

Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The City of Bethlehem (City) is an entitlement jurisdiction that receives federal funds from the U.S. Department of Housing and Urban Development (HUD). The City receives HUD funding under the Community Development Block Grant (CDBG) Program along with the HOME Investment Partnerships (HOME) Program.

The CDBG entitlement program provides formula funding to cities and counties to address community development needs. Seventy percent of gross funding must be used to serve low- to moderate-income households. Eligible activities must meet one of the following national objectives for the program:

The CDBG entitlement program provides formula funding to cities and counties to address community development needs. Seventy percent of gross funding must be used to serve low- to moderate-income households. Eligible activities must meet one of the following national objectives for the program:

- Benefit low- and moderate-income persons.
- Prevent or eliminate slums or blight.
- Address community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community for which other funding is not available.

The HOME entitlement program provides formula grant funding for a wide range of activities including building, purchasing, and/or rehabilitating affordable housing for rent or homeownership and providing direct rental assistance to low-income households. The program's flexibility allows states and local governments to use HOME funds for grants, direct loans, loan guarantees or other forms of credit enhancements, or rental assistance or security deposits.

The Consolidated Plan (ConPlan) is a five-year planning document. This ConPlan covers the planning period from Program Year (PY) 2025-2029. The purpose of the ConPlan is to guide a jurisdiction to:

- Assess their affordable housing and community development needs and market conditions;
- Make data-driven, place-based investment decisions; and
- Conduct community-wide discussions to identify housing and community development priorities that align and focus on eligible activities for CDBG funding.

In addition, recipients of CDBG and HOME funds must also prepare and submit to HUD an Annual Action Plan (AAP) yearly that describes, in detail, how the ConPlan will be carried out. The AAP must provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used to address the priority needs and specific goals identified by the ConPlan. At the close of each Fiscal Year, jurisdictions must additionally complete and submit to HUD a Consolidated Annual Performance and Evaluation Report (CAPER) to report on the accomplishments and progress toward the

ConPlan's goals. The City of Bethlehem anticipates approximately \$1,418,306 in CDBG funds and \$417,183.96 in HOME funds for the 2025-2029 ConPlan period.

The City of Bethlehem agrees that its compliance in all respects with all applicable Federal anti-discrimination laws is material to the U.S. Government's payment decisions for purposes of section 3729(b)(4) of title 31, United States Code.

The City of Bethlehem will not operate any programs that violate any applicable Federal anti-discrimination laws, including Title VI of the Civil Rights Act of 1964.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The objective of the Needs Assessment is to gather information from the community and all partners, as well as to analyze demographic, housing, and economic data in relation to the City's homeless population, special needs populations, and general low- to moderate-income populations. This analysis yields a better understanding of affordable housing and community development needs in the community. This information is used to make data-driven decisions about priority community needs and strategies, based on current conditions, anticipated funds, and local capacity. Through data collection, community outreach, and analysis presented in this ConPlan, a clear outline of the City's priority needs is formed, along with projects and facilities that are most likely to aid in the City's development. A summary of needs identified in the City of Bethlehem are included in table below.

For additional discussion of these identified needs, see the Needs Assessment (NA) and Market Analysis (MA) sections of this ConPlan.

Sort Order	Goal Name	Category	Needs Addressed	Funding	Goal Outcome Indicator
1	Create and Preserve Affordable Rental Housing	Affordable Housing	Improve the quality of existing housing (HS)	\$400,000.00	KOMI: Rental units constructed: 200 units Rental units rehabilitated: 40 units
2	Preserve Owner-Derived Coupled Housing	Affordable Housing	Improve the quality of existing housing Foster strong, vibrant neighborhoods Housing (HS)	\$22,706.00 \$300,000.00	CD96: Homeowner housing rehabilitated: 80 units KOMI:
3	Enhance Homeownership Opportunities	Affordable Housing	Increase the rate of homeownership Housing (HS)	\$477,327.82	KOMI: Direct financial assistance to homeowners: 20 households assisted
4	Address Impediments to Fair Housing Choice	Affordable Housing Public Housing Business	Improve the quality of existing housing Increase the rate of homeownership Foster strong, vibrant neighborhoods Housing (HS)	\$125,000.00	CD96: Public service activities other than low/moderate income housing benefit: 450 households assisted
5	Support Homeless Housing and Services	Business	Foster strong, vibrant neighborhoods Enhance the availability of community services	\$429,132.85 \$400,000	CD96: Public service activities for low/moderate income housing benefit: 2,000 persons assisted KOMI: Homeless prevention: 80 households assisted Homeless person overnight shelter: 2,000 persons assisted
6	Support High Quality Public Services	Non-Housing Community Development	Enhance the availability of community services	\$545,833.51	CD96: Public service activities for low/moderate income housing benefit: 20,000 households assisted
7	Improve Public Facilities and Infrastructure	Non-Housing Community Development	Provide quality infrastructure and community facilities Enhance public safety	\$1,769,494.52	CD96: Public facility or infrastructure activities other than low/moderate income housing benefit: 200,000 persons assisted
8	Create and Preserve Local Jobs	Non-Housing Community Development	Support the growth of the local economy Local Economy (HS)	\$1,000,000	CD96: Businesses assisted: 155 businesses assisted CD96: Other: \$1,418,800 KOMI: \$200,000.00
9	Planning and Administration	Planning and Administration	Planning and Administration		
10	Safety and Mobility for All Modes of Transportation (HS)	Non-Housing Community Development	Provide quality infrastructure and community facilities Transportation and Streetcape (HS)	\$10,000	CD96: Public facility or infrastructure activities other than low/moderate income housing benefit: 20,000 persons assisted
11	Enhance and Beautify the Public Realm (HS)	Non-Housing Community Development	Provide quality infrastructure and community facilities Foster strong, vibrant neighborhoods Transportation and Streetcape (HS)	\$50,000	CD96: Public facility or infrastructure activities other than low/moderate income housing benefit: 20,000 persons assisted
12	Support Existing Businesses and Attract New Ones	Non-Housing Community Development	Support the growth of the local economy Local Economy (HS)	\$50,000	CD96: Businesses assisted: 155 businesses assisted
13	Physical Improvements to Broad Street Corridor (HS)	Non-Housing Community Development	Provide quality infrastructure and community facilities Transportation and Streetcape (HS)	\$50,000	CD96: Public facility or infrastructure activities other than low/moderate income housing benefit: 2,000 persons assisted
14	Physical Improvements to Linden St. Corridor (HS)	Non-Housing Community Development	Provide quality infrastructure and community facilities Transportation and Streetcape (HS)	\$50,000	CD96: Public facility or infrastructure activities other than low/moderate income housing benefit: 2,000 persons assisted
15	Support Homeowners and Renters (HS)	Affordable Housing	Improve the quality of existing housing Housing (HS)	\$50,000	CD96: Public service activities for low/moderate income housing benefit: 200 persons assisted
16	Enhance Quality of Life for All Residents (HS)	Non-Housing Community Development	Enhance public safety Support the growth of the local economy Foster strong, vibrant neighborhoods Enhance the availability of community services Housing (HS) Local Economy (HS) Transportation and Streetcape (HS)	\$50,000	CD96: Public service activities other than low/moderate income housing benefit: 20,000 persons assisted
17	Expand the Availability of Services (HS)	Non-Housing Community Development	Foster strong, vibrant neighborhoods Enhance the availability of community services Housing (HS) Local Economy (HS) Transportation and Streetcape (HS)	\$50,000	CD96: Public service activities other than low/moderate income housing benefit: 20,000 households assisted
18	Build Community Cohesion (HS)	Non-Housing Community Development	Housing (HS) Local Economy (HS)	\$50,000	CD96: Public service activities for low/moderate income housing benefit: 20,000 households assisted

Summary of Needs Table

3. Evaluation of past performance

Over the course of the last five years, the City's CDBG and HOME funds contributed successfully to several projects. Those projects have improved housing affordability and expanded economic opportunities for low- to moderate-income households. 2020-2024 ConPlan goals included: (1) Create and Preserve Affordable Housing; (2) Preserve Owner-Occupied Housing; (3) Address Impediments to Fair Housing Choice; (4) Support High Quality Public Services; (5) Enhance Homeownership Opportunities; (6) Support Homeless Housing and Services; (7) Improve Public Facilities and Infrastructure; and (8) Create and Preserve Local Jobs.

In terms of housing initiatives, the City completed a variety of activities. The City prioritized improving existing housing stock throughout the City and the Northside 2027 Neighborhood through housing rehabilitation, production of new units, tenant-based rental assistance, and first-time homebuyer assistance.

The City additionally focused on providing high quality services to LMI, special needs, and homeless residents through the allocation of funds for public service agencies and public assistance. As reported in the City's yearly Consolidated Annual Performance and Evaluation Reports (CAPERs), a sample of funded programs included:

- Project SUCCESS, Center for Humanistic Change. This program provided a mentoring program to middle school and high school students to prevent and reduce substance abuse.
- TechGYRLS, YWCA. This program provided science, technology, engineering, and math enrichment to Bethlehem girl students between the ages of 9 to 13.
- Hogar CREA International of Pennsylvania, Inc. This program provided housing and counseling services to people suffering with addiction within the Bethlehem community.
- Faith in Action, ShareCare. This program assisted elderly persons and seniors who are disabled by providing caregiving assistance, transportation, and visitation to prevent isolation.
- PLACE, Lehigh Valley Center for Independent Living. This program assisted residents with disabilities who may be at risk of homelessness by providing connections to housing options and services to achieve independence.
- Lehigh Valley Fair Housing Project, North Penn Legal Services. This program provided fair housing training, outreach events, fair housing materials, and fair housing case management.
- Representative Payee Program, New Bethany. The program combatted homelessness by providing financial management services to current or previously homeless individuals.
- Bethlehem Emergency Sheltering, Inc. (BES). This program provided shelter, bagged breakfast, and hot dinner service.
- Meal/Food Services (Pantry Food Service, Choice Pantry, Mobile Food Pantry, and Trinity Soup Kitchen).

4. Summary of citizen participation process and consultation process

Community input for this ConPlan took place through a variety of methods. A Community Needs Survey was published online and available to community members in both English and Spanish from October 2024 to December 2024. The Community Needs Survey was advertised to community partners and non-

profit organizations, promoted online and through fliers, and shared during community meetings. The Survey received a total of 199 responses and helped to inform this ConPlan.

Interviews and roundtables with local and regional stakeholders throughout the community were also conducted in October of 2024 to gain input from the perspective of stakeholders. A Stakeholder Summary can be found in the Appendix for this ConPlan.

The City additionally held two virtual public meetings to gather input from community members.

Community meetings were advertised through a variety of methods, including posting to the City's website, sharing fliers, and sharing information with community partners. The first meeting was held on November 6, 2024, and the second meeting was held on December 2, 2024.

[On July 15, 2025, during which this ConPlan was reviewed and adopted by the City Council.]

5. Summary of public comments

Community meetings yielded numerous comments that identified priorities for residents of the City. The top priorities identified during the meetings were:

- Infrastructure and Public Facilities:
 - Broadband services
 - Sidewalk accessibility
 - Public park maintenance
 - Safety
 - Afterschool facilities
 - ADA improvements
 - Climate resiliency
- Economic Development
 - Small business development
 - Workforce training
 - Microenterprise assistance
- Public Services
 - Senior services
 - Youth services
 - Services for persons with disabilities
 - Homeless services
 - Childcare for LMI families
 - Mental health services
- Housing
 - Affordable rental housing
 - Homeownership education
 - Homeowner housing rehabilitation
 - Weatherization program

Stakeholders provided feedback on the priority needs of the City through interviews and roundtables in October of 2024. Critical areas of priority identified were:

- Homeless supportive services, shelters, street medical services, and transitional housing

- Affordable housing
- Water and wastewater systems
- Roads and infrastructure rehabilitation, including park improvements and trail maintenance
- Workforce training
- Supportive services for LMI households

Community members further provided feedback through the Community Needs Survey. The highest areas of need identified were:

- Safety Improvements (Roads/Sidewalks/Lighting/Safe Parking) (62.81 percent)
- Affordable Housing (62.31 percent)
- Services for the Homeless (42.71 percent)
- Housing (30.15 percent)
- Infrastructure Improvements (Sewer/Water/Stormwater) (28.14 percent)
- Youth Issues (23.62 percent)
- Senior Issues (20.10 percent)

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments were accepted.

7. Summary

Through coordination of the ConPlan process, along with other pertinent planning efforts in the City and the incorporation of City Staff's experience in operating CDBG and HOME programs, the City of Bethlehem believes it has developed a workable, effective road map for the use of HUD resources over the next five years. The needs and strategic priorities identified in this ConPlan will maximize the impact of available resources while improving the lives of residents.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	BETHLEHEM	
CDBG Administrator	BETHLEHEM	Department of Community and Economic Development
HOME Administrator	BETHLEHEM	Department of Community and Economic Development
ESG Administrator		

Table 1 – Responsible Agencies

Narrative

The City of Bethlehem's Department of Community and Economic Development is responsible for the ConPlan and the administration of the associated CDBG and HOME grants.

