase in the number of persons aging in place, elderly, persons with physical disabilities, developmentally delayed persons, etc. There is a need to improve living standards for persons with special needs by increasing and expanding public services and public facilities.</p>
<p>4. Priority Need Name</p>	<p>CD - Community Development Priority</p>
<p>Priority Level</p>	<p>High</p>
<p>Population</p>	<p>Extremely Low Low Moderate Large Families Families with Children Elderly Non-housing Community Development</p>

Geographic Areas Affected	County wide
Associated Goals	CD-1 Community Infrastructure CD-2 Community Facilities CD-3 Public Services CD-4 Food Programs CD-5 Clearance/Demolition CD-6 Public Safety CD-7 Transportation
Description	Improve, preserve, and create new public and community facilities, infrastructure, and public services to ensure the quality of life for all residents of Lehigh County.
Basis for Relative Priority	The County’s infrastructure, community facilities and public services are being strained by its population growth, increased demand for services, and the age of infrastructure and facilities. There is a need to improve, preserve, and create public facilities and infrastructure to support the growing population.
5. Priority Need Name	ED - Economic Development Priority
Priority Level	Low
Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Non-housing Community Development
Geographic Areas Affected	County Wide

	Associated Goals	ED-1 Employment ED-2 Financial Assistance ED-3 Revitalization ED-4 Incentives ED-5 Coordination and Cooperation
	Description	Increase and promote job creation, job retention, self-sufficiency, education, job training, technical assistance, and economic empowerment of low- and moderate-income residents of Lehigh County.
	Basis for Relative Priority	The local economy in the County has been expanding, however, there is a need for job training and services to meet the employment needs of companies.
6.	Priority Need Name	AMP - Administration, Management, and Planning
	Priority Level	High

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Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
Geographic Areas Affected	County Wide
Associated Goals	AMP-1 General Administration AMP-2 Staffing AMP-3 Planning
Description	Provide administration, management, and planning services to efficiently and effectively operate federal and state grant programs.
Basis for Relative Priority	There is a continuing need for planning, administration, management, and oversight of Federal, state, and local funded programs.

Table 45 – Priority Needs Summary

Narrative (Optional)

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

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

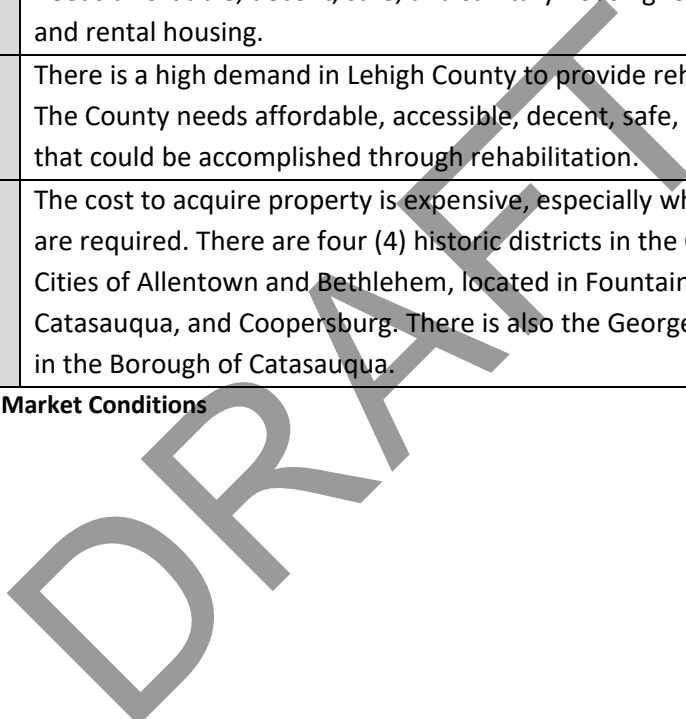
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SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

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

Table 46 – Influence of Market Conditions



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

Introduction

Lehigh County is receiving \$1,241,195 in CDBG funds and \$457,582.73 in HOME funds. The program year goes from October 1st through September 30th of each year. These funds will be used to address the following priority needs:

- Housing (HS);
- Homeless (HO);
- Other Special Needs (SN);
- Community Development (CD);
- Economic Development (ED); and
- Administration, Management, and Planning (AMP).

The accomplishments of these projects/activities will be reported in the FY 2024 Consolidated Annual Performance and Evaluation Report (CAPER).

The expected amount of Federal funds available for the remainder of the Five-Year Consolidated Plan is based on the FY 2024 Federal Allocation times five (5) years, this amount does not include program income.

- **FY 2024** - CDBG = \$1,241,195 / HOME = \$457,583
- **FY 2025** - CDBG = \$1,241,195 / HOME = \$457,583
- **FY 2026** - CDBG = \$1,241,195 / HOME = \$457,583
- **FY 2027** - CDBG = \$1,241,195 / HOME = \$457,583
- **FY 2028** - CDBG = \$1,241,195 / HOME = \$457,583
- **Totals** - CDBG = **\$6,205,975** / HOME = **\$2,287,915**

The yearly accomplishments of these projects/activities are reported in the FY 2024 Consolidated Annual Performance and Evaluation Report (CAPER) and then annually thereafter for the entire FY 2024-2028 Five Year Consolidated Plan period.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$1,241,195.00	0	0	\$1,241,195.00	\$4,964,780.00	20 projects/activities were funded based on FY 2024 CDBG allocations.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$457,582.73	0	0	\$457,582.73	\$1,830,332.27	3 projects/activities were funded based on FY 2024 HOME allocations.

Table 47 - Anticipated Resources

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

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

- Supportive Housing Program
- Low-Income Housing Tax Credit Program (LIHTC)
- Section 8 Rental Assistance Program
- Shelter Plus Care
- Public Housing Development

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

- **Lehigh County Affordable Housing Trust Funds (AHTF)** - The Pennsylvania Optional County Affordable Housing Trust Funds Act of 1992 (Act 137), allows counties to raise revenues for affordable housing efforts by increasing the fees charged by the Recorder of Deeds Office for recording deeds and mortgages. The County raised the fee from \$13 to \$26 per document. Affordable Housing Trust Funds revenue is used to fund affordable housing initiatives and up to 15 percent may be used for the administrative costs to implement the initiatives. Eligible activities include using the revenues as the local matching funds to secure Federal and State Funds, construction or rehabilitation financing, housing related services, match for other State or Federal funds, and supporting first-time homebuyer second mortgage programs.
- **Continuum of Care Grant** - Lehigh County is part of the Lehigh Valley Regional Housing Advisory Board. This is a two (2) county region that applies for Continuum of Care funds each year. In FY 2023, the Lehigh Valley received funding for fourteen (14) projects totaling \$4,277,259.00 for support services and permanent supportive housing projects throughout the region. Of the fourteen (14) projects funded, eleven (12) were Tier 1 awards totaling \$3,870,386, and three (3) were Tier 2 awards totaling \$406,873. HUD will contract with these agencies during the FY 2024 program year.
- **Emergency Solutions Grant (ESG) Funds** - Lehigh County will apply for ESG grants from the Pennsylvania Department of Community and Economic Development.
- Other federal funds that may be used in support of housing, community development, and economic development during FY 2024 include loans through HUD's Section 108 Loan Program, Brownfields Economic Development Initiative (BEDI) grants, and HUD Supportive Housing Program.

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

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

Discussion

The Continuum of Care allocated FY 2023 funding to the following projects under its multi-year program:

The CoC was awarded \$3,870,386 as part of the Tier 1 awards:

- Lehigh County Conference of Churches – Outreach and Case Management for the Disabled, Chronically Homeless - \$71,545
- Lehigh County Conference of Churches – Pathways Permanent Supportive Housing Consolidation - \$1,097,370
- Lehigh County Conference of Churches – Pathways Rapid Rehousing - \$390,252
- Lehigh County Housing Authority – LCHA S+C 2022 - \$241,210
- Valley Housing Development Corporation – VHDC SHP #2/3 2022 - \$403,265
- New Bethany, Inc. DBA New Bethany Ministries – New Bethany Rapid Rehousing - \$135,597
- Northampton County Housing Authority – NCHA S+C 2022 - \$100,779
- The Salvation Army, a New York Corporation – Allentown Hospitality House Permanent Housing Program - \$184,502
- Third Street Alliance for Women and Children – Lehigh Valley Rapid Re-Housing Program - \$387,700
- Valley Youth House Committee, Inc. – Lehigh Valley RRH for Families - \$322,472
- Valley Youth House Committee, Inc. – TH-RRH for Lehigh Valley Youth - \$535,694

The CoC was awarded \$406,873 as part of the Tier 2 awards:

- Resources for Human Development, Inc. – LV ACT Housing Supports - \$229,840
- Resources for Human Development, Inc. – LV ACT Housing Supports – Expansion - \$70,000
- Valley Youth House Committee, Inc. – TH-RRH for Lehigh Valley Youth – Expansion - \$107,033

SP-40 Institutional Delivery Structure – 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Lehigh County	Government agency	Planning	Jurisdiction
Lehigh County Housing Authority	PHA	Public Housing Affordable housing-ownership Affordable housing-rental Planning	Region
Eastern PA Continuum of Care	Continuum of Care	Affordable housing-rental Homelessness Non-homeless special needs Community development: public services Planning	Region
Redevelopment Authority of Lehigh County	Redevelopment authority	Affordable housing-ownership Community development: neighborhood improvements Community development: economic development Planning	Region
Lehigh County Conference of Churches	Non-profit organization	Homelessness Community development: public services	Region
Valley Youth House	Non-profit organization	Homelessness Non-homeless special needs	Region

Turning Point of the Lehigh Valley	Non-profit organization	Homelessness Non-homeless special needs	Region
Lehigh Valley Health Network	Regional organization	Non-homeless special needs Community development: public services	Region
Aspire to Autonomy (ASPIRE)	Non-profit organization	Non-homeless special needs	Region
Black Heritage Association of the Lehigh Valley	Non-profit organization	Community development: economic development	Region
Community Action Lehigh Valley	Non-profit organization	Affordable housing- rental Homelessness Community development: public services Community development: economic development Planning	Region
Communities in Schools of Eastern Pennsylvania	Non-profit organization	Community development: public services Community development: economic development Planning	Region
Lehigh Career & Technical Institute	Public institution	Community development: economic development	Region
Lehigh Valley Center for Independent Living	Non-profit organization	Non-homeless special needs	Region

Manito Life Center	Non-profit organization	Community development: public services	Region
Meals on Wheels	Non-profit organization	Community development: public services	Region
North Penn Legal Services	Non-profit organization	Affordable housing- rental Community development: public services Planning	Region

Table 48 - Institutional Delivery Structure

Assessment of Strengths and Gaps in the Institutional Delivery System

The following services are targeted to the homeless:

- The Lehigh County Conference of Churches provides food for homeless people and families in conjunction with Catholic Charities. Both organizations also provide shelter for homeless people.
- Valley Youth House serves unaccompanied youth in the Lehigh Valley. They offer shelter for youth up to the age of 18.
- Turning Point of the Lehigh Valley provides shelter for domestic violence victims in Lehigh County. They provide Emergency Shelter and Rapid Rehousing services for victims and their families.

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

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

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

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

Table 49 - Homeless Prevention Services Summary

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

Persons with HIV/AIDS and their families comprise a small percentage of the County’s overall population, but that population is often more impoverished than the remainder of the County. The Point in Time Count for Lehigh County in 2024 counted 4 homeless persons with HIV/AIDS that were either sheltered or unsheltered, up from 0 persons in 2023 and 1 person in 2022.

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

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

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

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

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

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

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1.	HS-1 Housing Development	2024	2028	Affordable Housing	County Wide	Housing Priority	CDBG: \$0 HOME: \$1,885,124.73	Homeowner Housing Added: 6 Household Housing Units Rental units constructed: 6 Household Housing Unit
2.	HS-2 Homeownership	2024	2028	Affordable Housing	County Wide	Housing Priority	CDBG: \$0 HOME: \$174,000	Direct Financial Assistance to Homebuyers: 12 Households Assisted
3.	HS-3 Housing Rehabilitation	2024	2028	Affordable Housing	County Wide	Housing Priority	CDBG: \$309,640 HOME: \$0	Homeowner Housing Rehabilitated: 17 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4.	HS-4 Rent and Utility Assistance	2024	2028	Affordable Housing	County Wide	Housing Priority	CDBG: \$20,000 HOME: \$0	Public service activities for Low/Moderate Income Housing Benefit: 20 Households Assisted
5.	HS-5 Fair Housing	2024	2028	Affordable Housing	County Wide	Housing Priority	CDBG: \$20,000 HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 160 Persons Assisted Other 5 Others
6.	HS-6 Housing Supportive Services	2024	2028	Affordable Housing	County Wide	Housing Priority	CDBG: \$60,000 HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 160 Persons Assisted

<p>7.</p>	<p>HO-1 Housing Opportunities</p>	<p>2024</p>	<p>2028</p>	<p>Homeless</p>	<p>County Wide</p>	<p>Homeless Priority</p>	<p>CDBG: \$0</p>	<p>Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted</p> <p>Tenant-based rental assistance / Rapid Rehousing: 0 Households Assisted</p> <p>Homeless Person Overnight Shelter: 0 Persons Assisted</p> <p>Overnight/Emergency Shelter/Transitional Housing Beds added: 0 Beds</p> <p>Homelessness Prevention: 0 Persons Assisted</p> <p>Other: 0 Other</p>
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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8.	HO-2 Continuum of Care	2024	2028	Homeless	County Wide	Homeless Priority	CDBG: \$0	Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted Homeless Person Overnight Shelter: 0 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 0 Beds Homelessness Prevention: 0 Persons Assisted Other: 0 Other

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9.	HO-3 Support and Management Services	2024	2028	Homeless	County Wide	Homeless Priority	CDBG: \$0	Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted Homeless Person Overnight Shelter: 0 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 0 Beds Homelessness Prevention: 0 Persons Assisted Other: 0 Other

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10.	HO-4 Homeless Prevention	2024	2028	Homeless	County Wide	Homeless Priority	CDBG: \$0	Tenant-based rental assistance / Rapid Rehousing: 0 Households Assisted Homelessness Prevention: 0 Persons Assisted Other: 0 Other

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11.	SN-1 Housing	2024	2028	Non-Homeless Special Needs	County Wide	Special Needs Priority	CDBG: \$0	Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted Rental units constructed: 0 Household Housing Unit Homeowner Housing Added: 0 Household Housing Unit

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
12.	SN-2 Accessibility	2024	2028	Non-Homeless Special Needs	County Wide	Special Needs Priority	CDBG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted Rental units rehabilitated: 0 Household Housing Unit Homeowner Housing Rehabilitated: 0 Household Housing Unit Other: 0 Other

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
13.	SN-3 Social Services	2024	2028	Non-Homeless Special Needs	County Wide	Special Needs Priority	CDBG: \$74,715	Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted Public service activities other than Low/Moderate Income Housing Benefit: 125 Persons Assisted Other: 0 Other
14.	SN-4 Removal of Architectural Barriers	2024	2028	Non-Homeless Special Needs	County Wide	Special Needs Priority	CDBG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted Other: 0 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
15.	SN-5 Transportation	2024	2028	Non-Homeless Special Needs	County Wide	Special Needs Priority	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted Other: 0 Other
16.	CD-1 Community Infrastructure	2024	2028	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$3,399,480	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 102,034 Persons Assisted Other: 5 Other

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
17.	CD-2 Community Facilities	2024	2028	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$220,515	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 20,000 Persons Assisted Other: 5 Other
18.	CD-3 Public Services	2024	2028	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$240,000	Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted Public service activities other than Low/Moderate Income Housing Benefit: 785 Persons Assisted Other: 0 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
19.	CD-4 Food Programs	2024	2028	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$45,000	Public service activities other than Low/Moderate Income Housing Benefit: 180 Persons Assisted Other: 0 Other
20.	CD-5 Clearance / Demolition	2024	2028	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$375,000	Buildings Demolished: 10 Buildings
21.	CD-6 Public Safety	2024	2028	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted Other: 0 Other
22.	CD-7 Transportation	2024	2028	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted Other: 0 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
23.	ED-1 Employment	2024	2028	Economic Development	County Wide	Economic Development Priority	CDBG: \$275,000	Public service activities other than Low/Moderate Income Housing Benefit: 175 Persons Assisted Jobs created/retained: 0 Jobs Businesses assisted: 0 Businesses Assisted
24.	ED-2 Financial Assistance	2024	2028	Economic Development	County Wide	Economic Development Priority	CDBG: \$0	Businesses assisted: 0 Businesses Assisted Other: 0 Other
25.	ED-3 Revitalization	2024	2028	Economic Development	County Wide	Economic Development Priority	CDBG: \$0	Businesses assisted: 0 Businesses Assisted Other: 0 Other
26.	ED-4 Incentives	2024	2028	Economic Development	County Wide	Economic Development Priority	CDBG: \$0	Businesses assisted: 0 Businesses Assisted Other: 0 Other
27.	ED-5 Coordination and Cooperation	2024	2028	Economic Development	County Wide	Economic Development Priority	CDBG: \$0	Businesses assisted: 0 Businesses Assisted Other: 0 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
28.	AMP-1 General Administration	2024	2028	Administration, Planning, and Management	County Wide	Administration, Management, and Planning	CDBG: \$1,127,695 HOME: \$228,790	Other: 10 Others
29.	AMP-2 Staffing	2024	2028	Administration, Planning, and Management	County Wide	Administration, Management, and Planning	CDBG: \$0	Other: 0 Other
30.	AMP-3 Planning	2024	2028	Administration, Planning, and Management	County Wide	Administration, Management, and Planning	CDBG: \$93,500	Other: 5 Others

Table 50 – Goals Summary

Goal Descriptions

1.	Goal Name	HS-1 Housing Development
	Goal Description	Increase the number of decent safe, sanitary, accessible, and affordable housing units in the County, both for owner-occupied and rental-occupied housing.
2.	Goal Name	HS-2 Homeownership
	Goal Description	Increase the opportunities for homeownership for low- and moderate-income households through downpayment/closing cost assistance, and housing counseling services.

3.	Goal Name	HS-3 Housing Rehabilitation
	Goal Description	Promote and assist low- and moderate-income households in the preservation of existing owner-occupied and renter-occupied housing in the County.
4.	Goal Name	HS-4 Rent and Utility Assistance
	Goal Description	Promote housing stability through rental assistance, utility payments, and deposits for low- and moderate-income tenants who are at risk of becoming homeless.
5.	Goal Name	HS-5 Fair Housing
	Goal Description	Affirmatively further fair housing by promoting and informing households on their rights and educating landlords, realtors, mortgage companies, sellers, etc. on fair housing practices which will reduce discrimination in housing.
6.	Goal Name	HS-6 Housing Supportive Services
	Goal Description	Promote and assist low- and moderate-income households to locate and/or remain in affordable housing through housing counseling and supportive services.
7.	Goal Name	HO-1 Housing Opportunities
	Goal Description	Increase the housing opportunities and living conditions of persons and families who are homeless or who are at risk of homelessness.
8.	Goal Name	HO-2 Continuum of Care
	Goal Description	Support the efforts and resources of the Lehigh County Continuum of Care to promote housing opportunities for emergency shelters, transitional housing, and permanent supportive housing for the homeless and those who are at risk of becoming homeless.
9.	Goal Name	HO-3 Support and Management Services
	Goal Description	Provide funding for supportive and management services to governmental and non-profit agencies and organizations to assist persons who are homeless or who are at risk of becoming homeless.

10.	Goal Name	HO-4 Homeless Prevention
	Goal Description	Provide funding for programs and activities to address eviction and unfair housing practices which may contribute to homelessness.
11.	Goal Name	SN-1 Housing
	Goal Description	Increase the number of decent, safe, sound, sanitary, accessible and affordable units in the County for the elderly, persons with disabilities, and other special needs populations.
12.	Goal Name	SN-2 Accessibility
	Goal Description	Provide funds for improvements to owner-occupied housing and improve renter-occupied housing by making reasonable accommodations for the physically disabled.
13.	Goal Name	SN-3 Social Services
	Goal Description	Promote and support social service programs and facilities for all persons with special needs.
14.	Goal Name	SN-4 Removal of Architectural Barriers
	Goal Description	Remove Architectural Barriers which restrict the mobility and access to public facilities and services for persons with physical disabilities.
15.	Goal Name	SN-5 Transportation
	Goal Description	Provide funds for improving and expanding transportation and access services for the elderly, persons with disabilities, and persons with other special needs.
16.	Goal Name	CD-1 Community Infrastructure
	Goal Description	Improve and upgrade roads, bridges, utilities, sewer systems, ADA accessibility, etc. to meet the increasing demand.
17.	Goal Name	CD-2 Community Facilities
	Goal Description	Improve, upgrade, and expand parks, playgrounds, recreational facilities, libraries, public buildings, etc. to meet the needs of the population.

18.	Goal Name	CD-3 Public Services
	Goal Description	Provide funding to improve, expand, and create public services for social and welfare programs so they are available to meet the needs of low- and moderate-income residents in the County.
19.	Goal Name	CD-4 Food Programs
	Goal Description	Provide assistance for food and nutritional programs to address the needs of the unemployed, underemployed, elderly, disabled, and homeless individuals.
20.	Goal Name	CD-5 Clearance/Demolition
	Goal Description	Provide funding to improve, expand, and create public services for social and welfare programs so they are available to meet the needs of low- and moderate-income residents in the County.
21.	Goal Name	CD-6 Public Safety
	Goal Description	Provide funding to improve, expand, and create public services for social and welfare programs so they are available to meet the needs of low- and moderate-income residents in the County.
22.	Goal Name	CD-7 Transportation
	Goal Description	Provide funding to improve, expand, and create public services for social and welfare programs so they are available to meet the needs of low- and moderate-income residents in the County.
23.	Goal Name	ED-1 Employment
	Goal Description	Provide funding to support job training, retention, and educational programs to address the need for a well-trained labor force.
24.	Goal Name	ED-2 Financial Assistance
	Goal Description	Provide funds for new development, expansion, and equipment purchases through economic development programs.
25.	Goal Name	ED-3 Revitalization
	Goal Description	Provide assistance in acquiring land and making sites available for redevelopment to promote new development in areas of the County that need to be revitalized.

26.	Goal Name	ED-4 Incentives
	Goal Description	Support local, state, and federal tax breaks, tax credits, development bonuses and planning initiatives to create orderly and positive economic development throughout the County.
27.	Goal Name	ED-5 Coordination and Cooperation
	Goal Description	Promote, support and form public and private partnerships to improve employee access to jobs through public transportation and the supply of worker housing throughout the County.
28.	Goal Name	AMP-1 General Administration
	Goal Description	Provide experienced management and oversight to maintain efficient and effective administration of the federal and state grant programs.
29.	Goal Name	AMP-2 Staffing
	Goal Description	Hire and retain professional staff and support personnel to provide good management of the programs and activities.
30.	Goal Name	AMP-3 Planning
	Goal Description	Provide planning for special studies, environmental review records, fair housing choice activities, promoting Section 3 enterprises, training and outreach, and compliance with federal, state and local laws and ordinances.