Consolidated Plan Public Contact Information

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)

1. Introduction

The City of Bethlehem views the ConPlan and Annual Action Plan as an opportunity to engage the community in the CDBG and HOME investment process. The City encourages residents to voice their needs and concerns regarding homelessness, affordable housing, and community development. All members of the public, especially those living in low- to moderate-income neighborhoods, are encouraged to participate in the planning process. The goal of the consultation process undertaken was to gather data to help determine the City's priority needs. In addition, the City also continues to coordinate and collaborate with social service providers to identify specific needs or vulnerable populations.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

- The City of Bethlehem collaborates with other local governments, nonprofits, advocacy groups, and citizens on its housing and community development efforts. This collaboration includes working with the Bethlehem Housing Authority (BHA), involvement with the Northside 2027 Neighborhood Plan, and involvement with the Bethlehem Blight Betterment (B3) Initiative. In addition, the City works closely with various service agencies and consulted these agencies in the development of this ConPlan. These included a variety of agencies, both local and regional nonprofits, government organizations, faith-based organizations, and other organizations involved in broadband services, the development of affordable housing, creation of job opportunities for low- and moderate-income residents, and/or provision of services to youth, elderly persons, persons with disabilities, homeless persons, and victims of domestic violence. To facilitate this consultation, the City solicited feedback through the following methods:
 - Stakeholder interview and roundtable discussions
 - Community meeting
 - Public hearing
 - Receipt of written comments

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The City of Bethlehem participates in the Lehigh Valley Regional Homeless Advisory Board (RHAB), which is part of the Eastern Pennsylvania Continuum of Care (CoC). Through collaboration with the RHAB, the City is charged with devising a community plan meant to organize and deliver housing and services to meet the specific needs of homeless persons as they move to stable housing and maximum self-

sufficiency. Additional focus is placed on chronically homeless individuals and families, families with children, veterans, and unaccompanied youth.

On March 9, 2023, the CoC published Written Standards for organizations delivering housing and services to persons experiencing homelessness or persons at-risk of homelessness in the Eastern Pennsylvania CoC. The City of Bethlehem and its homeless service provider partners abide by the CoC's standards.

In addition, the Eastern Pennsylvania CoC conducts an annual Point-in-Time (PIT) Count each January. The PIT Count includes persons residing in shelters, residing in transitional housing, and those who are unsheltered. Data is available for both Lehigh and Northampton Counties.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The City of Bethlehem does not receive ESG funds from HUD. The City relies on Lehigh County, Northampton County, and nonprofit organizations and service providers to perform these social service functions.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Astound
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers
	What section of the Plan was addressed by Consultation?	Broadband
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Astound participated in the stakeholder engagement process and provided an assessment of broadband capabilities and needs in Bethlehem.
2	Agency/Group/Organization	ARTSQUEST
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Education
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	ArtsQuest participated in the stakeholder engagement process and provided an assessment of community needs from their perspective as a service provider and facility operator.
3	Agency/Group/Organization	Bethlehem Area Public Library
	Agency/Group/Organization Type	Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Bethlehem Area Public Library participated in the stakeholder engagement process and provided an assessment of community needs from their perspective as an important public facility and service provider.
4	Agency/Group/Organization	Bethlehem Area School District
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Bethlehem Area School District participated in the stakeholder engagement process and provided an assessment of community needs from their perspective as a public facility and service provider.
5	Agency/Group/Organization	Bethlehem Emergency Sheltering, Inc.
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Bethlehem Emergency Sheltering participated in the stakeholder engagement process and provided an assessment of community needs from their perspective as a public facility and service provider.
6	Agency/Group/Organization	Bradbury Sullivan Center
	Agency/Group/Organization Type	Services-Children Services-Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Bradbury Sullivan Center participated in the stakeholder engagement process and provided an assessment of community needs from their perspective as a service provider.
7	Agency/Group/Organization	Center for Humanistic Change
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Center for Humanistic Change participated in the stakeholder engagement process and provided an assessment of community needs from their perspective as a service provider.

8	Agency/Group/Organization	City of Bethlehem Department of Community and Economic Development
	Agency/Group/Organization Type	Other government - Local Planning organization Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City's Department of Community and Economic Development operates the CDBG and HOME programs and maintains an ongoing dialogue regarding community needs with other City departments, with housing and service providers, and with the community at large.
9	Agency/Group/Organization	City of Bethlehem Department of Planning and Zoning
	Agency/Group/Organization Type	Other government - Local Planning organization Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City's Department of Planning and Zoning participated in the stakeholder engagement process and has ongoing dialogue with the Community Development Program and other City departments.
10	Agency/Group/Organization	City of Bethlehem Department of Public Works
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Other government - Local Grantee Department

	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City's Department of Public Works participated in the stakeholder engagement process and has ongoing dialogue with the Community Development Program and other City departments.
11	Agency/Group/Organization	Community Action Committee of the Lehigh Valley
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Community Action Development Corporation of Bethlehem participated in the stakeholder engagement process and provided an assessment of community needs from their perspective as a service provider.
12	Agency/Group/Organization	Greater Lehigh Valley REALTORS
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Greater Lehigh Valley Realtors participated in the stakeholder engagement process and provided an assessment of community needs from their perspective as a housing provider.
13	Agency/Group/Organization	Hispanic Center of the Lehigh Valley
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Education Services-Employment Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Hispanic Center of the Lehigh Valley participated in the stakeholder engagement process and provided an assessment of community needs from their perspective as a facility operator and service provider.
14	Agency/Group/Organization	Lehigh Valley Health Network
	Agency/Group/Organization Type	Services-Health Regional organization
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The LVHN participated in the stakeholder engagement process as a publicly funded healthcare facility, and provided an assessment of community needs from their perspective as a medical service provider in Bethlehem.
15	Agency/Group/Organization	Lehigh Valley Planning Commission
	Agency/Group/Organization Type	Housing Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Lehigh Valley Planning Commission participated in the stakeholder engagement process and provided an assessment of community needs from their perspective as local planners.
16	Agency/Group/Organization	ShareCare Faith in Action
	Agency/Group/Organization Type	Services-Elderly Persons Services-Health Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	ShareCare Faith in Action participated in the stakeholder engagement process and provided an assessment of community needs from their perspective as a service provider.

17	Agency/Group/Organization	Turning Point of Lehigh Valley
	Agency/Group/Organization Type	Services-Victims of Domestic Violence Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Turning Point of Lehigh Valley participated in the stakeholder engagement process and provided an assessment of community needs from their perspective as a service provider.
18	Agency/Group/Organization	VIA of the Lehigh Valley
	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Services-Education Services-Employment Regional organization
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	VIA of the Lehigh Valley participated in the stakeholder engagement process and provided an assessment of community needs from their perspective as a service provider.
19	Agency/Group/Organization	Greater Valley YMCA - Bethlehem Branch
	Agency/Group/Organization Type	Housing Services-homeless Services-Health Services-Education Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The YMCA participated in the stakeholder engagement process and provided an assessment of community needs from their perspective as a service provider and facility.

20	Agency/Group/Organization	YWCA
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	YWCA participated in the stakeholder engagement process and provided an assessment of community needs from their perspective as a service provider.
21	Agency/Group/Organization	Bethlehem Housing Authority
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Bethlehem Housing Authority, the local public housing authority, participated in the stakeholder engagement process and provided an assessment of community needs from their perspective as a service provider.
22	Agency/Group/Organization	Lehigh County Emergency Management Department
	Agency/Group/Organization Type	Other government - County Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lehigh County Emergency Management Agency participated and provided their 2024 Mitigation Plan

Identify any Agency Types not consulted and provide rationale for not consulting

No agency types were excluded from consultation.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Eastern Pennsylvania CoC	With input into CoC functions through the Lehigh Valley Regional Homeless Advisory Board, the City of Bethlehem helps to shape CoC plans and identifies opportunities for CDBG funds to complement CoC efforts.
Northside 2027 Neighborhood Plan	City of Bethlehem	Community input and needs analysis for the portion of the City covered by this Plan resulted in proposed actions that, in turn, helped shape overall goals for the City's CDBG and HOME programs for the next five years. The City is planning to designate this neighborhood a Neighborhood Revitalization Strategy Area under the CDBG program to enhance that program's impact on this neighborhood.
Bethlehem Bligh Betterment (b3) Initiative	City of Bethlehem	Community input, analysis and recommendations contained in this plan provided some direction for CDBG community development efforts citywide, particularly in the areas of neighborhood stabilization and land use and re-use possibilities.
City Bethlehem Strategic Plan to End Homelessness	City of Bethlehem	The Strategic Plan to End Homelessness highlights the causes of homelessness in the City and determined the most effective ways for the City to play an active role in addressing homelessness within the City and region, based on data-driven analysis. Conclusions drawn in this report were used to inform decisions about homeless support and services in the City.
Pembroke Choice Neighborhood Market Study and Study	City of Bethlehem	Through the City and the Bethlehem Housing Authority (BHA), the City's Pembroke Neighborhood was awarded a HUD Choice Neighborhoods (CN) Planning Grant to support the revitalization of distressed public housing.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

The City of Bethlehem is located in both Lehigh County and Northampton County and is informed of community development efforts on the County level by both jurisdictions. Care is taken to avoid duplication of efforts, particularly with subrecipients who receive support from two or more of these CDBG entitlements. Similarly, the City remains up to date and aware of the State of Pennsylvania's CDBG and HOME program plans and is of the opinion that this ConPlan is consistent with state efforts regarding such programs.

Narrative (optional):

Through the multi-pronged efforts described above, the City of Bethlehem believes it has collected a wide range of community perspectives and information that has provided the City with the breadth and depth of information needed to produce a comprehensive strategy, presented in this ConPlan, for applying CDBG and HOME resources in an efficient, effective and coordinated Community Development program.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

The citizen participation process involved a community survey (in both English and Spanish), two public meetings, stakeholder interviews and roundtable discussions, and a public hearing. Outreach efforts included using the City's website as an information repository for posts as well as emailing community stakeholders. The Community Needs Survey was open to the public from October 2024 through December 2024. The City received 199 responses in total. Community meetings for this ConPlan were held on November 6, 2024, and December 2, 2024, both through online formats. Stakeholder interviews and roundtables occurred throughout October of 2024 via video-conferencing calls with representatives from various agencies.

The City published notice for public hearings and provided a 30-day public review of the FY 2025-2029 ConPlan on the City's website and local newspaper. The Draft ConPlan was also made available for review on the City's website. A public hearing was held on July 1, 2025.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Internet Outreach	Non-targeted/broad community	Community Needs Survey ran from October 2024 to December 2024 and was available in English	199 responses were accepted	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Internet Outreach	Non-targeted/broad community	The Citys Community Needs Survey ran from October 2024 to December 2024 and was available in Spanish	All comments were accepted	na	
3	Public Meeting	Non-targeted/broad community	City held a ConPlan kickoff meeting to inform the public of the Citys planning efforts on October 25, 2024.	All comments accepted	n/a	
4	Public Meeting	Non-targeted/broad community	City held five stakeholder roundtable discussions on October 15, 16, 18, and 21, 2024	All comments accepted	na	
5	Public Meeting	Non-targeted/broad community	The City held two public meetings on November 6 and December 2, 2024 to gather feedback on proposed needs and goals	All comments accepted	na	

6	Newspaper Ad	Non-targeted/broad community	All comments accepted, these included several mail questions in July: Are the grant funds for a one year period or are they spread out over five years? How are the grant funds being used to benefit the qualified census tracts (105, 108, 110, 112)? How does the city identify households with inadequate kitchen and plumbing facilities? How are the cost burden statistics generated? The goals are very vague. Are there specific non-Northside 2027 projects planned? The Analysis of Impediments (AI) report claims there are systemic unfair housing practices in	All comments accepted	n/a	
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
			the city. The claims seem to be based on outside reports and data, and some questionable real estate advertisements. Can you share any other insights?			

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

This section of the ConPlan provides a summary of Bethlehem's needs related to affordable housing, special needs housing, community development, and homelessness. The Needs Assessment includes the following sections:

- Housing Needs Assessment
- Disproportionately Greater Need
- Public Housing
- Homeless Needs Assessment
- Non-Homeless Needs Assessment
- Non-Housing Community Development Needs

The Needs Assessment identifies the needs with the highest priority, which forms the basis for the Strategic Plan section and the subsequent programs and projects undertaken. Data analyzed throughout the Needs Assessment is primarily from HUD's 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) dataset and 2016-2020 5-Year Estimates from the American Community Survey (ACS).