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

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

Activities to Increase Resident Involvements

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

Family Self-Sufficiency (FSS) programs are provided to Section 8 Housing Choice Voucher Holders and public housing tenants. FSS program residents work with a case manager to develop goals that will, over a five (5) year period, lead to self-sufficiency. These goals may include education, specialized training, job readiness, job placement activities, and career advancement objectives. The Lehigh County Housing Authority has selected residents to access and review its Annual Action Plan when available.

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

The Lehigh County Housing Authority is not designated as troubled.

Plan to remove the 'troubled' designation

Not Applicable.

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

Barriers to Affordable Housing

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

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SP-60 Homelessness Strategy – 91.215(d)

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

The Eastern PA Continuum of Care operates a Coordinated Entry System, which was piloted in the Lehigh Valley and expanded to all 33 counties of the CoC, to ensure that those at-risk of homelessness or, who are experiencing homelessness, are connected to resources and services. The system ensures the management of access, assessment, prioritization, and referral to housing and social services for any person experiencing or at imminent risk of homelessness throughout the region. A call center operated by PA 2-1-1 provides live voice intake, and of the 33 access facilities within the CoC there are 28 access sites that provide face-to-face intake. Service providers are trained in housing first, the VI-SPDAT assessment, and other best practices to assist homeless persons in receiving proper services. The CoC conducts mobile outreach for vulnerable populations and includes ESL translation services with its intake services, as well as access for those who are hearing impaired. Coordinated Entry processes also provide information about service needs and identify gaps to help communities plan their assistance and resources.

Outreach to homeless persons is conducted by service providers. Organizations like the Lehigh County Conference of Churches will contact the homeless individuals that use the emergency shelters during weather advisory. Lehigh County Conference of Churches will also make outreach to the chronically homeless that live in communities and attempt to assess them. This outreach, combined with case management, was funded by the CoC in FY 2023.

Youth homelessness is a problem in the Lehigh Valley area. It is estimated that nearly 10% of the homeless people in the area fall into the 18-24 age group. There is a need for a year-round shelter for this age group, as Valley Youth House does not serve youth over the age of 18. Focused outreach has been conducted by the CoC on this age group in partnership with Valley Youth House, and this population continues to be a priority for Lehigh County. The Bradbury-Sullivan LGBT Community Center partners with the Regional Homeless Advisory Board to provide housing and services to youth experiencing homelessness, as well as toiletry supplies and other products to homeless and housing-insecure LGBT youth in the Lehigh Valley. Valley Youth House is providing quarterly youth training to focus on educating providers in best practices for youth, including LGBT youth.

Addressing the emergency and transitional housing needs of homeless persons

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

As of the 2024 Eastern PA CoC Housing Inventory Count, the shelter and transitional housing that is available in Lehigh County included the following:

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

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

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

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

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

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

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

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

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

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

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

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

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

According to the 2018-2022 American Community Survey, approximately 66.4% of the County's housing stock (99,571 housing units) was built prior to 1979. Therefore, the possible incidence and associated hazards of lead-based paint in the housing stock is high. The reported cases of childhood lead poisoning are low, but state health department representatives emphasize that the number of unreported/undetected cases of childhood lead poisoning is unknown and the low number of reported cases should not be misconstrued as evidence that lead poisoning is not more widespread.

According to the Pennsylvania 2021 Childhood Lead Surveillance Annual Report (published April 2023), of the 156,018 Pennsylvania children under age 5 who were tested for lead exposure, 2.15% (3,353) had a confirmed elevated blood lead level (BLL) of ≥ 5 $\mu\text{g}/\text{dL}$ (micrograms/deciliters) and 0.96% (1,497) were confirmed to have lead poisoning with a BLL of ≥ 10 $\mu\text{g}/\text{dL}$. 4,099 of Lehigh County's 26,824 children under 5 years of age were tested for lead. Of those tested, 1.66% of children aged 0-71 months (68 children) were confirmed to have an elevated BLL between 5 and 9.9 $\mu\text{g}/\text{dL}$ and 1.10% of children aged 0-71 months (45 children) were confirmed to have lead poisoning with a BLL of 10 $\mu\text{g}/\text{dL}$ or higher.

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

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

Rehabilitation Programs:

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

- Applicants for rehabilitation funding receive the required lead-based paint information and understand their responsibilities.
- Staff properly determines whether proposed projects are exempt from some or all lead-based paint requirements.
- The level of federal rehabilitation assistance is properly calculated and the applicable lead-based paint requirements determined.
- Properly qualified personnel perform risk management, paint testing, lead hazard reduction, and clearance services when required.
- Required lead hazard reduction work and protective measures are incorporated into project rehabilitation specifications.

- Risk assessment, paint testing, lead hazard reduction, and clearance work are performed in accordance with the applicable standards established in 24 CFR Part 35.
- Required notices regarding lead-based paint evaluation, presumption, and hazard reduction are provided to occupants and documented.
- Program documents establish the rental property owner's responsibility to perform and document ongoing lead-based paint maintenance activities, when applicable.
- Program staff monitors owner compliance with ongoing lead-based paint maintenance activities, when applicable.

Homeownership Programs:

Lehigh County will ensure that:

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

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

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

The lead-based paint treatment program will be administered by the County staff and shall include the following responsibilities:

- Financial management and recordkeeping of all funds.
- Qualification of households.
- Inspection and treatment of non-lead aspects of the projects.
- Procurement of third-party service contractors.
- Relocation of households where required.
- Implementation of the bidding process.
- Awarding of contracts.
- Monitoring of ongoing projects.

- Preparation of progress and final payments to contractors.
- Overall responsibility for program compliance with HUD 24 CFR Parts 905, 941, 965, and 968.

The scope of work for third-party contractors shall include:

- Initial lead risk assessments.
- Testing of all painted surfaces in structures which include testing by approved XRF and Spectrum Analyzers and, where required, laboratory analysis (TCLP).
- Testing reports.
- Preparation of specifications for lead reduction and/or abatement treatment.
- Monitoring of the treatment process.
- Disposal of hazardous materials to approved landfill facilities.
- Medical examinations where necessary.
- Post treatment testing.
- Certifications.

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

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

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

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

In Lehigh County, the Community Action Committee of the Lehigh Valley (CACLV) is the official anti-poverty agency. CACLV provides rent and utility assistance, case management, and counseling services to assist with financial management, benefit entitlement assistance, home weatherization to reduce utility costs, furniture and household goods, alcohol and mental health counseling, foreclosure mitigation counseling, child care, transportation to work for up to six (6) months and assistance in purchasing a dependable vehicle, and other various programs that empower low-income households by assisting them to develop the skills needed for independent living.

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

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

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

To assist with economic development and to promote job creation, Lehigh County administers various

programs and supports agencies for economic development:

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

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

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

SP-80 Monitoring – 91.230

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

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

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

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

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

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

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

There are monitoring responsibilities that go beyond the time of completion of various activities. The overall performance of the program relative to the Five-Year Strategic Plan goals is monitored at least bi-annually through the selection of the annual activities and again during the preparation of the Comprehensive Annual Performance and Evaluation Report (CAPER). If it appears that proposed goals are

not being addressed, the County will re-evaluate the goals, project performance and determine the course of action needed to bring the program into compliance.

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Expected Resources

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

Introduction

Lehigh County is receiving \$1,241,195 in CDBG funds and \$457,582.73 in HOME funds. The program year goes from October 1st through September 30th of each year. These funds will be used to address the following priority needs:

- Housing (HS);
- Homeless (HO);
- Other Special Needs (SN);
- Community Development (CD);
- Economic Development (ED); and
- Administration, Management, and Planning (AMP).

The accomplishments of these projects/activities will be reported in the FY 2024 Consolidated Annual Performance and Evaluation Report (CAPER).

The expected amount of Federal funds available for the remainder of the Five-Year Consolidated Plan is based on the FY 2024 Federal Allocation times five (5) years, this amount does not include program income.

- **FY 2024** - CDBG = \$1,241,195 / HOME = \$457,583
- **FY 2025** - CDBG = \$1,241,195 / HOME = \$457,583
- **FY 2026** - CDBG = \$1,241,195 / HOME = \$457,583
- **FY 2027** - CDBG = \$1,241,195 / HOME = \$457,583
- **FY 2028** - CDBG = \$1,241,195 / HOME = \$457,583
- **Totals - CDBG = \$6,205,975 / HOME = \$2,287,915**

The yearly accomplishments of these projects/activities are reported in the FY 2024 Consolidated Annual Performance and Evaluation Report (CAPER) and then annually thereafter for the entire FY 2024-2028 Five Year Consolidated Plan period.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$1,241,195.00	0	0	\$1,241,195.00	\$4,964,780.00	20 projects/activities were funded based on FY 2024 CDBG allocations.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$457,582.73	0	0	\$457,582.73	\$1,830,332.27	3 projects/activities were funded based on FY 2024 HOME allocations.

Table 51 - Expected Resources – Priority Table

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

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

- Supportive Housing Program
- Low-Income Housing Tax Credit Program (LIHTC)
- Section 8 Rental Assistance Program
- Shelter Plus Care
- Public Housing Development

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

- **Lehigh County Affordable Housing Trust Funds (AHTF)** - The Pennsylvania Optional County Affordable Housing Trust Funds Act of 1992 (Act 137), allows counties to raise revenues for affordable housing efforts by increasing the fees charged by the Recorder of Deeds Office for recording deeds and mortgages. The County raised the fee from \$13 to \$26 per document. Affordable Housing Trust Funds revenue is used to fund affordable housing initiatives and up to 15 percent may be used for the administrative costs to implement the initiatives. Eligible activities include using the revenues as the local matching funds to secure Federal and State Funds, construction or rehabilitation financing, housing related services, match for other State or Federal funds, and supporting first-time homebuyer second mortgage programs.
- **Continuum of Care Grant** - Lehigh County is part of the Lehigh Valley Regional Housing Advisory Board. This is a two (2) county region that applies for Continuum of Care funds each year. In FY 2023, the Lehigh Valley received funding for fourteen (14) projects totaling \$4,277,259.00 for support services and permanent supportive housing projects throughout the region. Of the fourteen (14) projects funded, eleven (12) were Tier 1 awards totaling \$3,870,386, and three (3) were Tier 2 awards totaling \$406,873. HUD will contract with these agencies during the FY 2024 program year.
- **Emergency Solutions Grant (ESG) Funds** - Lehigh County will apply for ESG grants from the Pennsylvania Department of Community and Economic Development.
- Other federal funds that may be used in support of housing, community development, and economic development during FY 2024 include loans through HUD's Section 108 Loan Program, Brownfields Economic Development Initiative (BEDI) grants, and HUD Supportive Housing Program.

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

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

Discussion

The Continuum of Care allocated FY 2023 funding to the following projects under its multi-year program:

The CoC was awarded \$3,870,386 as part of the Tier 1 awards:

- Lehigh County Conference of Churches – Outreach and Case Management for the Disabled, Chronically Homeless - \$71,545
- Lehigh County Conference of Churches – Pathways Permanent Supportive Housing Consolidation - \$1,097,370
- Lehigh County Conference of Churches – Pathways Rapid Rehousing - \$390,252
- Lehigh County Housing Authority – LCHA S+C 2022 - \$241,210
- Valley Housing Development Corporation – VHDC SHP #2/3 2022 - \$403,265
- New Bethany, Inc. DBA New Bethany Ministries – New Bethany Rapid Rehousing - \$135,597
- Northampton County Housing Authority – NCHA S+C 2022 - \$100,779
- The Salvation Army, a New York Corporation – Allentown Hospitality House Permanent Housing Program - \$184,502
- Third Street Alliance for Women and Children – Lehigh Valley Rapid Re-Housing Program - \$387,700
- Valley Youth House Committee, Inc. – Lehigh Valley RRH for Families - \$322,472
- Valley Youth House Committee, Inc. – TH-RRH for Lehigh Valley Youth - \$535,694

The CoC was awarded \$406,873 as part of the Tier 2 awards:

- Resources for Human Development, Inc. – LV ACT Housing Supports - \$229,840
- Resources for Human Development, Inc. – LV ACT Housing Supports – Expansion - \$70,000
- Valley Youth House Committee, Inc. – TH-RRH for Lehigh Valley Youth – Expansion - \$107,033

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1.	HS-1 Housing Development	2024	2028	Affordable Housing	County Wide	Housing Priority	CDBG: \$0 HOME: \$411,825	Homeowner Housing Added: 0 Household Housing Units Rental units constructed: 3 Household Housing Unit
2.	HS-3 Housing Rehabilitation	2024	2028	Affordable Housing	County Wide	Housing Priority	CDBG: \$45,014 HOME: \$0	Homeowner Housing Rehabilitated: 3 Household Housing Unit
3.	HS-5 Fair Housing	2024	2028	Affordable Housing	County Wide	Housing Priority	CDBG: \$4,000 HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 32 Persons Assisted Other: 1 Others

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4.	HS-6 Housing Supportive Services	2024	2028	Affordable Housing	County Wide	Housing Priority	CDBG: \$12,000 HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 32 Persons Assisted
5.	SN-3 Social Services	2024	2028	Non-Homeless Special Needs	County Wide	Special Needs Priority	CDBG: \$14,943	Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted Public service activities other than Low/Moderate Income Housing Benefit: 25 Persons Assisted Other: 0 Other

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6.	CD-1 Community Infrastructure	2024	2028	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$668,982	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 22,034 Persons Assisted Other: 1 Other
7.	CD-2 Community Facilities	2024	2028	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$44,103	Other: 1 Other
8.	CD-3 Public Services	2024	2028	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$52,000	Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted Public service activities other than Low/Moderate Income Housing Benefit: 185 Persons Assisted Other: 0 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9.	CD-4 Food Programs	2024	2028	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$15,000	Public service activities other than Low/Moderate Income Housing Benefit: 60 Persons Assisted Other: 0 Other
10.	CD-5 Clearance / Demolition	2024	2028	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$75,000	Buildings Demolished: 2 Buildings
11.	ED-1 Employment	2024	2028	Economic Development	County Wide	Economic Development Priority	CDBG: \$55,000	Public service activities other than Low/Moderate Income Housing Benefit: 35 Persons Assisted Jobs created/retained: 0 Jobs Businesses assisted: 0 Businesses Assisted
12.	AMP-1 General Administration	2024	2028	Administration, Planning, and Management	County Wide	Administration, Management, and Planning	CDBG: \$225,539 HOME: \$45,758	Other: 2 Others

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
13.	AMP-3 Planning	2024	2028	Administration, Planning, and Management	County Wide	Administration, Management, and Planning	CDBG: \$18,700	Other: 1 Other

Table 52 – Goals Summary

Goal Descriptions

1.	Goal Name	HS-1 Housing Development
	Goal Description	Increase the number of decent safe, sanitary, accessible, and affordable housing units in the County, both for owner-occupied and rental-occupied housing.
2.	Goal Name	HS-3 Housing Rehabilitation
	Goal Description	Promote and assist in the preservation of existing owner-occupied and renter-occupied housing in the County.
3.	Goal Name	HS-5 Fair Housing
	Goal Description	Affirmatively further fair housing by promoting and informing households on their rights and educating landlords, realtors, mortgage companies, sellers, etc. on fair housing practices which will reduce discrimination in housing.
4.	Goal Name	HS-6 Housing Supportive Services
	Goal Description	Promote and assist low- and moderate-income households to locate and/or remain in affordable housing through housing counseling and supportive services.
5.	Goal Name	SN-3 Social Services
	Goal Description	Promote and support social service programs and facilities for all persons with special needs.
	Goal Name	CD-1 Community Infrastructure

6.	Goal Description	Improve and upgrade roads, bridges, utilities, sewer systems, ADA accessibility, etc. to meet the increasing demand.
7.	Goal Name	CD-2 Community Facilities
	Goal Description	Improve, upgrade, and expand parks, playgrounds, recreational facilities, libraries, public buildings, etc. to meet the needs of the population.
8.	Goal Name	CD-3 Public Services
	Goal Description	Provide funding to improve, expand, and create public services for social and welfare programs so they are available to meet the needs of low- and moderate-income residents in the County.
9.	Goal Name	CD-4 Food Programs
	Goal Description	Provide assistance for food and nutritional programs to address the needs of the unemployed, underemployed, elderly, disabled, and homeless individuals.
10.	Goal Name	CD-5 Clearance/Demolition
	Goal Description	Remove slum and blighting conditions through the demolition and clearance of buildings and sites that pose a threat to the health, safety, and welfare of surrounding residents.
11.	Goal Name	ED-1 Employment
	Goal Description	Provide funding to support job training, retention, and educational programs to address the need for a well trained labor force.
12.	Goal Name	AMP-1 General Administration
	Goal Description	Provide experienced management and oversight to maintain efficient and effective administration of the federal and state grant programs.
13.	Goal Name	AMP-3 Planning
	Goal Description	Provide planning for special studies, environmental review records, fair housing choice activities, promoting Section 3 enterprises, training and outreach, and compliance with federal, state and local laws and ordinances.

Projects

AP-35 Projects – 91.220(d)

Introduction

Listed below are the FY 2024 CDBG and HOME Activities for Lehigh County:

Projects

#	Project Name	Budget
1.	Aspire to Autonomy, Inc. (ASPIRE) - Mental Health Therapy	\$ 22,000.00
2.	Black Heritage Association of the Lehigh Valley - Section 3 Certification Outreach and Registry	\$ 18,700.00
3.	Communities in Schools of Eastern Pennsylvania - LCTI Support	\$ 25,000.00
4.	Lehigh Career & Technical Institute - Tuition for Low-Income Residents	\$ 30,000.00
5.	Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE)	\$ 14,943.00
6.	Manito Life Center - Therapeutic Riding for At-Risk Adolescents and Adults	\$ 30,000.00
7.	Meals on Wheels - Stable Food Support	\$ 15,000.00
8.	North Penn Legal Services - Fair Housing Outreach	\$ 4,000.00
9.	North Penn Legal Services - Legal Help Project	\$ 12,000.00
10.	New Bethany, Inc. - Kitchen Update and Office Creation	\$ 44,103.00
11.	Community Action Lehigh Valley (CACLV) - Urgent Need Roof and HVAC Replacement Program	\$ 45,014.00
12.	Redevelopment Authority of Lehigh County (RALC) - Blight to Bright	\$ 75,000.00
13.	Coplay Borough - Street Resurfacing	\$ 185,471.00
14.	Emmaus Borough - Curb Cuts	\$ 80,000.00
15.	Macungie Borough - Sanitary Sewer Rehabilitation	\$ 75,000.00
16.	Salisbury Township - Sanitary Sewer Rehabilitation	\$ 59,190.00

17.	Slatington Borough - Willow Street Reconstruction and Curb Cuts	\$ 89,605.00
18.	Slatington Borough - Cherry Street Reconstruction and Curb Cuts	\$ 96,465.00
19.	Slatington Borough - Hill Street Reconstruction	\$ 94,165.00
20.	CDBG Administration	\$ 225,539.00
21.	HOME Administration	\$ 45,758.00
22.	CHDO Set-Aside	\$ 68,638.00
23.	Affordable Housing Project	\$ 343,186.73

Table 53 – CDBG and HOME Project Information

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

Lehigh County has allocated its FY 2024 CDBG and HOME funds to principally benefit low- and moderate-income persons.

- The infrastructure improvement activities are either located in a low- and moderate-income census tract/block group or have a low- and moderate-income service area benefit or clientele over 51% low- and moderate-income.
- The Public Services activities are either located in a low- and moderate-income census area or have a low- and moderate-income services area benefit or clientele.
- The Public Facilities activities are either located in a low- and moderate-income census area or have a low- and moderate-income service area benefit or clientele.
- Demolition of structures that are either located in a low- and moderate-income census area, or fall under removal of slum and blight on a spot basis.
- The housing activities for the first time homebuyers and housing rehabilitation program have an income eligibility criteria, therefore the income requirement restricts funds to low- and moderate-income households throughout the County.
- Economic development projects will either be located in a low- and moderate-income census tract/block group, or a poverty tract greater than 20%, or part of a redevelopment plan, or making 51% of the jobs available to low- and moderate-income population.

The proposed activities and projects for FY 2024-2028 are located in areas of the County with the highest percentages of low- and moderate-income persons, and those block groups with a higher than average percentage of minority persons. The following census tracts and block groups have at least 51% of the households with low- and moderate-incomes:

- C.T. 5100, B.G. 2 – Slatington Borough (54.14% LMI)
- C.T. 5100, B.G. 4 – Slatington Borough (72.67% LMI)
- C.T. 5602, B.G. 1 – Whitehall Township (51.12% LMI)
- C.T. 5703, B.G. 3 – Whitehall Township (58.55% LMI)
- C.T. 5704, B.G. 2 – Whitehall Township (56.69% LMI)
- C.T. 5901, B.G. 4 – Catasauqua Borough (61.10% LMI)
- C.T. 5901, B.G. 5 – Catasauqua Borough (62.07% LMI)
- C.T. 6500, B.G. 2 – Emmaus Borough (54.60% LMI)
- C.T. 6800, B.G. 1 – Fountain Hill Borough (70.16% LMI)
- C.T. 6800, B.G. 2 – Fountain Hill Borough (59.14% LMI)
- C.T. 6800, B.G. 4 – Fountain Hill Borough (52.04% LMI)

Additionally, because Lehigh County is an exception grantee and all Census Tracts where at least 38.29% of households with low- and moderate-incomes are CDBG eligible, the following Census Tracts and Block Groups are eligible:

- C.T. 5200, B.G. 1 – Washington Township (39.62% LMI)
- C.T. 5200, B.G. 2 – Washington Township (41.52% LMI)
- C.T. 5200, B.G. 3 – Washington Township (46.51% LMI)
- C.T. 5301, B.G. 2 – Heidelberg Township (46.23% LMI)
- C.T. 5302, B.G. 3 – Lynn Township (45.65% LMI)
- C.T. 5504, B.G. 3 – Washington Township (46.51% LMI)
- C.T. 5506, B.G. 2 – North Whitehall Township (38.29% LMI)
- C.T. 5602, B.G. 3 – Whitehall Township (49.67% LMI)
- C.T. 5602, B.G. 4 – Whitehall Township (39.52% LMI)
- C.T. 5702, B.G. 2 – Whitehall Township (40.44% LMI)
- C.T. 5702, B.G. 3 – Whitehall Township (44.48% LMI)
- C.T. 5703, B.G. 2 – Whitehall Township (42.94% LMI)
- C.T. 5704, B.G. 1 – Whitehall Township (46.21% LMI)
- C.T. 5800, B.G. 1 – Coplay Borough (44.76% LMI)
- C.T. 5800, B.G. 2 – Coplay Borough (41.60% LMI)
- C.T. 5800, B.G. 3 – Coplay Borough (45.30% LMI)
- C.T. 5901, B.G. 1 – Catasauqua Borough (41.36% LMI)
- C.T. 5902, B.G. 1 – Hanover Township (47.52% LMI)
- C.T. 6001, B.G. 2 – South Whitehall Township (39.20% LMI)
- C.T. 6303, B.G. 1 – Macungie Borough (41.25% LMI)
- C.T. 6303, B.G. 3 – Macungie Borough (41.15% LMI)
- C.T. 6500, B.G. 3 – Emmaus Borough (50.53% LMI)
- C.T. 6701, B.G. 3 – Salisbury Township (45.42% LMI)
- C.T. 6703, B.G. 3 – Salisbury Township (44.13% LMI)
- C.T. 6903, B.G. 2 – Upper Saucon Township (45.87% LMI)