During the five-year period covered by the 2025-2029 ConPlan, the City of Bethlehem will undertake the following activities to address its various housing and community development needs:

- Improve existing housing stock, both rental and owner-occupied.
- Increase homeownership opportunities.
- Improve public spaces, including parks, streets, and other infrastructure.
- Enhance public safety through services and environmental improvements such as lighting.
- Support economic development, including infrastructure improvements to commercial areas serving nearby residential neighborhoods and through support for commercial facade improvements.
- Support neighborhood stabilization efforts and blight elimination initiatives through increased code enforcement and property clearance or rehabilitation programs.
- Support a wide range of eligible public services and facilities, including affordable childcare, before- and after-school programming, job readiness services, mental health services, child nutrition services, financial literacy programs (including foreclosure prevention) and food pantries and homeless shelters.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The following narratives and tables describe the characteristics of Bethlehem's low- to moderate-income (LMI) and special needs households. Of the City's 29,360 households, nearly 49 percent are LMI, earning between 0 to 80 percent of the area median income (AMI). The highest identified housing need in the City of Bethlehem is increased affordable housing opportunities. HUD's Comprehensive Housing Affordability Strategy (CHAS) dataset identifies four housing problems: (1) lack of complete kitchen facilities, (2) lack of complete plumbing facilities, (3) cost burden, and (4) overcrowding. The most common housing problem faced by residents in the City is cost burden, with approximately 61 percent of the City's LMI households expending 30 percent or more of their gross household income on housing costs. Renters in particular face higher rates of cost burden and other housing problems. Of the 8,712 LMI households experiencing cost burden, nearly 75 percent are renters. The majority of these renter households are extremely low-income as well, earning between 0 to 30 percent AMI.

This section also provides an overview of housing problems faced by special needs populations, including elderly households, persons with disabilities, victims of domestic violence, and households who were either previously homeless or who are at imminent risk of becoming homeless.

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	75,000	75,570	1%
Households	29,145	29,360	1%
Median Income	\$47,291.00	\$56,034.00	18%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	4,790	3,750	5,710	2,830	12,285
Small Family Households	1,195	1,285	1,880	1,110	5,570
Large Family Households	295	300	220	170	610
Household contains at least one person 62-74 years of age	1,220	705	1,480	600	2,945
Household contains at least one person age 75 or older	904	665	970	295	1,219
Households with one or more children 6 years old or younger	865	705	510	305	900

Table 6 - Total Households Table

Data Source: 2016-2020 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	125	45	35	0	205	10	40	0	0	50
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	55	0	0	0	55	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	60	85	55	50	250	15	15	0	25	55
Housing cost burden greater than 50% of income (and none of the above problems)	1,690	965	115	0	2,770	325	275	295	35	930

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	765	1,030	1,635	105	3,535	245	445	575	200	1,465
Zero/negative Income (and none of the above problems)	250	0	0	0	250	95	0	0	0	95

Table 7 – Housing Problems Table

Data 2016-2020 CHAS
 Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,925	1,095	200	50	3,270	350	330	295	60	1,035
Having none of four housing problems	2,085	1,440	2,995	1,320	7,840	435	880	2,220	1,395	4,930
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Table 8 – Housing Problems 2

Data 2016-2020 CHAS
 Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	675	935	745	2,355	145	145	245	535
Large Related	240	155	45	440	15	110	34	159
Elderly	850	380	475	1,705	365	340	423	1,128
Other	865	625	505	1,995	65	160	170	395
Total need by income	2,630	2,095	1,770	6,495	590	755	872	2,217

Table 9 – Cost Burden > 30%

Data 2016-2020 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	405	405	85	55	0	140
Large Related	0	0	35	35	15	0	0	15
Elderly	550	235	30	815	195	135	234	564
Other	0	735	295	1,030	45	0	0	45
Total need by income	550	970	765	2,285	340	190	234	764

Table 10 – Cost Burden > 50%

Data 2016-2020 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	150	85	55	50	340	10	35	0	0	45

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Multiple, unrelated family households	0	0	0	0	0	4	0	0	25	29
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	150	85	55	50	340	14	35	0	25	74

Table 11 – Crowding Information – 1/2

Data 2016-2020 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source
Comments:

Describe the number and type of single person households in need of housing assistance.

According to 2016-2020 ACS estimates, there are 9,707 single person households in the City of Bethlehem, representing approximately 33 percent of all Bethlehem households. About 58 percent of single person households are renters, while almost 42 percent are homeowners. In addition, nearly 38 percent of single person households in the City are seniors aged 65 and older. As compared with other residents, the housing needs of these single person elderly households may be associated with additional difficulties due to living on fixed incomes and/or potentially having special housing needs or other care needs.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Persons with Disabilities:

According to 2016-2020 ACS 5-Year estimates, 14.2 percent (10,564 persons) of the population living in Bethlehem has one or more disabilities. The most prevalent disability affecting the population is ambulatory difficulty (7.1 percent), followed by cognitive difficulty (6.7 percent), independent living difficulty (6.1 percent), hearing difficulty (3.1 percent), self-care difficulty (2.7 percent), and vision difficulty (2.6 percent). The majority of people with disabilities in the City are seniors aged 75 years and

over, representing 44 percent of the population with disabilities.

The symptoms and functional impairments that result from disabling health and behavioral conditions can make it difficult for people to earn income from employment. Income from disability benefits, such as Supplemental Security Income, is not always sufficient to afford housing payments without additional assistance. According to the National Disability Institute, working-aged people with disabilities are less likely to be employed compared to their non-disabled counterparts across every racial and ethnic group. During stakeholder interviews and roundtables, stakeholders expressed a need to support housing initiatives for medically complex individuals who require long-term care and cannot use vouchers.

Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking:

Assessing the number of people in the City who are impacted by domestic violence, dating violence, sexual assault, and stalking can be difficult due to limitations in data and underreporting. The Center for Disease Control (CDC) reports a lifetime prevalence of any time of sexual violence, physical violence, and/or stalking by an intimate partner affecting 48.7 percent of women and 41.9 percent of men in Pennsylvania, based on 2016-2017 annualized estimates. According to the Pennsylvania Coalition Against Domestic Violence (PCADC) reports that eight people lost their lives due to domestic violence in Lehigh County and four in Northampton County between 2020 and 2023. Data relating to domestic violence and sexual assault specific to the City of Bethlehem is unavailable.

According to the 2024 Eastern Pennsylvania CoC Point-in-Time (PIT) Count, almost nine percent (32 people) of the homeless population surveyed in Lehigh County were victims of domestic violence. In Northampton County, approximately six percent (21 people) were victims of domestic violence.

What are the most common housing problems?

Housing problems identified and assessed by HUD's CHAS dataset includes the following:

- Housing units lacking complete kitchen facilities
- Housing units lacking complete plumbing facilities
- Overcrowding (more than one person per room)
- Cost burden (spending 30 percent or more of household income on housing costs)

According to 2016-2020 CHAS data and as shown in Table 7 (Housing Problems), housing cost burden is the most common housing problem experienced by Bethlehem residents earning between 0 to 100 percent of the area median income (AMI), regardless of tenure.

While cost burden is defined as spending 30 percent or more of a household's income on housing costs, severe cost burden is experienced when a household spends 50 percent or more of their income on housing. When examining households that experience just one of the four housing problems, approximately 30 percent of households earning between 0 to 100 percent AMI are experiencing some level of cost burden. Cost burden impacts the City's residents earning between 0 to 100 percent AMI as shown below:

- Cost burden: 5,000 households (17.02 percent of all households)
 - o Renters: 3,535 households
 - o Owners: 1,465 households
- Severe cost burden: 3,700 households (12.6 percent of all households)
 - o Renters: 2,770 households

o Owners: 930 households

Notwithstanding the following: The City's 2023 Opening Doors housing study found that residents earning up to 150% AMI are impacted by cost burden, with 45% of all renters experiencing cost burden compared to 18% of homeowners. One in five (20%) renters is severely cost burdened, paying more than 50% of their income on rent.

The second most frequent housing problem experienced by the City's residents is overcrowding, affecting approximately two percent of households earning between 0 to 100 percent AMI. Moderately overcrowded households are defined as households in which each room has 1.01 to 1.5 persons, while severely overcrowded households are defined as households in which each room has more than 1.51 persons. Couples and small children are excluded from overcrowding calculations. Overcrowding impacts the City's residents earning between 0 to 100 AMI as shown below:

- Overcrowding: 305 households (1.03 percent of all households)

o Renters: 250 households

o Owners: 55 households

- Severe overcrowding: 55 households (0.18 percent of all households)

o Renters: 55 households

o Owners: No households

While homeowner households do not experience severe overcrowding issues, this group does experience substandard housing issues, though at a lesser level than renters. Owning a house is associated with higher upkeep costs, as homeowners need to pay out-of-pocket for repairs due to wearing or damage. Fifty percent of owner households in the City struggle with substandard housing issues, either lacking complete plumbing or complete kitchen facilities, 20 percent of which are extremely low-income and 80 percent of which are very low-income.

Are any populations/household types more affected than others by these problems?

In all, the City has 9,745 renter households earning between 0 to 80 percent AMI and 4,505 owner households earning between 0 to 80 percent AMI. Housing cost burden is the most significant housing problem faced by Bethlehem residents, affecting almost 32 percent of the total population, regardless of income or tenure. However, renters in the City are experiencing cost burden at higher rates than their homeowner neighbors. Overall, approximately 67 percent of low-income renter households (0 to 80 percent AMI) are cost burdened to some degree. Further, cost burden in Bethlehem is most experienced by small, related households and elderly households. Of the City's 4,360 small, related households earning 0 to 80 percent AMI, approximately 66 percent are cost burdened. Similarly, nearly 48 percent of the City's 5,947 elderly households earning between 0 to 80 percent AMI are cost burdened.

According to 2016-2020 CHAS data and as shown in Table 8 (Housing Problems 2), more renter households in the City are affected by severe housing problems as compared to owner households as well. Approximately 29 percent of renter households earning between 0 to 100 percent AMI experience one or more of the four severe housing problems, while approximately 17 percent of owner households of the same income level experience one or more of the four severe housing problems.

Housing cost burden prevalence is also correlated with household income for the City's renter population. The majority of cost burdened renter households in the City have the lowest incomes. Of

the 6,495 households who are cost burdened and are extremely low- to low-income, 40.49 percent are extremely low-income, 32.25 percent are very low-income, and 27.25 percent are low-income.

Crowding is the second most prevalent housing problem faced by the City's residents. Overcrowding is defined by HUD as a household living in a housing unit with one or more persons per room. As with cost burden, more renter households are experiencing crowding as compared to homeowners. 82 percent of overcrowded households in the City are renters. The majority of these households across both renters and owners, almost 93 percent, are single family households.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Extremely low-income households, earning between 0 to 30 percent AMI, represent approximately 16 percent of all households in the City. Of these 4,790 households, approximately 18 percent have children aged six years or younger. Of all households with children aged six years or younger, the majority are extremely low-income. Extremely low-income households with young children may face particular risks of becoming homeless, residing in shelters, or becoming unsheltered, due to trying to balance the cost of housing, childcare, and healthcare with work schedule times. The largest proportion of extremely low-income households in the City are elderly households (44.34 percent), defined as households containing at least one person aged 62 or older. Small family households (24.94 percent) follow this. In all, there are 2,630 extremely low-income renter households facing cost burden; 550 facing severe cost burden; 150 facing overcrowding.

Rapid Re-Housing is an interventional program that seeks to quickly move unhoused individuals and families into housing and subsequently provides a short-term housing subsidy and other housing-related services that are needed. According to HUD, the program's target populations do not include those who experience chronic homelessness or households in need of a therapeutic residential environment, such as those recovering from addiction. Households who meet these criteria will therefore need additional supportive services to ensure stability during their Rapid Re-Housing program exit, such as permanent housing support or addiction recovery services. Furthermore, service providers indicate they are seeing households remain in Rapid Re-Housing longer due to the lack of affordable rental units for households to move into.

While the City of Bethlehem does not operate its own Rapid Re-Housing Program, it actively works with the City's Continuum of Care (CoC), Lehigh County, Northampton County, and regional organizations to identify permanent affordable housing placement and solutions. However, Bethlehem's 2023 Strategic Plan to Address Homelessness (SPA) identified that the Lehigh Valley (Lehigh and Northampton Counties) has a current inventory of 244 permanent supportive housing units, despite an existing need for 497 households. During the creation of the SPA, homeless individuals were surveyed. When asked about leaving their last secure home, 20 percent of respondents reported that they were evicted and/or forced to leave due to crowding, condemnation, or landlord issues. The Lehigh Valley Planning

Commission (LVPC) estimates a deficit of 14,480 housing units for households with incomes under \$25,000.

This suggests a need for increased permanent supportive housing units, additional supportive services for the homeless population exiting Rapid Re-Housing programs, and an overall increase of housing units that are affordable to households earning extremely low-income wages.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

N/A

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Housing characteristics most commonly linked to instability and increased risk of homelessness include elevated levels of cost burden (the gap between income and the cost of housing), a tight rental market, and a shortage of affordable housing. These factors are further compounded by loss of income, unemployment, and personal circumstances such as significant life changes, physical health conditions, mental illness, substance abuse, and trauma. During the development of the City of Bethlehem's Strategic Plan to Address Homelessness, interviews with the homeless population and with homeless service providers revealed that a lack of affordable housing and the affordability crisis is believed to be the most significant issue facing the unsheltered population.