AP-38 Project Summary

Project Summary Information

1.	Project Name	Aspire to Autonomy, Inc. (ASPIRE)
	Target Area	County-wide
	Goals Supported	CD-3 Public Services
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$22,000.00
	Description	Aspire to Autonomy (ASPIRE) will bring Specialized Trauma-Focused and Person-Centered Mental Health Therapy to individuals who are being trafficked, have been trafficked in the past, or are at high risk of becoming trafficked.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	150 individuals who are victims of trafficking will benefit from this activity.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 915 West Hamilton Street #171, Allentown, PA 18101.
	Planned Activities	The National Objective is Low/Mod Limited Clientele Benefit (LMC). The CDBG Matrix Code is 050 Mental Health Services.
2.	Project Name	Black Heritage Association of the Lehigh Valley
	Target Area	County-wide
	Goals Supported	AMP-3 Planning
	Needs Addressed	Administration, Management, and Planning Strategy
	Funding	CDBG: \$18,700.00
	Description	This is an HUD S3 Certification & Job Training, Employment, and Business Opportunities outreach program for LMI individuals and

		construction contractors that provide maintenance and general construction services and workers.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	15 low/mod individuals
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 1132 Hamilton Street #203, Allentown, PA 18101.
	Planned Activities	The CDBG Matrix Code is 21A Administration.
3.	Project Name	Communities in Schools of Eastern Pennsylvania – Career Supports at LCTI
	Target Area	County wide
	Goals Supported	ED-1 Employment
	Needs Addressed	Economic Development Strategy
	Funding	CDBG: \$25,000.00
	Description	CIS will provide intensive case management support to address the economic barriers that may impact a student's academic success in their career program @ LCTI. By addressing the non-academic barriers it is our goal to empower students to stay in school and achieve in their chosen career path.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 20 youth students will benefit from this activity.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 739 North 12th Street, Allentown, PA 18102
	Planned Activities	The National Objective is Low/Mod Limited Clientele Benefit (LMC). The CDBG Matrix Code is 05D Youth Services.

4.	Project Name	Lehigh Career and Technical Institute (LCTI) – Workforce Training Program
	Target Area	County wide
	Goals Supported	ED-1 Employment
	Needs Addressed	Economic Development Strategy
	Funding	CDBG: \$30,000.00
	Description	Economic Development in Lehigh Valley demands that more workers are equipped with certification in all major growing sectors, including manufacturing, logistics, construction, commercial driving license and heavy equipment. This project will allow us to provide qualified residents access to the training that can lead them to a path to a career and gainful employment with family thriving wages.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	15 to 20 low/mod individuals will benefit from this activity.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 4500 Education Park Drive, Schnecksville, PA 18078.
	Planned Activities	The National Objective is Low/Mod Limited Clientele Benefit (LMC). The Project Matrix Code is 05H Employment Training.
5.	Project Name	Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program
	Target Area	County-wide
	Goals Supported	SN-3 Social Services
	Needs Addressed	Special Needs Strategy
	Funding	CDBG: \$14,943.00
	Description	The PLACE (People Living in Accessible Community Environments) program will provide housing counseling services to 25 Lehigh County residents with disabilities, and their family members, who

		are living on limited income and may be at-risk of losing their housing.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	25 households with an individual with a disability will benefit from this activity.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 713 N. 13th Street, Allentown, PA 18102
	Planned Activities	The National Objective is Low/Mod Limited Clientele Benefit (LMC). The CDBG Matrix Code is 05B Handicapped Services.
6.	Project Name	Manito Life Center - Therapeutic Riding for At-Risk Adolescents and Adults
	Target Area	County-wide
	Goals Supported	CD-3 Public Services
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$30,000.00
	Description	Manito Life Center will provide therapeutic riding and equine assisted activities to Lehigh County children and adults who are experiencing anxiety and depression. Clients will realize a reduction in symptoms and increased quality of life.
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	35 low/mod adolescents and adults will benefit from this activity.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 2160 N. Cedar Crest Blvd. Allentown, PA 18104.
Planned Activities	The National Objective is Low/Mod Limited Clientele Benefit (LMC). The CDBG Matrix Code is 05O Mental Health Services.	

7.	Project Name	Meals on Wheels of the Lehigh Valley – Stable Food Support
	Target Area	County-wide
	Goals Supported	CD-4 Food Programs
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$15,000.00
	Description	This grant will support the home delivery of free, stable food to seniors and adults with disabilities within the project area.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	60 low/mod elderly individuals and/or individuals with disabilities will benefit from this activity.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 4234 Dorney Park Road, Allentown, PA 18104.
	Planned Activities	The National Objective is Low/Mod Limited Clientele Benefit (LMC). The CDBG Matrix Code is 05A Senior Services.
8.	Project Name	North Penn Legal Services – Fair Housing Outreach
	Target Area	County-wide
	Goals Supported	HS-5 Fair Housing
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$4,000.00
	Description	NPLS will support housing-related legal help to low-income people in Lehigh County with educational outreach, online resources, and printed self-help materials. NPLS will provide quarterly progress reports as indicated in the proposal.
	Target Date	9/30/2025
	Estimate the number and type of families that	An estimated 32 low/mod individuals will benefit from this activity.

	will benefit from the proposed activities	
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 559 Main Street, Suite 100, Bethlehem, PA 18018.
	Planned Activities	The National Objective is Low/Mod Limited Clientele Benefit (LMC). The CDBG Matrix Code is 21D Fair Housing Activities (subject to Admin cap).
9.	Project Name	North Penn Legal Services – Legal Help Project
	Target Area	County-wide
	Goals Supported	HS-6 Housing Supportive Services
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$12,000.00
	Description	NPLS will continue to provide housing-related legal help to low-income people in Lehigh County. NPLS will provide quarterly progress reports as indicated in the proposal.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 32 low/mod individuals will benefit from this activity.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 559 Main Street, Suite 100, Bethlehem, PA 18018
	Planned Activities	The National Objective is Low/Mod Limited Clientele Benefit (LMC). The CDBG Matrix Code is 05C Legal Services.
10.	Project Name	New Bethany, Inc. – Kitchen Update and Office Creation
	Target Area	County-wide
	Goals Supported	CD-2 Community Facilities
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$44,103.00

	Description	Funds will be used for updating the kitchen and creating an office with a bathroom.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	1 organization
	Location Description	1-3 South 2nd Street, Coplay, PA 18037-1224
	Planned Activities	The National Objective is Low/Mod Limited Clientele Benefit (LMC). The CDBG Matrix Code is 03C Homeless Facilities (not operating costs).
11.	Project Name	Community Action Lehigh Valley (CACLV) – Urgent Need Roof and HVAC Replacement Program
	Target Area	County-wide
	Goals Supported	HS-3 Housing Rehabilitation
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$45,014.00
	Description	CALV's Community Action Home (CAH) Urgent Need Roof & HVAC System Replacement Program aims to assist homeowners residing in Lehigh County (outside city limits) whose incomes are at or below 80% of the Area Median Income (AMI), especially those live in Catasauqua, Coplay, Hanover, Fountain Hill, Macungie, and Slatington. These homeowners are experiencing financial challenges living in houses whose qualities are deteriorating and urgently require repairs for roofs and/or non-functioning HVAC systems. This program will enhance housing safety and quality for three (3) eligible homeowners, contributing to better living conditions, health, and stability.
	Target Date	9/30/2025
	Estimate the number and type of families that	Approximately 3 low/mod households will benefit from this activity.

	will benefit from the proposed activities	
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 1337 East 5th Street, Bethlehem, PA 18015
	Planned Activities	The National Objective is Low/Mod Housing Benefit (LMH). The CDBG Matrix Code is 14A Rehab: Single-Unit Residential.
12.	Project Name	Redevelopment Authority of Lehigh County (RALC) – Blight to Bright
	Target Area	County-wide
	Goals Supported	CD-5 Clearance/Demolition
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$75,000.00
	Description	This project will involve the demolition of not less than two blighted properties that are vacant and uninhabitable. RALC will enter funding agreements with municipalities to undertake the demolition work. The municipality will place a lien against the property after the demolition is completed.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 2 structures will be removed.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 17 South 7th Street, Allentown, PA 18101.
	Planned Activities	The National Objective is Slum/Blight, Spot Basis (SBS). The CDBG Matrix Code is 04 Clearance and Demolition.
13.	Project Name	Coplay Borough – Street Resurfacing
	Target Area	County-wide
	Goals Supported	CD-1 Community Infrastructure
	Needs Addressed	Community Development Strategy

	Funding	CDBG: \$185,471.00
	Description	Rebuild two sections of the Borough roads serving residents of Section #9 - 11th Street between Magna Dr. and Chestnut St. Section #10-11th St. between Chestnut St. and Poplar St.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 3,472 individuals will benefit from this activity.
	Location Description	South 11 th Street between Magna Drive and Chestnut Street and North 11 th Street between Chestnut Street and Poplar Street, Coplay, PA 18037; C.T. 5800, B.G. 3.
	Planned Activities	The National Objective is Low/Mod Area Benefit (LMA). The CDBG Matrix Code is 03K Street Improvements.
	14. Project Name	Emmaus Borough – Curb Cuts
Target Area	County-wide	
Goals Supported	CD-1 Community Infrastructure	
Needs Addressed	Community Development Strategy	
Funding	CDBG: \$80,000.00	
Description	Removal of architectural barriers within the public right-of-way in highly traveled area by replacing existing curb and sidewalk to meet ADA handicap accessibility requirements.	
Target Date	9/30/2025	
Estimate the number and type of families that will benefit from the proposed activities	Approximately 11,652 individuals will benefit from this activity.	
Location Description	Intersections on Chestnut Street (at 11 th Street, Green Street, Moyer Street, and Perkiomen Street), Main Street (at S. Broom Street, Cherry Street, alley by N. 4 th Street), and State Avenue (at E. North Street, Jefferson Street, E. George Street, and E. Elm Street), and	