The Eastern Pennsylvania Continuum of Care's (CoC) 2024 Point-in-Time (PIT) Count reports data on a surveyed proportion of the homeless population in each County, including Lehigh County and Northampton County respectively. According to the 2024 Lehigh County PIT Count, 7.2 percent of the surveyed population in the County reported severe mental illness, 1.9 percent reported chronic substance abuse, 1.1 percent reported having HIV/AIDS, 1.4 percent were veterans, and 8.9 percent were victims of domestic violence. For Northampton County, 8.4 percent of the surveyed homeless population reported severe mental illness, 2.1 percent reported chronic substance abuse, 6.1 percent were veterans, and 6.4 percent were victims of domestic violence.

Discussion

The above analysis finds that low- to moderate-income households, particularly renters and those who are extremely low-income, experience housing problems at a greater rate than higher income households and homeowner households. Across all income levels, residents of the City of Bethlehem struggle the most with cost burden, wherein a household is expending 30 percent or more of their gross income on housing costs. These findings indicate a lack of affordable housing options relative to the incomes of low-income renters, especially those who are extremely low-income.

Results from the community engagement process for this ConPlan further corroborates this finding of limited affordable housing options in the City. When asked to rate affordable housing options available

in the Community, approximately 46 percent of Community Survey respondents selected “poor” while almost 40 percent selected “fair.” Less than 15 percent of respondents rated affordable housing options in the City as “excellent” or “good.” Further, when asked about initiatives or programs that residents believed would be most effective in addressing housing inequalities in the City, nearly 71 percent selected affordable housing development. The Community Needs Survey also asked community members about areas of need for improvements. Approximately 62 percent selected affordable housing. Consistently, affordable housing initiatives and concerns received high marks in the Community Needs Survey, reflecting almost unanimous feedback from participating community members across the board.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This ConPlan defines disproportionately greater need as follows: when the percentage of people in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in the category as a whole.

As defined by HUD, the four housing problems include:

- Lack of complete kitchen facilities
- Lack of complete plumbing facilities
- More than one person per room (crowding)
- Cost burden exceeding 30 percent of monthly gross income

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,285	1,510	0
White	1,535	665	0
Black / African American	280	59	0
Asian	29	20	0
American Indian, Alaska Native	15	0	0
Pacific Islander	0	0	0
Hispanic	1,350	760	0

Table 13 - Disproportionately Greater Need 0 - 30% AMI

Data Source: 2016-2020 CHAS

*The four housing problems are:

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

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,900	850	0
White	1,340	580	0
Black / African American	415	34	0
Asian	100	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	930	215	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2016-2020 CHAS
 Source:

*The four housing problems are:

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

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,705	3,000	0
White	1,805	2,000	0
Black / African American	145	255	0
Asian	130	44	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	580	585	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2016-2020 CHAS
 Source:

*The four housing problems are:

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

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	420	2,405	0
White	290	1,575	0
Black / African American	10	204	0
Asian	34	89	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	75	500	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

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

Discussion

The following summarizes the needs of racial and ethnic group households by income bracket. Racial and ethnic household groups who experienced housing problems at disproportionate rates are in bold. Numbers are rounded to the nearest whole number.

69 percent of households with 0 to 30 percent AMI (0-30% AMI) experienced one or more of the four housing problems.

- 70 percent of White households experienced at least one housing problem.
- 83 percent of Black or African American households experienced at least one housing problem.
- 59 percent of Asian households experienced at least one housing problem.
- 100 percent of American Indian or Alaska Native households experienced at least one housing problem.
- No Pacific Islander households were reported in the data.
- 64 percent of Hispanic households experienced at least one housing problem.

77 percent of households with 30 to 50 percent AMI (30-50% AMI) experienced one or more of the four housing problems.

- 70 percent of White households experienced at least one housing problem.
- 92 percent of Black or African American households experienced at least one housing problem.
- 83 percent of Asian households experienced at least one housing problem.
- No American Indian or Alaska Native households were reported in the data.
- No Pacific Islander households were reported in the data.
- 81 percent of Hispanic households experienced at least one housing problem.

47 percent of households with 50 to 80 percent AMI (50-80% AMI) experienced one or more of the four housing problems.

- 47 percent of White households experienced at least one housing problem.
- 36 percent of Black or African American households experienced at least one housing problem.
- 75 percent of Asian households experienced at least one housing problem.
- No American Indian or Alaska Native households were reported in the data.
- No Pacific Islander households were reported in the data.
- 50 percent of Hispanic households experienced at least one housing problem.

15 percent of households with 80 to 100 percent AMI (80-100% AMI) experienced one or more of the four housing problems.

- 16 percent of White households experienced at least one housing problem.
- Five percent of Black or African American households experienced at least one housing problem.
- 28 percent of Asian households experienced at least one housing problem.
- No American Indian or Alaska Native households were reported in the data.
- No Pacific Islander households were reported in the data.
- 13 percent of Hispanic households experienced at least one housing problem.

In summary, disproportionately greater need was identified in extremely low-income (0 to 30 percent AMI) Black or African American households and American Indian or Alaska Native households. While very low-income (30 to 50 percent AMI) Black/African American households are most disproportionately affected by housing problems, all racial and ethnic groups within this AMI range are largely affected, ranging from 70% of White households up to 92% of Black/African American households. This includes Hispanic households, in which 81% are disproportionately affected by housing.

Please note: The City of Bethlehem's current reality of housing and economic conditions, reflected through the City's 2023 Opening Doors housing study, may contradict that which is demonstrated through the above data sets. This discrepancy is due to lags in federal data sets exacerbated by the City's rapidly shifting housing and economic conditions post-COVID.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205**(b)(2)**

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section assesses whether racial or ethnic groups have disproportionately greater severe housing needs than the general population. For this ConPlan, disproportionately greater need is assumed to exist when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in the category as whole. As defined by HUD, severe housing problems include:

- â€¢ Lack of complete kitchen facilities
- â€¢ Lack of complete plumbing facilities
- â€¢ More than 1.5 persons per room (severe crowding)
- â€¢ Cost burden exceeding 50 percent of monthly gross income (severe cost burden)

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,275	2,520	0
White	1,160	1,035	0
Black / African American	230	109	0
Asian	24	24	0
American Indian, Alaska Native	15	0	0
Pacific Islander	0	0	0
Hispanic	765	1,345	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2016-2020 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,425	2,320	0
White	645	1,270	0
Black / African American	305	144	0
Asian	25	95	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	390	755	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	495	5,215	0
White	440	3,360	0
Black / African American	4	400	0
Asian	25	150	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	24	1,150	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	110	2,715	0
White	50	1,825	0
Black / African American	0	214	0
Asian	15	110	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	45	530	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

The following is an analysis of the rates of severe housing problems experienced among racial and ethnic groups by income bracket. Racial and ethnic groups experiencing severe need at a disproportionate rate are bolded. Numbers are rounded to the nearest whole number.Â

47 percent of households with 0 to 30 percent AMI (0-30% AMI) experienced one or more of the four severe housing problems.Â

- 53 percent of White households experienced at least one severe housing problem.Â
- **68 percent of Black or African American households experienced at least one severe housing problem.Â**
- 50 percent of Asian households experienced at least one severe housing problem.Â
- **100 percent of American Indian or Alaska Native households experienced at least one severe housing problem.Â**
- No Pacific Islander households experienced a severe housing problem.Â
- 36 percent of Hispanic households experienced at least one severe housing problem.Â

38 percent of households with 30 to 50 percent AMI (30-50% AMI) experienced one or more of the four severe housing problems.Â

- 34 percent of White households experienced at least one severe housing problem.Â
- **68 percent of Black or African American households experienced at least one severe housing problem.Â**
- 21 percent of Asian households experienced at least one severe housing problem.Â
- No American Indian or Alaska Native households were reported in the data.Â
- No Pacific Islander households were reported in the data.Â
- 34 percent of Hispanic households experienced at least one severe housing problem.Â

Nine percent of households with 50 to 80 percent AMI (50-80% AMI) experienced one or more of the four severe housing problems.Â

- 12 percent of White households experienced at least one severe housing problem.Â
- One percent of Black or African American households experienced at least one severe housing problem.Â
- 14 percent of Asian households experienced at least one severe housing problem.Â
- No American Indian or Alaska Native households were reported in the data.Â
- No Pacific Islander households were reported in the data.Â
- Two percent of Hispanic households experienced at least one severe housing problem.Â

Four percent of households with 80 to 100 percent AMI (80-100% AMI) experienced one or more of the four severe housing problems.Â

- Three percent of White households experienced at least one severe housing problem.Â
- No Black or African American households experienced a severe housing problem.Â
- 12 percent of Asian households experienced at least one severe housing problem.
- No American Indian or Alaska Native households were reported in the data.Â
- No Pacific Islander households were reported in the data.Â
- Eight percent of Hispanic households experienced at least one severe housing problem.Â

In summary, disproportionate rates of severe housing problems were identified in Black or African American extremely low-income (0 to 30 percent AMI) and very low-income (30 to 50 percent AMI) households. Additionally, extremely low-income American Indian or Alaska Native households were also found to be experiencing disproportionately greater need due to severe housing problems.Â

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

Housing cost burden is defined as a household spending 30 percent or more of their gross income on housing expenses. A severe cost burden exists when a household expends 50 percent or more of their income on housing costs. A disproportionately greater need is assumed to exist when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in the category as a whole.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	19,665	5,435	3,885	375
White	14,040	2,960	2,150	185
Black / African American	960	360	475	20
Asian	385	215	59	20
American Indian, Alaska Native	10	0	15	0
Pacific Islander	0	0	0	0
Hispanic	4,015	1,775	1,090	145

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2016-2020 CHAS

Discussion:

Cost burden occurs when households are spending a disproportionate amount of their gross income on housing costs, leaving them with insufficient funds to pay for other necessities such as food, healthcare costs, and transportation. Moderate cost burden is defined as a household expending 30 to 50 percent of their household income on housing costs, while severe cost burden is defined as a household expending 50 percent or more of their household income on housing costs. Overall, 31.8% of City of Bethlehem households, regardless of income bracket or tenure, are cost burdened with 13% severely cost burdened.

Analysis on 2016-2020 CHAS data presented in Table 21, above, finds that 46.5% of Black/African American households are cost burdened and as many as 26.4% severely cost burdened. Asian households in the City are disproportionately impacted by cost burden, with 41.6% of Asian households paying more than 30% of their income on housing costs. Hispanic households also face disproportionate

levels of cost burden, with 41.6% paying more than 30% of their income on housing and nearly a third (28%) severely cost burdened. This means that relative to the general population, these racial groups are facing higher rates of moderate cost burden or severe cost burden, respectively.

Please note: The City of Bethlehem's current reality of housing and economic conditions, reflected through the City's 2023 Opening Doors housing study, may contradict that which is demonstrated through the above data sets. This discrepancy is due to lags in federal data sets exacerbated by the City's rapidly shifting housing and economic conditions post-COVID.

Not notwithstanding the following: The City's 2023 Opening Doors housing study found that the vast majority of the City is unaffordable to households making 120% AMI (and, in many instances, even 150% AMI). This means the vast majority of households earning 120% AMI are cost burdened, or paying more than 30% of their income on housing. There are no block groups within the City categorized as affordable for households earning 80% AMI or below while the only block groups affordable for households earning 100% AMI are within portions of south Bethlehem and northeast Bethlehem.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

NA-15 identified the following disproportionately greater needs for housing problems:

- 0-30% AMI: Black/African American households and American Indian/Alaska Native households have disproportionately greater need.
- 30-50% AMI: Black/African American households have disproportionately greater need.
- 50-80% AMI: Asian households have disproportionately greater need.
- 80-100% AMI: Asian households have disproportionately greater need.

NA-20 identified the following disproportionately greater needs for severe housing problems:

- 0-30% AMI: Black/African American households and American Indian/Alaska Native households have disproportionately greater need.

NA-25 identified the following disproportionately greater needs for housing cost burdens:

- Asian households are disproportionately cost burdened at a moderate degree, spending 30 percent 50 percent of income on housing costs.
- Black/African American households and American Indian/Alaska Native households are disproportionately cost burdened at a severe degree, spending 50 percent or more of income on housing costs.

If they have needs not identified above, what are those needs?

No additional needs identified

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

According to the HUD definition, the City of Bethlehem has two racially or ethnically concentrated areas of poverty (R/ECAPs). These are census tracts with a non-white population of 50 percent or more and a poverty rate that either exceeds 40 percent of the population or is three or more times higher than the average tract poverty rate for the metropolitan area. Each of the City's R/ECAPs are located in Northampton County. These included Census Tracts 105 and 110.