		Jubilee Street at S. 4 th Street, Emmaus, PA 18049; C.T. 6401, B.G. 1; C.T. 6500, B.G. 1, 2, 3 and 5; C.T. 6600, B.G. 2 and 5.
	Planned Activities	The National Objective is Low/Mod Area Benefit (LMA). The CDBG Matrix Code is 03L Sidewalks.
15.	Project Name	Macungie Borough – Sanitary Sewer Rehabilitation
	Target Area	County-wide
	Goals Supported	CD-1 Community Infrastructure
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$75,000.00
	Description	The Borough of Macungie is under a Connection Management Plan (CMP) through the PADEP due to high levels of inflow and infiltrations (I&I) of rain water into the sanitary sewer system. This I&I causes a reduction in available conveyance and treatment capacity, decreased system life, and increased operating cost. This project is to help eliminate I&I in this area, which is one of the remaining areas of the Borough where I&I has yet to be addressed. CDBG funds will be used for sewer rehabilitation and slip lining of 365 linear feet of sewer main and sixteen (16) laterals on Locust Street to address inflow and infiltration.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1,285 individuals will benefit from this activity.
	Location Description	Locust Street, Macungie, PA 18062; C.T. 6303, B.G. 3.
	Planned Activities	The National Objective is Low/Mod Limited Clientele benefit (LMC). The HUD Project Matrix Code is 03J Water/Sewer Improvements.
16.	Project Name	Salisbury Township – Sanitary Sewer Rehabilitation
	Target Area	County-wide
	Goals Supported	CD-1 Community Infrastructure

	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$59,190.00
	Description	Salisbury Township is under a Connection Management Plan (CMP) through the PADEP due to high levels of inflow and infiltration (I&I) of rain water into the sanitary sewer system. This I&I causes a reduction in available conveyance and treatment capacity, decreased system life, and increased operating cost. This project is to help eliminate I&I in this area, which is one of the most impacted areas of the Township. CDBG funds will be used to install a cured in-place liner along 600 linear feet of main sewer line on Marlow Street from Salisbury Road to Lehigh Avenue, and 245 linear feet on Stanley Avenue from Pearl Avenue towards Fretz Avenue.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1,255 individuals will benefit from this activity.
	Location Description	Marlow Street (between Salisbury Road and Lehigh Avenue) and the length of Stanley Avenue west of Pearl Avenue, Allentown, PA 18103; C.T. 6701, B.G. 3.
	Planned Activities	The National Objective is Low/Mod Limited Clientele Benefit (LMC). The CDBG Matrix Code is 03J Water/Sewer Improvements.
17.	Project Name	Slatington Borough – Willow Street Reconstruction and Curb Cuts
	Target Area	County-wide
	Goals Supported	CD-1 Community Infrastructure
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$89,605.00
	Description	The improvements are proposed for Willow Avenue from Dowell Street. This project proposes making improvements to the roadway, and four (4) ADA ramps along Willow Avenue between Dowell Street and North Street. These will improve travel and safety for the

		<p>residents of Slatington as well as any who use the street for automobile traffic, pedestrian traffic, or bicycle traffic. The improvements will allow all types of pedestrians to cross Willow Avenue in a more efficient and safer manner. This project will entail resurfacing the road, installing ADA ramps, and pavement restoration.</p> <p>CDBG funds will be used for street reconstruction on Willow Street from Dowell Street to North Street (51 linear feet) with four (4) curb cuts.</p>
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 750 individuals will benefit from this activity.
	Location Description	Willow Street between Dowell and North Streets, Slatington, PA 18080; C.T. 5100, B.G. 4.
	Planned Activities	The National Objective is Low/Mod Income Area Benefit (LMA). The CDBG Matrix Code is 03K Street Improvements.
18.	Project Name	Slatington Borough – Cherry Street Reconstruction and Curb Cuts
	Target Area	County-wide
	Goals Supported	CD-1 Community Infrastructure
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$96,465.00
	Description	The improvements are proposed for Cherry Street from Race Street to Yenser Alley. This project proposes making improvements to the roadway, and 2 ADA ramps along Cherry Street between Race Street and Yenser Alley. These will improve travel and safety for the residents of Slatington as well as any who use the street for automobile traffic, pedestrian traffic, or bicycle traffic. The improvements will allow all types of pedestrians to cross Cherry Street in a more efficient and safer manner. This project will entail resurfacing the road, installing ADA ramps, and pavement restoration.

		CDBG funds will be used for street reconstruction on Cherry Street from Race Street to Yenser Alley (466 linear feet) with two (2) curb cuts.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1,810 individuals will benefit from this activity.
	Location Description	Cherry Street between Race Street and Yenser Alley, Slatington, PA 18080; C.T. 5100, B.G. 2.
	Planned Activities	The National Objective is Low/Mod Income Area Benefit (LMA). The CDBG Matrix Code is 03K Street Improvements.
19.	Project Name	Slatington Borough – Hill Street Reconstruction
	Target Area	County-wide
	Goals Supported	CD-1 Community Infrastructure
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$94,165.00
	Description	The improvements are proposed for Hill Street from East Church Street to East Washington Street. This project proposes making improvements to the roadway. These will improve travel and safety for the residents of Slatington as well as any who use the street for automobile traffic, pedestrian traffic, or bicycle traffic. The improvements will allow all types of pedestrians to cross Hill Street in a more efficient and safer manner. This project will entail resurfacing the road, and pavement restoration. CDBG funds will be used for street reconstruction on Hill Street from East Church Street to East Washington Street (719 linear feet).
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1,810 individuals will benefit from this activity.

	Location Description	Hill Street between East Church and East Washington Streets, Slatington, PA 18080; C.T. 5100, B.G. 2.
	Planned Activities	The National Objective is Low/Mod Income Area Benefit (LMA). The CDBG Matrix Code is 03K Street Improvements.
20.	Project Name	Administration
	Target Area	County wide
	Goals Supported	AMP-1 General Administration
	Needs Addressed	Administration, Management, and Planning – AMP
	Funding	CDBG: \$225,539.00
	Description	CDBG funds will be used to provide administration, management, and planning services to efficiently and effectively operate Federal and state grant programs.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	1 Organization.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 17 South Seventh Street, Allentown, PA 18101
	Planned Activities	The CDBG Matrix Code is 21A General Program Administration.
21.	Project Name	HOME Administration
	Target Area	County wide
	Goals Supported	AMP-1 General Administration
	Needs Addressed	Administration, Management, and Planning – AMP
	Funding	HOME: \$45,758.00
	Description	HOME funds will be used to provide administration, management, and planning services to efficiently and effectively operate the HOME Investment Partnership (HOME) program.

	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	1 Organization.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem; 17 South Seventh Street, Allentown, PA 18101
	Planned Activities	The CDBG Matrix Code is 21A General Program Administration.
22.	Project Name	CHDO Set-Aside
	Target Area	County wide
	Goals Supported	HS-1 Housing Development HS-2 Homeownership HS-3 Housing Rehabilitation
	Needs Addressed	Housing Strategy
	Funding	HOME: \$68,638.00
	Description	HOME funds will be used to assist a CHDO to increase the number of affordable housing units in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1 Low/Mod household.
	Location Description	County-wide, excluding the cities of Allentown and Bethlehem.
	Planned Activities	The National Objective is Low/Mod Housing Benefit (LMH). The CDBG Matrix Code is 12 Construction of Housing.
23.	Project Name	Affordable Housing Project
	Target Area	County Wide

Goals Supported	HS-1 Housing Development HS-2 Homeownership HS-3 Housing Rehabilitation
Needs Addressed	Housing Strategy
Funding	HOME: \$343,186.73
Description	HOME funds will be used to assist in the development of affordable housing in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.
Target Date	9/30/2025
Estimate the number and type of families that will benefit from the proposed activities	Approximately 4 Low/Mod households.
Location Description	County-wide, excluding the cities of Allentown and Bethlehem.
Planned Activities	The National Objective is Low/Mod Housing Benefit (LMH). The CDBG Matrix Code is 12 Construction of Housing.

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AP-50 Geographic Distribution – 91.220(f)

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

Lehigh County undertakes projects using CDBG funds in Low- and Moderate-Income areas of the County. Many of the Boroughs in the County have high Low- and Moderate-Income populations, and projects are frequently targeted to these areas. Additionally, Lehigh County is an exception grantee where at least 38.29% of households with low- and moderate-incomes are CDBG eligible. There are no racially or ethnically concentrated areas of poverty within Lehigh County's CDBG jurisdiction, excluding the Cities of Allentown and Bethlehem.

The following information provides a profile of the population age, and racial/ethnic composition of Lehigh County. This information was obtained from the U.S. Census Bureau at <http://data.census.gov>. The 2018-2022 American Community Survey 5-Year Estimates were used to analyze the social, economic, housing, and general demographic characteristics of the City of Pittsburgh. The 5-year estimates are the most recent data available for the City. The 2010 and 2020 U.S. Census data is included where needed.

Lehigh County's overall population:

- Between 2010 and 2022, the population increased by approximately 6.6%, rising from 349,497 to 374,110.

Lehigh County's age of population:

- The median age in Lehigh County is 38.9 years old.
- Youth under age 18 account for 22.6% of the population.
- Adults between the ages of 35 and 60 account for 31.8% of the population.
- Adults that are 62 years and older account for 20.6% of the population.

Racial/ethnic composition of Lehigh County:

- 69.5% are White alone
- 7.0% are Black or African American alone
- 3.4% are Asian alone
- 0.3% are American Indian and Alaska Native alone
- 8.2% are Some Other Race alone
- 11.6% are Two or More Races
- 27.2% are Hispanic or Latino of any race

The median income for a family of four (4) in the Allentown-Bethlehem-Easton, PA HUD Metro FMR Area is \$98,300 for 2024. At the time of the 2018-2022 American Community Survey, median household income in Lehigh County was \$74,973 which was higher than the Commonwealth of Pennsylvania (\$73,170).

In Lehigh County, the overall percentage of low- and moderate-income (LMI) persons was 41.36% in 2015, while the First Quartile Low/Mod rate established by HUD for FY 2024 is 38.29%. A total of 11 census tract and block groups across the County had a majority (i.e., more than 51.0%) of persons with incomes at or below 80% of the Median Family Income (MFI). A total of 70 block groups in the County had a Low/Mod rate equal to or greater than the First Quartile Low/Mod rate of 38.29%.

According to the U.S. Labor Department’s Bureau of Labor Statistics, the non-seasonally adjusted preliminary unemployment rate for Lehigh County in April 2024 was 3.0%, which was slightly higher than the unadjusted preliminary rate of 2.9% for the Commonwealth of Pennsylvania. The seasonally adjusted national unemployment rate for April 2024 was 3.5%.

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

Geographic Distribution

Target Area	Percentage of Funds
County wide	100%

Table 54 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The proposed activities and projects for FY 2024-2028 are located in areas of the County with the highest percentages of low- and moderate-income persons, and those block groups with a higher than average percentage of minority persons. The following census tracts and block groups have at least 51% of the households with low- and moderate-incomes:

- C.T. 5100, B.G. 2 – Slatington Borough (54.14% LMI)
- C.T. 5100, B.G. 4 – Slatington Borough (72.67% LMI)
- C.T. 5602, B.G. 1 – Whitehall Township (51.12% LMI)
- C.T. 5703, B.G. 3 – Whitehall Township (58.55% LMI)
- C.T. 5704, B.G. 2 – Whitehall Township (56.69% LMI)
- C.T. 5901, B.G. 4 – Catasauqua Borough (61.10% LMI)
- C.T. 5901, B.G. 5 – Catasauqua Borough (62.07% LMI)
- C.T. 6500, B.G. 2 – Emmaus Borough (54.60% LMI)
- C.T. 6800, B.G. 1 – Fountain Hill Borough (70.16% LMI)
- C.T. 6800, B.G. 2 – Fountain Hill Borough (59.14% LMI)
- C.T. 6800, B.G. 4 – Fountain Hill Borough (52.04% LMI)

Additionally, because Lehigh County is an exception grantee and all Census Tracts where at least 38.29% of households with low- and moderate-incomes are CDBG eligible, the following Census Tracts and Block Groups are eligible:

- C.T. 5200, B.G. 1 – Washington Township (39.62% LMI)
- C.T. 5200, B.G. 2 – Washington Township (41.52% LMI)
- C.T. 5200, B.G. 3 – Washington Township (46.51% LMI)
- C.T. 5301, B.G. 2 – Heidelberg Township (46.23% LMI)
- C.T. 5302, B.G. 3 – Lynn Township (45.65% LMI)
- C.T. 5504, B.G. 3 – Washington Township (46.51% LMI)
- C.T. 5506, B.G. 2 – North Whitehall Township (38.29% LMI)
- C.T. 5602, B.G. 3 – Whitehall Township (49.67% LMI)
- C.T. 5602, B.G. 4 – Whitehall Township (39.52% LMI)
- C.T. 5702, B.G. 2 – Whitehall Township (40.44% LMI)
- C.T. 5702, B.G. 3 – Whitehall Township (44.48% LMI)
- C.T. 5703, B.G. 2 – Whitehall Township (42.94% LMI)
- C.T. 5704, B.G. 1 – Whitehall Township (46.21% LMI)
- C.T. 5800, B.G. 1 – Coplay Borough (44.76% LMI)
- C.T. 5800, B.G. 2 – Coplay Borough (41.60% LMI)
- C.T. 5800, B.G. 3 – Coplay Borough (45.30% LMI)
- C.T. 5901, B.G. 1 – Catasauqua Borough (41.36% LMI)
- C.T. 5902, B.G. 1 – Hanover Township (47.52% LMI)
- C.T. 6001, B.G. 2 – South Whitehall Township (39.20% LMI)
- C.T. 6303, B.G. 1 – Macungie Borough (41.25% LMI)
- C.T. 6303, B.G. 3 – Macungie Borough (41.15% LMI)
- C.T. 6500, B.G. 3 – Emmaus Borough (50.53% LMI)
- C.T. 6701, B.G. 3 – Salisbury Township (45.42% LMI)
- C.T. 6703, B.G. 3 – Salisbury Township (44.13% LMI)
- C.T. 6903, B.G. 2 – Upper Saucon Township (45.87% LMI)

Discussion

The geographic locations and the public benefit for the FY 2024 CDBG Activities/Projects are as follows:

- **Aspire to Autonomy – Mental Health Therapy** – County-wide, excluding the cities of Allentown and Bethlehem; 915 West Hamilton Street #171, Allentown, PA 18101; Low/Mod Limited Clientele Benefit (LMC).
- **Black Heritage Association of the Lehigh Valley – S3 Certification Outreach and Registry** – County-wide, excluding the cities of Allentown and Bethlehem; 1132 Hamilton Street #203, Allentown, PA 18101; Low/Mod Job Creation and Retention (LMJ).

- **Communities in Schools of Eastern Pennsylvania – Career Supports at LCTI** – County-wide, excluding the cities of Allentown and Bethlehem; 739 North 12th Street, Allentown, PA 18102; Low/Mod Limited Clientele Benefit (LMC).
- **Community Action Lehigh Valley – Urgent Need Roof and HVAC Replacement Program** – County-wide, excluding the cities of Allentown and Bethlehem; 915 West Hamilton Street #171, Allentown, PA 18101.
- **Coplay Borough – Street Reconstruction** – 11th Street between Magna Drive and Poplar Street; C.T. 5800, B.G. 3; Low/Mod Area Benefit (LMA).
- **Emmaus Borough – Curb Cuts** – Intersections along Chestnut Street, Main Street, State Avenue, and Jubilee Street, Emmaus Borough, PA; C.T. 6401, B.G. 1; C.T. 6500, B.G. 1, 2, 3 and 5; C.T. 6600, B.G. 2 and 5; Low/Mod Area Benefit (LMA).
- **Lehigh Career & Technical Institute – Workforce Training Program** – County-wide, excluding the cities of Allentown and Bethlehem; 4500 Education Park Drive, Schnecksville, PA 18078; Low/Mod Limited Clientele Benefit (LMC).
- **Redevelopment Authority of Lehigh County (RALC) – Blight to Bright** – County-wide, excluding the cities of Allentown and Bethlehem; Slum/Blight, Spot Basis (SBS).
- **Lehigh Valley Center for Independent Living – People Living in Accessible Community Environments (PLACE)** – County-wide, excluding the cities of Allentown and Bethlehem; 713 N. 13th Street, Allentown, PA 18102; Low/Mod Limited Clientele Benefit (LMC).
- **Macungie Borough – Sanitary Sewer Rehab** – Locust Street, Macungie, PA 18062; C.T. 6303, B.G. 3; Low/Mod Limited Clientele Benefit (LMC).
- **Manito Life Center – Therapeutic Riding for At-Risk Adolescents and Adults** – County-wide, excluding the cities of Allentown and Bethlehem; 2160 N. Cedar Crest Blvd. Allentown, PA 18104; Low/Mod Limited Clientele Benefit (LMC).
- **Meals on Wheels – Stable Food Support** – County-wide, excluding the cities of Allentown and Bethlehem; 4234 Dorney Park Road, Allentown, PA 18104; Low/Mod Limited Clientele Benefit (LMC).
- **New Bethany, Inc. – Kitchen Update and Office Creation** – County-wide; Low/Mod Limited Clientele Benefit (LMC).
- **North Penn Legal Services – Fair Housing Outreach** – County-wide, excluding the cities of Allentown and Bethlehem; Low/Mod Limited Clientele Benefit (LMC).
- **North Penn Legal Services – Legal Aid Project** – County-wide, excluding the cities of Allentown and Bethlehem; Low/Mod Limited Clientele Benefit (LMC).
- **Salisbury Township – Sanitary Sewer Rehabilitation** – Marlow Street and Stanley Avenue, Allentown, PA 18103; C.T. 6701, B.G. 3; Low/Mod Limited Clientele Benefit (LMC).
- **Slatington Borough – Willow Street Reconstruction and Curb Cuts** – Willow Street, Slatington, PA 18080; C.T. 5100, B.G. 2; Low/Mod Area Benefit (LMA).
- **Slatington Borough – Cherry Street Reconstruction and Curb Cuts** – Cherry Street, Slatington, PA 18080; C.T. 5100, B.G. 2; Low/Mod Area Benefit (LMA).
- **Slatington Borough – Hill Street Reconstruction** – Hill Street, Slatington, PA 18080; C.T. 5100, B.G. 2; Low/Mod Area Benefit (LMA).

- **Administration** – County-wide, excluding the cities of Allentown and Bethlehem; 17 South Seventh Street, Allentown, PA 18101.

The geographic locations and the public benefit for the FY 2024 HOME Activities/Projects are as follows:

- **HOME Administration** – County-wide, excluding the cities of Allentown and Bethlehem; 17 South Seventh Street, Allentown, PA 18101.
- **CHDO Set-Aside** – County-wide, excluding the cities of Allentown and Bethlehem.
- **Affordable Housing Project** – County-wide, excluding the cities of Allentown and Bethlehem.

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Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Lehigh County will utilize its CDBG and HOME funds to rehabilitate and to support the construction of new affordable housing units. The one year goals for affordable housing in the County for FY 2024 are as follows:

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	8
Special-Needs	0
Total:	8

Table 55 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	5
Rehab of Existing Units	3
Acquisition of Existing Units	0
Total:	8

Table 56 - One Year Goals for Affordable Housing by Support Type

Discussion

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

- **Community Action Lehigh Valley (CACLV) – Urgent Need Roof and HVAC Replacement Program** - CDBG funds will be used to provide an urgently needed roof and HVAC replacement program to properties with low- to moderate-income owners. (3 Housing Unit)
- **CHDO Set-Aside** - HOME funds will be used to assist a CHDO to increase the number of affordable housing units in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation. (1 Housing Unit)
- **Affordable Housing Project** - HOME funds will be used to assist in the development of affordable housing in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation. (4 Housing Units)

AP-60 Public Housing – 91.220(h)

Introduction

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

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

Each year, the Lehigh County Housing Authority (LCHA) receives an allocation of funds from HUD under the Capital Fund Program to undertake physical improvements. In addition, the LCHA receives operating subsidies to offset the operating deficits associated with public housing units and to carry out maintenance.

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

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

Family Self-Sufficiency (FSS) programs are provided to Section 8 Housing Choice Voucher Holders and public housing tenants. FSS program residents work with a case manager to develop goals that will, over a five (5) year period, lead to self-sufficiency. These goals may include education, specialized training, job readiness, job placement activities, and career advancement objectives. The goals for each participating family member are set out in Individual's Training and Service Plan.

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

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

Discussion

Not Applicable.

DRAFT

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

Lehigh and Northampton Counties are served by the Lehigh Valley Regional Homeless Advisory Board (LVRHAB), which is a subdivision of the Eastern PA CoC. According to the Governance Charter for the Eastern PA Continuum of Care Collaborative, the mission of the Eastern PA CoC is to end homelessness throughout the 33 county Continuum of Care. The CoC works toward ending homelessness by providing a framework for a comprehensive and well-coordinated regional and local planning process. This includes identifying needs, conducting a system-wide evaluation of existing resources and program activities, and building a system of housing and services that addresses those needs. This mission is pursued through the development of long-range plans to prevent and end homelessness in the geographic area, as well as the coordination necessary for successful implementation. The objectives of the CoC include the following:

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

The LVRHAB Funding Committee is responsible for project selection and ranking for submission through the CoC's annual HUD application. In this capacity, the Committee reviews all documents from the previous funding round; sets a schedule and time line for the current funding round; develops and edits forms for new project and renewal evaluations; develops ranking criteria; collaborates with the Data Management, Collection, and Outcomes Committee, as necessary; and provides ranking reports to the CoC. In order to increase CoC-wide performance, ensure the strategic use of HUD funds, and develop new resources, the Funding Committee is also in charge of developing the CoC's reallocation strategy, which includes setting policy addressing funding cuts or allocation of additional resources in response to HUD's Continuum of Care NOFA.

The CoC provides funds for projects that assist homeless populations in the area through CoC funding and creates partnerships with other entities to utilize additional sources of funding. The City of Allentown receives ESG funds and is included with the local homeless coalition, along with representatives of various stakeholders and service providers. The CoC also funds Shelter Plus Care projects and Supportive Housing Programs (SHP) through the Lehigh County Housing Authority and its development entity, the Valley Housing Development Corporation.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their

individual needs

The Continuum of Care completes an annual “Point in Time Count Survey” in January to determine the number of homeless individuals and families in the Eastern Pennsylvania Region. Based on the Point in Time Count (PITC) conducted during January 2024, the following numbers of homeless persons were reported in Lehigh County:

- **Unsheltered** - 144 individuals, 0 families with children, and 0 children only
- **Transitional Housing** - 30 individuals, 7 families with children, and 0 children only
- **Emergency Shelter** - 187 individuals, 38 families with children, and 8 children only

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

Catholic Charities will also provide food for at-risk persons and families in conjunction with the Lehigh County Conference of Churches. Lehigh County, through its various human services programs, provides support to all the categories of non-homeless special needs populations. The County also funds the Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program, which assists at-risk persons with housing location assistance and provides fair housing workshops for landlords.

Addressing the emergency shelter and transitional housing needs of homeless persons

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

Outreach to homeless persons will be conducted by service providers. Organizations like the Lehigh County Conference of Churches will contact the homeless individuals that use the emergency shelters during weather advisory. Lehigh County Conference of Churches will also make outreach to the chronically

homeless that live in communities and attempt to assess them. This outreach, combined with case management.