The City's Pembroke Neighborhood, a neighborhood for which the City and the Bethlehem Housing Authority were awarded a HUD Choice Neighborhoods (CN) Planning Grant for public housing revitalization, is in Census Tract 105. Both Census Tracts 105 and 110 have a high area deprivation index (ADI), indicating a high rate of socioeconomic disadvantage when compared to the rest of the State.

NA-35 Public Housing – 91.205(b)

Introduction

The Bethlehem Housing Authority (BHA) is the local entity that manages and maintains public housing units and administers Housing Choice Voucher (HCV) programs across the City of Bethlehem. Some information in this section has been supplemented with the most up-to-date and recent data provided directly by the BHA to the City. There are 513 HCV holders in Bethlehem, with 846 households currently on the BHA's waiting list for vouchers. Current HCV holders in the City have the following household characteristics:

- Income: 301 Extremely Low-Income (0-30% AMI); 63 Very Low-Income (30-50% AMI); and 25 Low-Income (50-80% AMI).
- Types of Families: Families with Children (123); Elderly Families (126); and Families with Disabilities (235).
- Race/Ethnicity: White (328); Black or African American (59); Asian (1); American Indian or Alaska Native (3); Native Hawaiian or Other Pacific Islander (2); and Hispanic or Latino of any race (269).

In addition to HCVs, the BHA is also responsible for overseeing the City's public housing stock. Currently, there are five Asset Management Projects (AMPs) comprising a total of 1,451 public housing units in Bethlehem. These public housing units include:

- AMP 1: Pembroke (169 units); Fairmont (120 units); and Pfeile (50 units restricted to seniors).
- AMP 2: Marvine (389 units).
- AMP 3: Lynfield Homes (200 units); and Parkridge (100 units).
- AMP 4: Litzenberger (101 units restricted to seniors); Bodder (65 units restricted to seniors); Bartholomew (6 units restricted to seniors); and Monocacy Tower (14 units restricted to seniors).
- AMP 5: Bayard Homes (20 units).

In 2025, The City of Bethlehem, in partnership with the Bethlehem Housing Authority (BHA), was awarded a HUD Choice Neighborhoods (CN) Planning Grant. The CN program supports the revitalization of distressed public housing and will be used to revitalize Pembroke Village.

Totals in Use

	Certificate	Mod-Rehab	Public Housing	Program Type						
				Vouchers			Special Purpose Voucher			
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *	
# of units vouchers in use	0	0	1,425	495	0	481	13	0	0	0

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Certificate	Mod-Rehab	Public Housing	Program Type						
				Vouchers			Special Purpose Voucher			
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program		
Average Annual Income	0	0	13,464	12,989	0	13,029	11,297	0	0	0
Average length of stay	0	0	8	6	0	6	0	0	0	0
Average Household size	0	0	2	2	0	2	1	0	0	0
# Homeless at admission	0	0	0	1	0	1	0	0	0	0
# of Elderly Program Participants (>62)	0	0	382	93	0	91	2	0	0	0
# of Disabled Families	0	0	460	201	0	194	7	0	0	0

	Certificate	Mod-Rehab	Public Housing	Program Type				
				Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	
# of Families requesting accessibility features	0	0	1,425	495	0	481	13	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type				
				Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	
White	0	0	1,308	397	0	388	8	0
Black/African American	0	0	111	95	0	90	5	0
Asian	0	0	6	2	0	2	0	0
American Indian/Alaska Native	0	0	0	1	0	1	0	0
Pacific Islander	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type								
				Vouchers			Total	Project - based	Tenant - based	Special Purpose Voucher		
				Veterans Affairs Supportive Housing	Family Unification Program	Disabled *				Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	1,012	276	0	270	5	0	0	0	0	0
Not Hispanic	0	0	413	219	0	211	8	0	0	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

As shown in the above tables, the average annual income of all voucher holders is approximately \$12,989. According to data provided by the Bethlehem Housing Authority (BHA), the majority of the City's voucher holders (approximately 77 percent) are extremely low-income, earning between 0 to 30 percent of the area median income (AMI). For public housing residents, the average annual income is \$13,464. According to 2016-2020 ACS 5-Year estimates, the City's median income is \$56,034. This indicates a limited ability for public housing residents and voucher holders to cover the cost of other basic needs, such as food, transportation, healthcare, and additional personal needs.

Further, according to data provided by the BHA, nearly 46 percent of housing choice voucher (HCV) holder households have members with disabilities. There are currently 846 households on the BHA's waitlist for HCVs. Persons with disabilities who are on the waitlist require case management and comprehensive supportive services to avoid further housing complications, such as eviction and homelessness. Providing supportive services to public housing tenants and applicants on the waiting list for accessible units contributes to a healthy community.

According to BHA policy:

The PHA must ensure that persons with disabilities have full access to the PHA's programs and services. This responsibility begins with the first inquiry of an interested family and continues through every programmatic area of the public housing program [24 CFR 8].

The PHA must provide a notice to each tenant that the tenant may, at any time during the tenancy, request reasonable accommodation of a handicap of a household member, including reasonable accommodation so that the tenant can meet lease requirements or other requirements of tenancy [24 CFR 966.7(b)].

PHA Policy

"The PHA will ask all applicants and resident families if they require any type of accommodations, in writing, on the intake application, reexamination documents, and notices of adverse action by the PHA, by including the following language:

"If you or anyone in your family is a person with disabilities, and you require a specific accommodation in order to fully utilize our programs and services, please contact the housing authority."

A specific position and phone number will be provided as the contact person for requests for accommodation for persons with disabilities.

The PHA will display posters and other housing information and signage in locations throughout the PHA's office in such a manner as to be easily readable from a wheelchair" (Admissions and Continued Occupancy (ACOP) for the Public Housing Program, Bethlehem Housing Authority).

Preliminary recommendations from the City of Bethlehem's Pembroke Choice Neighborhood Study for the Pembroke public housing building calls for the inclusion of one-level housing units for elderly and accessibility-challenged residents.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The City's Pembroke Village public housing site, located in one of two of Bethlehem's racially or ethnically concentrated areas of poverty (R/ECAP) is in dire need of reinvestment and revitalization. In January of 2025, the BHA and the City of Bethlehem invited developers to respond to a Request for Qualifications (RFQ) for the Pembroke Choice Neighborhood Plan. Funded through HUD's Choice Neighborhoods Planning Grant, this project will result in a mixed-income transformation plan for the Pembroke Village site and the surrounding Pembroke Choice Neighborhood.

As previously discussed, the City's public housing residents have an average income of \$13,464, while housing choice voucher (HCV) holders have an average income of \$12,989. According to 2016-2020 ACS 5-Year estimates, the City's median income is \$56,034. The contrast between the average income of BHA residents/voucher holders and the median income of the City's residents shows a need for supportive services. Even with housing assistance provided by the BHA, BHA beneficiaries face a limited ability to cover the cost of other basic needs such as food, transportation, healthcare, childcare, and additional personal needs.

Currently, the BHA offers many additional programs to bolster the incomes and self-sufficiency of its residents and voucher holders. These include:

- Earned Income Tax Credit (EITC): EITC offers tax reductions to qualifying persons who work but who do not have high incomes.
- Family Self-Sufficiency Program (FSS): The FSS Program is designed to assist public housing residents and HCV holders to achieve economic dependence. This five-year program assists with goals, needs, and barriers to self-sufficiency through individual training and services plans. Participating households are eligible for an escrow savings account that increases concurrently with earned income. While this results in a rent cost increase, upon successful completion of the five-year contract, households are entitled to the money accumulated in their account.
- Recreation: The BHA has a Recreation Department that sponsors activities for residents to improve life quality for both children and adults.
- Community Service: Under the Quality Work and Housing Responsibility Act of 1998, BHA public housing residents are required to participate in community service activities for a minimum of eight hours each month. Residents who are not required to participate in community service include seniors, persons with disabilities, children under the age of 18, caregivers, those who are employed at least 30 hours per week, and FSS Program participants who are contributing eight hours per month to their FSS Program participation.

How do these needs compare to the housing needs of the population at large

Public housing residents and voucher holders typically earn extremely low incomes but are relatively secure in their housing situation. The BHA's waiting list for its HCV program is lengthy, with a total of 846 households on the waiting list. Extremely low-income residents of the City of Bethlehem who are not currently receiving housing assistance through the BHA have many of the same financial needs as those who do receive housing assistance, with the addition of needing to find affordable and properly maintained housing.

Discussion

n/a

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The City of Bethlehem coordinates and collaborates with various social agencies, homeless service organizations, low-income housing advocates, and affordable housing providers to address the underserved needs of area residents, particular those who are homeless. Through the City's continued participation in regional housing forums, most notably the Lehigh Valley Regional Homeless Advisory Board (LV RHAB), Bethlehem works with service providers to address emergency shelter and transitional housing needs. The City is represented on the LV RHAB by its Housing and Community Development Planner.

In order to effectively meet the demand for homeless services, Homeless Assistance Program (HAP) funds are allocated to all 67 Pennsylvania counties. HAP funds help ensure: 1) homelessness can be avoided through a variety of prevention services assisting clients to maintain affordable housing; 2) people who are homeless can find refuge and care; and 3) homeless and near homeless clients are assisted in moving toward self-sufficiency. City residents in Northampton County can access services through the Northampton County Department of Human Services in Bethlehem Township, while the residents within Lehigh County receive services through the Lehigh County Department of Aging and Adult Services in Bethlehem Township. In general, the City refers all applications for assistance, relative to homelessness, to the Eastern Pennsylvania Continuum of Care (CoC).

As with many jurisdictions across the State of Pennsylvania and the nation, homelessness in the City of Bethlehem is on the rise. The Eastern Pennsylvania CoC coordinates an annual Point-in-Time (PIT) Count which provides County-wide jurisdictional estimates of how many individuals and households are homeless. Data is further broken down by sheltered and unsheltered homelessness. According to the PIT Count, between 2022 and 2024, Northampton County saw a nearly 31 percent decrease in homelessness, while Lehigh County experienced an almost six percent decrease. However, in Lehigh County, while unsheltered homelessness decreased by approximately 36 percent, unsheltered homelessness increased significantly by approximately 227 percent.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	0	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	0	0	0	0	0	0
Chronically Homeless Individuals	0	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Child	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments:

1

The Eastern Pennsylvania Continuum of Care's (CoC's) Annual Point-in-Time (PIT) Count is conducted across the entire Eastern Pennsylvania region. Detailed summary data is available by County, including both Northampton and Lehigh Counties. While data on the number of people becoming and exiting homelessness each year and the number of days that people experience homelessness, detailed data on homeless sub-populations exists.

According to the 2024 PIT Count for Northampton County and Lehigh County:

Chronically Homeless Individuals and Families:

In Northampton County, there were 35 chronically homeless individuals and one chronically homeless family. Nearly 69 percent of these individuals were living in emergency shelters and approximately 31 percent were unsheltered. Between 2022 and 2024, there was an

approximately 22 percent increase in chronically homeless individuals in Northampton County.

In Lehigh County, there were 27 chronically homeless individuals and four chronically homeless families. Approximately 48 percent of these individuals were living in emergency shelters and nearly 52 percent were unsheltered. Between 2022 and 2024, there was an approximately 29 percent increase in chronically homeless individuals in Lehigh County.

Indicate if the homeless population
is: Has No Rural Homeless

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Families with Children:

In Northampton County, there were 32 families with children, with 67 individual children (62 percent of individuals) under the age of 18. Of these 32 households, approximately 31 percent were living in emergency housing, nearly 69 percent in transitional housing, and none were unsheltered. Less than four percent of individuals in these families were young adults aged 18 to 24 years old. Between 2022 and 2024, there was an approximately 57 percent decrease in homeless families with children in Northampton County.

In Lehigh County, there were 45 families with children, with 99 individual children (66 percent of individuals) under the age of 18. Of these 45 households, approximately 84 percent were living in emergency housing, approximately 16 percent in transitional housing, and none were unsheltered. Eight percent of individuals in these families were young adults aged 18 to 24 years old. Between 2022 and 2024, there was an approximately 31 percent decrease in homeless families with children in Lehigh County.

Veterans and their Families:

In Northampton County, there were 20 homeless veteran households. 40 percent of these households were living in emergency shelter, 60 percent in transitional housing, and none were unsheltered. Between 2022 and 2024, there was a significant decrease, approximately 46 percent, of homeless veterans in Northampton County.

In Lehigh County, there were five homeless veteran households, representing less than three percent of all homeless households in the County.

Two of these households were living in emergency shelter and two were unsheltered. Between 2022 and 2024, there was a significant decrease, approximately 81 percent, of homeless veterans in Lehigh County.

Unaccompanied Youth:

Unaccompanied youth are defined as youth who are homeless and are age 24 or under. In Northampton County, there were 15 unaccompanied youth individuals, all of which were between the ages of 18 and 24. Of these 15 unaccompanied youth, almost 67 percent were living in emergency housing, approximately seven percent were living in transitional housing, and almost 27 percent were unsheltered. Between 2022 and 2024, there was an approximately 48 percent decrease of unaccompanied youth in Northampton County.

Unaccompanied youth are defined as youth who are homeless and are age 24 or under. In Lehigh County, there were 24 unaccompanied youth individuals, of which approximately 33 percent were under the age of 18. Of these 24 unaccompanied youths, approximately 42 percent were living in emergency housing, 42 percent were living in transitional housing, and almost 17 percent were unsheltered. Between 2022 and 2024, there was a significant increase of almost 243 percent unaccompanied youth in Lehigh County.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	0	0
Black or African American	0	0
Asian	0	0
American Indian or Alaska Native	0	0
Pacific Islander	0	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	0	0
Not Hispanic	0	0

Data Source

Comments:

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Based on the 2024 Point-in-Time (PIT) Count for Northampton and Lehigh Counties, combined, the estimated number and type of families in need of housing assistance are as follows: Families with Children: There are 77 families with children experiencing homelessness, all of whom are sheltered. Approximately 62 percent are in emergency housing and 38 percent are in transitional housing; Families of Veterans: There are 25 veterans experiencing homelessness, with 88 percent sheltered and 12 percent unsheltered.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Data on the nature and extent of homelessness by racial and ethnic group at the County-level was unavailable. Data below is for the Eastern Pennsylvania Continuum of Care (CoC), of which the City of Bethlehem is located: 0.66 percent American Indian, Alaska Native, or Indigenous; 0.48 percent Asian or Asian American; 20.82 percent Black, African American, or African; 8.66 percent Hispanic or Latino Only; 0.39 percent Middle Eastern or North African; 0.30 percent Native Hawaiian or Other Pacific Islander; 55.96 percent White; 7.95 percent Hispanic and One or More Race; 4.73 percent Non-Hispanic and Multiple Race

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Approximately 38 percent of the Northampton and Lehigh Counties' homeless population are unsheltered. Unsheltered individuals reside in places not meant for human habitation and rely on outdoor spaces, such as streets or parks, abandoned buildings, or their vehicles to sleep in. These

individuals often face significant challenges, including exposure to the natural elements, lack of access to basic amenities, and increased vulnerability to health issues and safety concerns.

Simultaneously, approximately 62 percent of the Northampton and Lehigh Counties homeless population are sheltered, residing in either emergency shelters or transitional housing. While these individuals have access to basic amenities and a safer environment compared to those who are unsheltered, they still face instability and uncertainty about their long-term housing situation due to the temporary nature of their living situation.

Discussion:

As with many other jurisdictions across the country, homelessness is an ongoing issue in the City of Bethlehem which requires many resources to effectively address. In September 2023, the City of Bethlehem prepared a Strategic Plan to Address Homelessness. In preparation for the Strategic Plan to Address Homelessness, the City surveyed homeless individuals. 45 percent of respondents stated having chosen not to stay at a shelter at some point due to feeling unsafe or unwelcome, having no option to stay with their partner/spouse or family, and no accommodations for pets. Further, 42 percent of respondents said that the lack of affordability is keeping them from finding housing. The Plan provided five recommendations, based on community engagement and data-driven analysis, including the following: Provide year-round, low-barrier emergency sheltering as part of a comprehensive housing services approach; Recommendation 2: Support the development of a regional system-oriented approach to address homelessness; Recommendation 3: Develop permanent supportive and affordable housing solutions; Recommendation 4: Develop public/private partnerships to support regional initiatives on homelessness; Recommendation 5: Strengthen partnerships with the counties to support a regional approach to addressing homelessness.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

HUD identifies certain groups of people who are not homeless but who often face difficulty finding decent, affordable, and accessible housing, due to their special characteristics and needs. These special needs households include, but are not limited to:

- Elderly (aged 62 or older)
- Frail elderly (elderly persons who require assistance with three or more activities or daily living such as bathing, walking, and performing light housework)
- Persons with mental, physical, or developmental disabilities
- Large family households
- Female-headed households
- Persons with alcohol or other drug addiction
- Persons with HIV/AIDS and their families
- Victims of domestic violence, dating violence, sexual assault, and stalking

Describe the characteristics of special needs populations in your community:

Elderly Households

HUD defines elderly persons as persons aged 62 or older. According to 2016-2020 ACS estimates, 12 percent of the population are elderly. Seniors face unique housing challenges due to three main factors: limited or fixed income, healthcare costs, and disabilities. Many seniors are retired and live on fixed incomes, making it difficult to afford major home repairs or significant rent increases. Consequently, seniors have special needs for affordable housing and supportive services.

Persons with Disabilities

Individuals with physical, mental, or developmental disabilities may face barriers to employment, restricted mobility, or difficulties in self-care. These challenges create special housing needs related to limited earning capacity, a lack of accessible and affordable housing, and higher healthcare costs. Developmentally disabled residents may require institutional settings, but many can live and work independently in conventional housing. More disabled individuals might need supervised group living environments, while the most severely disabled require medical attention and physical therapy. These conditions highlight the special housing needs of persons with disabilities.

According to 2016-2020 ACS 5-Year estimates, 14.2 percent (10,564 persons) of the population living in Bethlehem has one or more disability. The most prevalent disability affecting the population is ambulatory difficulty (7.1 percent), followed by cognitive difficulty (6.7 percent), independent living difficulty (6.1 percent), hearing difficulty (3.1 percent), self-care difficulty (2.7 percent), and vision difficulty (2.6 percent). The majority of persons with disabilities in the City are seniors aged 75 years and over, representing 44 percent of the population with disabilities.

Large Family Households

Large households, defined as those with five or more members, often face special housing needs due to a limited supply of adequately sized, affordable housing units. Lower-income large renter households typically encounter issues such as cost burden, overcrowding, and deteriorated housing conditions. According to 2016-2020 CHAS data, there are 1,595 large family households in the City, representing 5.4 percent of all households. Approximately 51 percent of these large family households are low- to median-income, earning 80 percent or less of the area median income (AMI).

Female-Headed Households

Single-parent households, particularly those headed by females, often require special assistance due to their greater need for affordable housing and access to daycare, healthcare, and other supportive services. With lower household incomes, female-headed households have limited housing options and restricted access to necessary supportive services.

What are the housing and supportive service needs of these populations and how are these needs determined?

Elderly Households

Meeting the housing needs of elderly residents can be particularly challenging due to their fixed incomes and particular care requirements, which often stem from physical disabilities, health care costs, and other limitations. In addition to affordable housing, seniors need services that help maintain their independence, such as protective services for health and safety, in-home support for daily activities, conservators for personal and financial care, public administration for estate management, and networks of care providing a variety of daily assistance.

During stakeholder interviews and roundtables, stakeholders expressed a need to support housing initiatives for medically complex individuals who require long-term care and cannot use vouchers. When asked about the most critical housing needs in the community, approximately 20 percent of Community Needs Survey respondents chose senior housing. In an open-ended response, one resident noted being a senior and spending more than their Social Security Income check on rental housing and indicated a lack of affordable rental housing units in the City.

Persons with Disabilities

Individuals and households with disabilities face unique housing challenges due to healthcare costs, limited incomes, and a lack of accessible and affordable housing. Disabilities, as defined by state and federal agencies, include any long-term physical, mental, or emotional condition that impedes independent living and affects major life activities. Suitable housing options for people with developmental disabilities include rent-subsidized homes, licensed and unlicensed single-family homes, inclusionary housing, Section 8 housing, and HUD housing.

When asked about the most critical housing needs in the community, approximately 14 percent of Community Needs Survey respondents chose housing for those with disabilities. Even more so, when asked about factors contributing to housing discrimination in the community, approximately 30 percent of respondents chose disabilities.

Large Family Households

Large households, defined as those with five or more members, require larger housing units with four or

more bedrooms to accommodate their needs. According to 2016-2020 ACS 5-Year estimates, housing units with four or more bedrooms currently occupied include 3,895 owner units and 1,206 renter units, for a total of 5,101 large units. With 1,595 large family households in the City, there are technically enough units to satisfy the current need. However, approximately 51 percent of the City's large family households earn low- to moderate-incomes and currently available large units may be unaffordable relative to their income.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

According to the Bureau of Epidemiology at the Pennsylvania Department of Health's 2023 Annual HIV Surveillance Summary Report, there were 126 total HIV diagnoses in Lehigh County and 72 in Northampton County from 2019 through 2023, with 1,812 total individuals living with HIV across both counties.

Further, according to the Eastern Pennsylvania Continuum of Care's (CoC's) 2024 Point-in-Time (PIT) Count, there are four homeless persons with HIV/AIDS in Lehigh County, three of whom are residing in emergency shelter and one of whom is unsheltered.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

n/a

Discussion:

n/a

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

Public facilities provide a wide range of services, with effects of improvement positively benefiting the lives of low-income and special needs residents. During stakeholder interviews and roundtable discussions, stakeholders expressed a need for a focus on the Bethlehem Area Public Library which is used as a location for homeless shelter and services. Attendees of the City's Community Meetings discussed a concern for worsening storms resulting in flooding to the City's low-lying areas, particularly in public parks.

When asked about the most critical community facilities needed in the community, Community Needs Survey respondents answered:

- Parks and Recreational Facilities (56.78 percent)
- Community Centers (50.75 percent)
- Youth Centers (31.16 percent)
- Senior Centers (27.64 percent)
- Childcare Centers (26.13 percent)
- Libraries (16.08 percent)
- Fire Station and Equipment (9.05 percent)
- Healthcare Facilities (7.04 percent)

How were these needs determined?

Needs for public facilities were determined through the community engagement process. Stakeholder interviews and roundtable discussions, public meetings, and a Community Needs Survey informed the City about issues in the community and what residents believe would be most beneficial. The Community Needs Survey received a total of 199 responses and was available in both English and Spanish.

Describe the jurisdiction's need for Public Improvements:

Public improvements also encompass a wide range of services that positively benefit the quality of life for residents, including low-income and special needs residents. During stakeholder interviews and roundtable discussions, stakeholders identified a need to address the stress of new housing on water and wastewater systems, along with roads and infrastructure rehabilitation, including park improvements and trail maintenance.

Community members who attended community meetings further expressed a need to address sidewalk accessibility issues through ADA improvements and a desire for increased open space/green areas to maintain property value and improve façade. In addition, community members discussed that worsening storms are resulting in flooding for the City's low-lying areas.

Through the Community Needs Survey, residents were asked about the most critical infrastructure or

quality of life improvements needed in the community. They answered as follows:

- Street/Alley/Sidewalk Improvements (62.31 percent)
- Tree Planting and Urban Greenery (39.20 percent)
- Sidewalk Street Lighting (29.65 percent)
- Broadband Internet Connectivity (23.12 percent)
- Safe Routes to School (23.12 percent)
- Blight and Trash Removal (17.09 percent)
- ADA Accessibility Improvements to Public Roads and Facilities (16.08 percent)
- Water/Sewage Improvements (14.57 percent)
- Graffiti Removal (10.55 percent)
- Access to Free Electric Vehicle Charging Stations/Increased Stations (10.05 percent)

How were these needs determined?

Needs for public improvements were determined through the community engagement process. Stakeholder interviews and roundtable discussions, public meetings, and a Community Needs Survey informed the City about issues in the community and what residents believe would be most beneficial. The Community Needs Survey received a total of 199 responses and was available in both English and Spanish.

Describe the jurisdiction's need for Public Services:

Public services are fundamental to providing the support needed to improve the quality of life and reduce affordability strains for low-income and special needs residents of a community. Community engagement for this ConPlan highlighted a need for services geared towards things like affordable housing and services for youth, seniors, homeless persons. When asked about service improvements in the City, Community Needs Survey respondents answered as follows:

- Affordable Housing (62.31 percent)
- Services for the Homeless (42.71 percent)
- Housing (30.15 percent)
- Youth Issues (23.62 percent)
- Senior Issues (20.10 percent)
- HIV/AIDS (1.01 percent)

Residents in community meetings also expressed concern for a lack of mental health support. Stakeholders further corroborated a need for mental health support, along with adult education seminars, employment opportunities and workforce training to enhance economic mobility, housing rehabilitation, affordable housing options, and general public services to support extremely low-income households and those who are at-risk of homelessness.

How were these needs determined?

Needs for public services were determined through the community engagement process. Stakeholder interviews and roundtable discussions, public meetings, and a Community Needs Survey informed the City about issues in the community and what residents believe would be most beneficial. The Community Needs Survey received a total of 199 responses and was available in both English and Spanish.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The City of Bethlehem is a healthy and vibrant urban center that continues to reinvent itself with the changing times. As of the 2016-2020 American Community Survey (ACS) 5-Year Estimate, the population in the City of Bethlehem was 75,571. The racial makeup of the City is approximately 59,946 (73 percent) White, 6,953 (nine percent) Black/African American, 2,323 (three percent) Asian, 145 (0.2 percent) American Indian/Alaska Native and 22,621 (30 percent) Hispanic. An additional 5,702 (eight percent) are identified as other or two or more races.