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

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

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

As of the 2024 Eastern PA CoC Housing Inventory Count, the shelter and transitional housing that is available in Lehigh County included the following:

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

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

The CoC has implemented various strategies to ensure that those transitioning out of homelessness are able to procure permanent housing, which resulted in a 4% increase in the transition from Emergency Shelter, Transitional Housing, and Rapid Rehousing into permanent housing during 2024. Diversion strategies have been used to place those that go through intake with the CoC into Rapid Rehousing. Many of the CoC funded transitional housing beds have been converted into Rapid Rehousing beds across the 33-county area. Rapid Rehousing providers have been trained in best practices including housing first strategy, focused case management, harm reduction, motivational interviewing, and trauma-informed care. Currently, there are 189 Rapid Rehousing beds in Lehigh County; 36 of these 189 Rapid Rehousing beds are dedicated to youth.

Rapid Rehousing programs are connected to landlords and households with affordable units to sustain permanent housing. The CoC makes sure to focus on in-home case management for the tenant, as well as engagement with the landlord. Additionally, the CoC partners with mainstream service providers, such as workforce development, childcare, transportation, and other resources to promote long-term stability for persons and their families that have transitioned out of homelessness. There are also 168 Permanent Supportive Housing beds dedicated to chronically homeless individuals.

Valley Youth House is a major provider of services for the homeless youth in the area. Valley Youth House will assist individuals that may have been in foster care. Valley Youth House receives funding for both Transitional Housing and Rapid Rehousing activities. Youth homelessness is a problem in the Lehigh Valley area. It is estimated that nearly 10% of the homeless people in the area fall into the 18-24 age group. There is a need for a year-round shelter for this age group, as Valley Youth House does not serve youth over the age of 18. Focused outreach has been conducted by the CoC on this age group in partnership with Valley Youth House, and this population continues to be a priority for Lehigh County.

Turning Point of the Lehigh Valley will provide housing to victims of domestic violence and their families. They provide 26 emergency shelter beds for survivors fleeing immediate abuse and will partner with other agencies to find permanent housing for victims, including Third Street Alliance, which is the major Rapid Rehousing provider for this population.

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

Discussion

The CoC allocated FY 2023 funding to the following projects under its multi-year program:

The CoC was awarded \$3,870,386 as part of the Tier 1 awards:

- Lehigh County Conference of Churches – Outreach and Case Management for the Disabled, Chronically Homeless - \$71,545
- Lehigh County Conference of Churches – Pathways Permanent Supportive Housing Consolidation - \$1,097,370
- Lehigh County Conference of Churches – Pathways Rapid Rehousing - \$390,252
- Lehigh County Housing Authority – LCHA S+C 2022 - \$241,210
- Valley Housing Development Corporation – VHDC SHP #2/3 2022 - \$403,265
- New Bethany, Inc. DBA New Bethany Ministries – New Bethany Rapid Rehousing - \$135,597
- Northampton County Housing Authority – NCHA S+C 2022 - \$100,779
- The Salvation Army, a New York Corporation – Allentown Hospitality House Permanent Housing Program - \$184,502
- Third Street Alliance for Women and Children – Lehigh Valley Rapid Re-Housing Program - \$387,700
- Valley Youth House Committee, Inc. – Lehigh Valley RRH for Families - \$322,472
- Valley Youth House Committee, Inc. – TH-RRH for Lehigh Valley Youth - \$535,694

The CoC was awarded \$406,873 as part of the Tier 2 awards:

- Resources for Human Development, Inc. – LV ACT Housing Supports - \$229,840
- Resources for Human Development, Inc. – LV ACT Housing Supports – Expansion - \$70,000
- Valley Youth House Committee, Inc. – TH-RRH for Lehigh Valley Youth – Expansion - \$107,033

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

Introduction

Lehigh County's 2018 Analysis of Impediments to Fair Housing Choice has identified the following impediments in the County:

- **Impediment 1: Lack of Affordable Housing** - There is a lack of affordable housing in Lehigh County due to the influx in the number of unskilled and semi-skilled workers who have moved into the County, which has created a high demand and a corresponding increase in the cost of rental and sales housing.
- **Impediment 2: Lack of Accessible Housing** - There is a lack of accessible housing in Lehigh County since the supply of accessible housing has not kept pace with the demand caused by the increase in the percentage of elderly persons in Lehigh County and more disabled persons desiring to live independently.
- **Impediment 3: Barriers Limiting Housing Choice** - There are physical, economic, and social barriers in Lehigh County which limit housing choices and housing opportunities for low-income households, minorities, and the disabled members of the County's population.
- **Impediment 4: Lack of Housing Awareness** - There is a lack of knowledge and understanding concerning the rights of individuals, families, and members of the protected classes in regard to the Fair Housing Act (FHA) and awareness of discriminatory practices.
- **Impediment 5: Lack of Economic Opportunities** - There is a lack of economic opportunities in the County for lower-income households to increase their income and thus improve their choices of housing.

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

North Penn Legal Services (NPLS) is a subrecipient of FY 2024 CDBG funds from Lehigh County. NPLS is funded as a public service activity and provides legal aid related to affordable housing, serving low- and moderate-income residents living in Lehigh County outside of Allentown and Bethlehem. NPLS staff provides assistance to residents who face eviction, are denied housing, or are forced to live in uninhabitable conditions. This activity is conducted through workshops held at local social service agencies and in mobile home parks. Information on foreclosures, consumer issues, and fair housing is also provided to the residents of Lehigh County.

In addition, NPLS monitors housing practices and counsels victims of discrimination. NPLS policies and activities promote the awareness of fair housing requirements. They provide consultation to developers and municipalities to ensure that rental and for-sale units are marketed in accordance with the affirmative marketing rules of the U.S. Department of Housing and Urban Development. NPLS ensures that all housing programs and services provided by Lehigh County, its municipalities, and NPLS itself, are administered in a way that promotes fair housing on the basis of race, national origin, religion, gender, disability, and familial status. NPLS' fundamental mission is to increase access to affordable housing for all persons.

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

Discussion

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

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

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

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

DRAFT

AP-85 Other Actions – 91.220(k)

Introduction

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

Actions planned to address obstacles to meeting underserved needs

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

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

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

Actions planned to foster and maintain affordable housing

Under its FY 2024-2028 Five Year Consolidated Plan, Lehigh County proposes to foster and maintain affordable housing through the following Five Year goals and Strategies:

HOUSING STRATEGY - HS

Need:

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

Goal:

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

Objectives:

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

Lehigh County will address the following goal in the FY 2024 Annual Action Plan:

- **North Penn Legal Services – Fair Housing Outreach** - NPLS will support Fair Housing Outreach with housing-related legal help to low-income people in Lehigh County with educational outreach, online resources, and printed self-help materials.
- **North Penn Legal Services – Legal Help Project** - NPLS will continue to provide housing-related legal help to low-income people in Lehigh County.
- **Community Action Lehigh Valley (CACLV) – Urgent Need Roof and HVAC Replacement Program** – CDBG funds will be used to assist homeowners residing in Lehigh County (outside city limits) whose incomes are at or below 80% of the Area Median Income (AMI), especially those live in Catasauqua, Coplay, Hanover, Fountain Hill, Macungie, and Slatington. These homeowners are experiencing financial challenges living in houses whose qualities are deteriorating and urgently require repairs for roofs and/or non-functioning HVAC systems.

- **CHDO Set-Aside** – HOME funds will be used to assist a CHDO to increase the number of affordable housing units in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.
- **Affordable Housing Project** – HOME funds will be used to assist in the development of affordable housing in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.

Actions planned to reduce lead-based paint hazards

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

Rehabilitation Programs

Lehigh County will continue to ensure that:

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

Homeownership Programs

Lehigh County will ensure that:

- Applicants for homeownership assistance receive adequate information about lead-based paint requirements.
- County staff properly determine whether proposed projects are exempt from some or all lead based paint requirements.

- A visual assessment is performed to identify deteriorated paint in the dwelling unit, any common areas servicing the unit, and exterior surfaces of the building.
- Prior to occupancy, properly qualified personnel perform paint stabilization and the dwelling passes a clearance exam in accordance with the standards established in 24 CFR Part 35, Subpart R.
- The home buyer receives the required lead-based paint pamphlet and notices.

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

Actions planned to reduce the number of poverty-level families

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

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

In Lehigh County, the Community Action Committee of the Lehigh Valley (CACLV) is the official anti-poverty agency. CACLV provides rent and utility assistance, case management, and counseling services to assist with financial management, benefit entitlement assistance, home weatherization to reduce utility costs, furniture and household goods, alcohol and mental health counseling, foreclosure mitigation counseling, child care, college readiness, pardon and expungement assistance, and other various programs that empower low-income households by assisting them to develop the skills needed for independent living.

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

Lehigh County funded five (5) projects with FY 2024 CDBG funds to assist residents and families living in poverty:

- Communities in Schools of the Lehigh Valley – Career Supports at LCTI
- Lehigh Career and Technical Institute – Tuition for Low-Income Residents
- Lehigh Valley Center for Independent Living – People Living in Accessible Community Environments (PLACE) Program

- North Penn Legal Services – LMI Legal Help
- Community Action Committee of Lehigh Valley – Urgent Need Roof and HVAC Replacement Program

Additionally, Lehigh County funded two projects with FY 2024 HOME funds to assist residents and families living in poverty:

- CHDO Set-Aside
- Affordable Housing Project

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

- Lehigh County works in conjunction with Lehigh Valley Economic Development Corporation (LVEDC), community organizations, other economic development groups and the Workforce Investment Board to help enhance programs and create opportunities in the County.
- Lehigh County Economic Development Corporation (LVEDC) is able to provide manufacturing, industrial, and nonprofit organizations with low-interest financing generated through tax exempt revenue bonds.

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

Actions planned to develop institutional structure

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

In order to address the County's housing and community development needs, the County has established an extensive public-private partnership aimed at revitalization in the County. In 2024, the partnership includes the following agencies:

- North Penn Legal Services
- Catholic Charities, Diocese of Allentown
- Lehigh Career & Technical Institute
- Meals on Wheels of the Greater Lehigh Valley
- Lehigh Valley Center for Independent Living (LVCIL)

- Lehigh Career and Technical Institute
- Lehigh Valley Regional Homeless Advisory Board
- Communities in Schools of Eastern Pennsylvania

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

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

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

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

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

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

Discussion

Not Applicable.

Program Specific Requirements

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

Introduction

Lehigh County receives an annual allocation of CDBG and HOME funds. The County does not expect to generate program income from any CDBG funded activities in FY 2024. Since the County receives a CDBG Federal allocation, the questions below have been completed, as applicable.

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

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

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

Other CDBG Requirements

1. The amount of urgent need activities	\$0.00
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low- and moderate-income. Specify the years covered that include this Annual Action Plan.	86.8%

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

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

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

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

See attached Resale/Recapture Policy in the Appendix Section of the FY 2024-2028 Five Year Consolidated Plan.

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

Not Applicable.

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

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

- 5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).**

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

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

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

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

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

Not Applicable.

Discussion

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

Lehigh County does not limit the beneficiaries or give preferences to a particular segment of the low-income population. The County assists on a first come, first serve basis for its HOME activities. The County will take HOME Funding Request Applications for the FY 2024 HOME funds and the Local HOME Match funds.

CDBG Program Income:

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

CDBG Percentages:

- Administrative Percentage: 20%
- Public Service Percentage: 12%
- Low- and Moderate-Income Percentage: 86.8%
- Slum and Blight Percentage: 13.2%

HOME Program Income:

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

HOME Percentages:

- Administrative Percentage: 10.0%
- CHDO Set-A-Side: 15%