The housing market in the City of Bethlehem is marked with increasing demand and limited supply, of which the current supply consists of an aging housing stock. According to the 2016-2020 ACS 5-Year estimates, there are approximately 31,287 housing units in the City. Of those units, approximately 94 percent are occupied, and six percent are vacant. The vacancy rate is slightly down since 2011 from eight percent. The housing stock in Bethlehem is older compared to much of the surrounding area. 33 percent of the housing units were constructed prior to 1940, 47 percent of the housing stock was constructed between 1940 and 1979, and the remaining 20 percent was constructed after 1980. Only six percent was constructed in the last 25 years, thus highlighting the historic nature of the majority of the housing units in Bethlehem.

As a result of the older housing stock, maintaining units in good repair is an ongoing effort for the City of Bethlehem in order to serve the community's needs. Approximately 49 percent of the units are renter-occupied, and 51 percent are owner-occupied. The City's homeownership rates are lower than those in the county.

The urban and historic nature of Bethlehem lends itself to a greater number of attached units compared to its suburban counterparts. In 2020, the number of one unit detached units made up only 36 percent of the total housing stock. 28 percent of units were single unit attached units, and the remaining units ranged from two units to 20 units or more.

Bethlehem's population has a transient component. Approximately seven percent of households moved into their current home in 2019 or later according to the 2016-2020 ACS 5-Year estimate. Additionally, 69 percent of households moved in between 2000 to 2015. The number of households that have been lifelong residents of Bethlehem is significantly smaller with only 15 percent of the population moving in prior to 1989.

According to 2016-2020 ACS 5-Year estimates, 16 percent of individuals are living at or below poverty level. ACS data also reports that approximately 14 percent of households earn less than \$24,999 while the next 22 percent of households earn between \$25,000 and \$49,999, followed by 19 percent earning between \$50,000 and \$74,999. Approximately 33 percent of the population earns between \$75,000 and \$149,999, and 12 percent of households earn greater than \$150,000.

According to the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data, approximately 17.7% of households in owner-occupied housing units pay greater than 30% of household income on monthly home ownership costs also known as SMOCAPI “Selected Monthly Owner Costs as a percentage of Household Income.” Renters are suffering a greater burden with nearly 47.2% of renter households paying more than 30% of household income on Gross Rent or GRAPI, “Gross Rent As a Percentage of Household Income”.

The following topics are covered in the Market Analysis section: Housing Units, Cost, and Condition; Public and Assisted Housing; Homeless Facilities and Services, Special Needs Facilities and Services, Barriers to Affordable Housing, Non-Housing Community Development Assets, Needs and Market Analysis Discussion, Broadband Needs, and Hazard Mitigation.

Please note: The City of Bethlehem’s current reality of housing and economic conditions, reflected through the City’s 2023 Opening Doors housing study, may contradict that which is demonstrated through the above data sets. This discrepancy is due to lags in federal data sets exacerbated by the City’s rapidly shifting housing and economic conditions post-COVID.

Not notwithstanding the following: The City’s 2023 Opening Doors housing study found that the City has a 2% rental vacancy rate, signaling a crisis. The City needs 719 new rental units to rebalance the market to a healthier 7% vacancy rate.

As part of the housing study, a market value analysis (MVA) was conducted, which identifies areas that are the highest-demand markets as well as the areas of greatest distress, and the various market types in between. MVA results offer insight into the variation in market strength and weakness. The MVA found that while the City’s stressed markets (“E” and “F”) are currently the most affordable, they are also at the highest risk for displacement due to their low median sales price and high concentration of investor purchases. A displacement risk ratio (DRR) was calculated for each block group, and it was found that the citywide DRR increased from 2.58 in 2015-2016 to 3.54 in 2021-2022, with greatest concern for displacement at a ratio above 1.5 and a ratio above 3.0 considered “high pressure.”

The areas of highest risk for displacement coincide with those areas considered stressed markets, which are also home to the most affordable housing and where the City’s remaining naturally occurring affordable housing is concentrated. This signals that Bethlehem’s transient population will continue to increase, with its number of lifelong residents, especially those of lower AMIs, significantly decreasing and replaced by new residents of higher economic means. According to household forecasts produced by ESRI Business Analyst, Bethlehem’s population is anticipated to change very little over the next five years despite high demand for housing in the City and Lehigh Valley. Because of the high housing demand (as indicated by low vacancy and a surge in home prices), forecasts predict a significant shift in income among Bethlehem’s residents while the population remains mostly static. Over the next several years, forecast show Bethlehem losing 1,450 households making less than \$100,000 a year, while gaining 1,700 households earning more than \$100,000.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

The housing stock in the City of Bethlehem is significantly older compared to its suburban counterparts, and the housing stock is made up of a greater number of single-family detached and attached homes compared to multi-family units. A considerable number of resources are necessary to address the City's mismatch of households living in larger homes who want to downsize and those who are living in small units but require larger units as well as ensuring units are preserved to maintain quality and safety standards.

Renter-occupied units in the City tend to be smaller compared to the owner-occupied units, offering fewer bedrooms and less space for tenants. For example, the number of renter-occupied one-bedroom units makes up 33 percent of the inventory, while the owner-occupied counterpart only comprise one percent of inventory. The trend continues for two- and three- or more bedroom units. Nearly 86 percent of the City's owner-occupied units have three or more bedrooms, while only 29 percent of the renter-occupied units have three or more bedrooms. Addressing the need for smaller rental units and smaller owner-occupied units for a changing household make-up is an ongoing issue and concern for the City of Bethlehem.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	11,235	36%
1-unit, attached structure	8,675	28%
2-4 units	4,245	14%
5-19 units	4,225	14%
20 or more units	2,870	9%
Mobile Home, boat, RV, van, etc	35	0%
Total	31,285	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2016-2020 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	55	0%	565	4%
1 bedroom	215	1%	4,765	33%
2 bedrooms	1,810	12%	5,025	35%
3 or more bedrooms	12,775	86%	4,140	29%
Total	14,855	99%	14,495	101%

Table 28 – Unit Size by Tenure

Data Source: 2016-2020 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The Bethlehem Housing Authority (BHA) owns and manages 1,451 conventional public housing units, primarily within five Asset Management Projects (AMPs) in 11 separate developments located throughout the City of Bethlehem. 429 units (30 percent) are designated as senior housing. The overall annual turnover rate is low, approximately 15 percent of the units, and the occupancy rates range from 98 to 99 percent.

The BHA also administers 513 Housing Choice Vouchers (HCVs), also known as Section 8, to low-income individuals and families to subsidize rent. 301 vouchers (59 percent) are for extremely low-income (0-30 percent AMI), 63 (12 percent) for very low-income (30-50 percent), and the remaining vouchers are for low-income households (50-80 percent).

Housing units are aimed at individuals earning primarily 30 percent or less than MFI in the City. These individuals are concentrated primarily in the Southside Neighborhoods of the City and in certain areas of the north and west side. Low-income families are predominately White and Hispanic.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Currently there are no units set to expire this year under the Section 8 plan. According to the City's 2023 Opening Doors housing study, by 2030, 196 of Bethlehem's low-income tax credit (LIHTC)-funded units will be at least 30 years old and may be at risk for converting to market-rate if they do not have additional affordability requirements.

Does the availability of housing units meet the needs of the population?

Approximately 46 percent of households in the City earn less than City's median household income of \$56,034 according to the 2016-2020 ACS 5-Year estimate. Affordable monthly rent amounts for a one-to-four-person household making less than 50 percent of the AMI ranges from \$561-861 for a one-person household to \$780-1,229 for a four person household. Of the rental housing units in the City, 58 percent are \$999 or less per month. Meanwhile, the affordable housing purchase price for one-to-four-person households making less than 50 percent of the AMI ranges from \$47,162 to \$93,231 for a one-person household to \$82,382-134,924 for a four-person household. The median housing value is \$175,600. With regard to vacancy rates, there is currently a six percent vacancy rate in the City of Bethlehem, which is considered a healthy range for residential rental properties, though there may be a mismatch between income and availability for lower income households.

Not notwithstanding the following: The City's 2023 Opening Doors housing study indicated that Bethlehem's housing market has mirrored national and regional trends, seeing significant price hikes due to the COVID-19 pandemic. Bethlehem's housing market has historically been affordable, meaning a household earning median income could afford to buy a home and a moderate-income could rent an apartment without being cost burdened. Post-pandemic, this is no longer the case with Bethlehem's median home sale price having rose from \$182,000 in May 2019 to \$302,000 in May 2023. Similarly, the

typical rent in May 2023 was \$1,910, an increase of \$556 from May 2019.

The City's 2% rental vacancy rate signals the significantly increased demand and severely low supply, which has driving housing costs up, and made access to affordable housing virtually non-existent for households making below 120% AMI. In fact, there are no block groups within the City categorized as affordable for households at 80% AMI or below and only small portions of the City affordable to households at 100% AMI. Over the next five years, the City needs at least 1,052 rental units to meet the demand and reach a healthy 7% vacancy rate. If demand is not met, Bethlehem's population will skew significantly wealthier by 2028, ultimately seeing more displacement and the loss of long-term residents and very low-income households.

Describe the need for specific types of housing:

Given population trends both regionally and in the City, there are key cohorts of the population that should be targeted for new housing opportunities. They include low/moderate income workers, and students/young adults. Income is not keeping up with the rising cost of housing. Households making 50 percent and less of the AMI have limited affordable housing options. Given Bethlehem's tourism and service industry, there is a need for housing that accommodates lower wage workers and their families. The same applies for students and young adults whose housing needs can be addressed in partnership with the major educational institutions present in the City, including Moravian University, Northampton Community College, and Lehigh University. Due to the age of the housing stock, there is also a need for housing rehabilitation support in order to preserve and improve existing housing to accommodate older adults and people with disabilities.

Discussion

dwellings with fewer rooms and bedrooms, which poses challenges for larger households. The disparity between owner-occupied and renter-occupied units is significant, with owner-occupied units predominantly offering three or more bedrooms, while renter-occupied units are mostly one or two-bedroom units. Many of the City's aging population reside in these larger owner-occupied homes and are looking to downsize but with a 2% rental vacancy rate there is not enough supply to meet demand. Many households seeking to purchase their first home are either one-person households or do not have children and are seeking fewer than three bedrooms, which is currently lacking in supply within the market. This highlights an ongoing need for more 1- and 2-bedroom rental units and homeownership options , as the current inventory does not sufficiently meet this demand.

The Bethlehem Housing Authority (BHA) plays a crucial role in providing affordable housing through its management of 1,451 conventional public housing units and administration of 513 Housing Choice Vouchers (HCVs). Despite these efforts, there remains a mismatch between housing prices and income levels, with many households earning less than the city's median income struggling to find affordable housing. The City's tourism and service industry further underscore the need for high-density rental housing for lower-wage workers, as well as housing options for students and young adults.

Please note: The City of Bethlehem's current reality of housing and economic conditions, reflected through the City's 2023 Opening Doors housing study, may contradict that which is demonstrated

through the above data sets. This discrepancy is due to lags in federal data sets exacerbated by the City's rapidly shifting housing and economic conditions post-COVID.

Notwithstanding the following: The City's 2023 Opening Doors housing study found that there is demand for one- and two-bedroom rental units, as well as homeownership opportunities for smaller, less traditional, household makeups. This includes housing for very low-income households earning below 50% AMI, low-income households earning 50%-80% AMI, and workforce housing for households earning 80%-120% AMI.

The City continues to see an influx of warehouses and jobs within the service industry. Of the top 20 occupations in the region, 16 could not afford a one-bedroom unit in the City. Even when we assume a dual-income household, only four of the top 20 occupations could afford a median-priced home in the City. More alarming, many of the city's workers – cashiers, home health aides, retail and janitorial workers – cannot afford to rent a one-bedroom apartment, even with two earners in the household.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

24 percent of owners and 47 percent of renters spend more than 50 percent of their monthly income on housing costs.

As stated in MA-05, the number of households living at or below poverty level is significant in the City of Bethlehem. Approximately 16 percent of individuals live below the poverty level. According to 2016-2020 ACS 5-Year estimates, approximately 46 percent of households in the City earn less than City's median household income of \$56,034. Affordable monthly rent amounts for a one-to-four-person household making less than 50 percent of the AMI ranges from \$561-861 for a one-person household to \$780-1,229 for a four-person household. Of the rental housing units in the City, 58 percent of them are \$999 or less a month. Affordable housing purchase price for one-to-four-person household making less than 50 percent of the AMI ranges from \$47,162-\$93,231 for a one-person household to \$82,382-\$134,924 for a four-person household. The median housing value is \$175,600.

According to the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data, approximately 17 percent of households in owner-occupied housing units pay greater than 30 percent of household income on monthly home ownership costs also known as SMOCAPI "Selected Monthly Owner Costs as a Percentage of Household Income". Renters are suffering a greater burden with nearly 47 percent of renter households paying more than 30 percent of household income on Gross Rent or GRPI, "Gross Rent as a Percentage of Household Income."

Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	170,500	175,600	3%
Median Contract Rent	810	917	13%

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	2,800	19.3%
\$500-999	5,810	40.1%
\$1,000-1,499	4,840	33.4%
\$1,500-1,999	785	5.4%
\$2,000 or more	260	1.8%
Total	14,495	100.0%

Table 30 - Rent Paid

Data Source: 2016-2020 ACS

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	1,870	No Data
50% HAMFI	3,750	1,165
80% HAMFI	9,300	4,015
100% HAMFI	No Data	5,620
Total	14,920	10,800

Table 31 – Housing Affordability

Data Source: 2016-2020 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	967	1,102	1,396	1,789	1,875
High HOME Rent	737	887	1,126	1,291	1,421
Low HOME Rent	686	735	882	1,019	1,137

Table 32 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

There is not sufficient housing at all income levels. Currently, there is a waiting list of 846 families on the Housing Choice Voucher list in the City of Bethlehem indicating strong demand for affordable units that the market does not supply.

According to HUD, a rental unit is considered affordable if gross rent, including utilities, is no more than 30 percent of the household income. There are approximately 1,870 rental units available for households that can afford approximately 30 percent of HAMFI. To pay the median contract rent in Bethlehem, a household would need to earn approximately \$52,680 per year and pay 30 percent of household income on rent.

For homeownership, with a median value in 2020 of \$175,600, it is estimated that spending 30 percent of income on principal interest, taxes, etc. must make at least \$43,040 a year to afford a home in Bethlehem, excluding the costs of downpayment and closing costs.

How is affordability of housing likely to change considering changes to home values and/or rents?

Median Home Values only went up three percent from 2011 to 2020, while median contract rents increased by five percent. Having a large student population leads to rents increasing more rapidly as there is more demand for rentals in Bethlehem than there is for owner-occupied homes.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

In 2024, the HOME/Fair Market Rent for a one bedroom is \$891/month, while area median rent is \$944/month. This suggests that a little less than half of the housing is naturally occurring affordable housing that needs to be preserved.

Discussion

The state of housing affordability in Bethlehem is starkly illustrated by the fact that 23 percent of homeowners and 49 percent of renters spend more than 30 percent of their monthly income on housing costs. This cost burden is particularly severe for renters, who are more likely to be living in smaller units with fewer bedrooms. 2016-2020 ACS data highlights that 11 percent of families in Bethlehem live at or below the poverty level, with a sizable portion of households earning less than \$50,000 annually. This economic reality underscores the urgent need for affordable housing solutions, as many residents struggle to meet their housing costs.

The Comprehensive Housing Affordability Strategy (CHAS) data further reveals the disparity in housing affordability. While 17.7% of owner-occupied households face high housing costs, nearly half of renter households are similarly burdened. This is compounded by rising housing costs; median home values increased by 3% from 2015 to 2020, while median contract rents surged by 13% during the same period. The mismatch between income levels and housing costs is evident, with many households unable to afford the median rent or home value in Bethlehem. Addressing this issue requires targeted efforts to increase the availability of affordable housing units and support for low-income families to ensure housing stability and reduce the financial strain on residents.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Approximately 80 percent of the housing in the City of Bethlehem was constructed prior to 1979, as such, a substantial number of units are in need of repair and present a lead-based paint threat. The following data suggests that the owner-occupied units are in better shape and present fewer lead-based paint hazards compared to renter occupied units in overall percentage terms. However, in real numbers the threat of lead-based paint and housing with at least one condition is equally as significant among both types of housing in the City of Bethlehem.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

Units are in substandard condition when, while they may be structurally sound, they do not provide safe and adequate shelter, and in their present condition endanger the health, safety, or well-being of the occupants. Such housing has one or more defects, or a combination of potential defects in sufficient number or extent to require considerable repair or rebuilding or is of inadequate original construction. To be defined as substandard condition but suitable for rehabilitation, the estimated cost of the rehabilitation should normally not be more than 25 percent of the value of the property (including land) after rehabilitation. The rehabilitation should be of such scope that, when completed, all the components in the house are operable and should not be anticipated to require any work or major expense over and above normal maintenance for the first one-fourth to one-third of the mortgage term.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	2,710	18%	6,650	46%
With two selected Conditions	45	0%	360	2%
With three selected Conditions	20	0%	25	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	12,085	81%	7,465	51%
Total	14,860	99%	14,500	99%

Table 33 - Condition of Units

Data Source: 2016-2020 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	715	5%	1,275	9%
1980-1999	1,495	10%	2,310	16%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
1950-1979	6,630	45%	5,420	37%
Before 1950	6,015	40%	5,490	38%
Total	14,855	100%	14,495	100%

Table 34 – Year Unit Built

Data Source: 2016-2020 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	12,645	85%	10,910	75%
Housing Units build before 1980 with children present	770	5%	305	2%

Table 35 – Risk of Lead-Based Paint

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

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Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Refer to Lead-Based Paint Hazards narratives in SP-65.

Discussion

The data highlights significant differences in the condition of owner-occupied and renter-occupied units in the City of Bethlehem. Owner-occupied units are generally in better condition, with 81 percent having no selected conditions, compared to 51 percent of renter-occupied units. This suggests that owner-occupied units present fewer lead-based paint hazards and are less likely to require substantial repairs.

However, the real numbers indicate that the threat of lead-based paint and housing conditions is equally significant among both types of housing, given the considerable number of units constructed before 1979.

The jurisdiction defines substandard housing as units that, while structurally sound, do not provide safe and adequate shelter and endanger the health, safety, or well-being of occupants. Substandard units suitable for rehabilitation are those where the cost of repairs does not exceed 25 percent of the property's post-rehabilitation value. The data shows that renter-occupied units are more likely to have at least one selected condition, with 46 percent falling into this category, compared to 18 percent of owner-occupied units. This indicates a greater need for rental rehabilitation to ensure safe and adequate housing for renters. However, housing rehabilitation for both owners and renters should be a top housing priority for the City based on the age of the housing stock.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The City of Bethlehem does not own, manage, or fund public housing, but does have a strong and working relationship with the Bethlehem Housing Authority (BHA).

The Bethlehem Housing Authority conducted the Public Housing Assessment System (PHAS) Score Report for Interim Rule on July 23, 2019. PHAS Indicators include Physical, Financial and Capital Fund scores. The Authority reported a PHAS Total Score of 93 out of 100, making the Authority a High Performing Agency.

Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type			Vouchers			Special Purpose Voucher		
				Total	Project -based	Tenant -based				Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			1,454	497					0	0	0	
# of accessible units												

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Public Housing Condition

Public Housing Development	Average Inspection Score
Bartholomew House - APM #4	97
Fairmount Homes - AMP #1	74
Litzenberger House - APM #4	97
Lynfield Homes - AMP #3	89
Marvine - AMP #2	91
Monocacy Tower - APM #4	97
Pembroke - AMP #1	74
Pfeifle Homes - AMP #1	74
Bodder House - APM #4	97
Parkridge - AMP #3	89
Bayard Homes - AMP #5	96

Table 37 - Public Housing Condition

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Bethlehem Housing Authority (BHA) is also responsible for overseeing the City's public housing stock. Currently, there are five Asset Management Projects (AMPs) comprising 1,451 total public housing units in Bethlehem.

Public Housing Developments

Name AMP # of Units Notes

Pembroke 1 196 Renovation (upcoming project); roofing replacement (upcoming project)

Fairmont 1 120 Roofing replacement completed in 2022.

Pfeifle 1 50 Senior Housing

Marvine 2 389 Construction of 12 apartments at the former recreation building (upcoming project)

Lynfield Homes 3 200 Renovations were completed in 2023.

Parkridge 3 100 -

Litzenberger 4 101 Senior Housing; parking lot addition added in 2022.

Bodder 4 65 Senior Housing; HVAC replacements (upcoming project)

Bartholomew 4 65 Senior Housing; HVAC replacements (upcoming project)

Monocacy Tower 4 145 Senior Housing

Bayard Homes 5 20 -

In addition to the development-specific projects in the table above, the BHA is working on installing cameras in all High Rise parking lots for security surveillance. These cameras are looking to be installed on the exterior of the High Rises. Furthermore, they are planning to replace/upgrade older camera systems throughout our developments.

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The Bethlehem Housing Authority's 5-Year Plan outlines several key restoration and rehabilitation projects aimed at improving the quality and safety of housing units. The plan includes significant investments in high-rise buildings, such as upgrading elevator equipment and controls, replacing sewer lines, and renovating community room kitchens.

Projects include:

- The last 2 phases of the Lynfield renovations (completed 2023).
- The parking lot addition at Litzenberger (completed 2022).
- Roofing replacement at Fairmount (completed 2022).
- Starting renovations in the Pembroke development.
- HVAC replacements at Bodder and Bartholomew Houses
- Roofing replacement at Pembroke.
- The construction of 12 apartments at the former Marvine recreation building.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The Bethlehem Housing Authority (BHA) annually assesses the needs of each of the eleven public housing developments to determine renovation needs. Several developments have been made by Resident Councils that participate in the Housing Authority's Resident Advisory Board which makes recommendations for management and physical improvements.

Discussion:

The City of Bethlehem's relationship with the Bethlehem Housing Authority (BHA) is crucial for managing public housing needs, despite the city not directly owning, managing, or funding these units. The BHA's high performance, as evidenced by its PHAS Total Score of 93 out of 100, reflects its effective management and commitment to maintaining quality housing. The PHAS indicators, which include Physical, Financial, and Capital Fund scores, demonstrate the Authority's comprehensive approach to evaluating and improving public housing conditions. This high score indicates that the BHA is successfully meeting the standards required to provide safe and well-maintained housing for its residents.

The BHA oversees five Asset Management Projects (AMPs) comprising 1,451 public housing units, with various renovation and improvement projects underway or recently completed. These projects include roofing replacements, HVAC upgrades, and the construction of new apartments, which are essential for

maintaining the physical condition and livability of the housing units. The average inspection scores for these developments, ranging from 74 to 97, further highlight the Authority's efforts to ensure high standards of living. Additionally, the installation of security cameras in high-rise parking lots and the upgrading of older camera systems reflect the BHA's commitment to enhancing safety and security for residents.

The BHA's strategy for improving the living environment of low- and moderate-income families involves regular assessments and active participation from Resident Councils. These councils contribute to the Housing Authority's Resident Advisory Board, providing valuable recommendations for management and physical improvements. The BHA's 5-Year Plan outlines significant investments in high-rise buildings and authority-wide projects, focusing on both immediate and long-term needs. By addressing these needs through targeted renovations and upgrades, the BHA aims to create a safer, more comfortable living environment for its residents, ensuring that public housing remains a viable and supportive option for those in need.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The City of Bethlehem is part of the Lehigh Valley Regional Homeless Advisory Board (LV RHAB), which is the regional organization within the Pennsylvania Eastern Continuum of Care Collaborative. Agencies seeking funding through McKinney-Vento programs, including Supportive Housing Programs, Shelter Plus Care, etc. must be part of a cooperative effort within their communities. The Continuum of Care Plan includes the details on services and facilities available to the homeless throughout the region.

With the assistance of the Lehigh Valley Regional Homeless Advisory Board (LV RHAB), the facilities and services specific to the City of Bethlehem have been identified. The facilities include emergency shelters, transitional housing, and permanent housing. Services include prevention activities, outreach, and emergency supportive services.

Each year, the Lehigh Valley RHAB applies for competitive federal grants for the region to provide homeless housing and support services. The CoC's responsibilities include ensuring representation of key stakeholders; setting the agenda for full CoC planning meetings; conducting the annual homeless single Point-in-Time count; overseeing the various subcommittees and working groups; completing the annual CoC application; and assisting in reviewing programs, activities, data, and all other efforts that will eliminate homelessness and improve the well-being of homeless persons and families in Eastern Pennsylvania region.

In September 2023, the City released the Strategic Plan to Address Homelessness. The study was spurred by the anticipated need for a new Bethlehem Emergency Shelter (BES) site paired with the Lehigh Valley's alarming rise in housing instability and homelessness. The City sought to explore the feasibility of creating a privately-operated, year-round permanent homeless shelter as part of a multi-site, regional approach to address these dual crises while also building resilience in the region's homelessness and housing services. The resulting plan aims to highlight the systemic causes of homelessness and determine the most effective ways for the City to play an active and ongoing role in addressing homelessness within the City and the surrounding area.

The plan's approach focused on identifying a 'built solution' such as shelter, transitional housing, and/or supportive housing and evaluated the City of Bethlehem's potential role within the scope of the built solution. The analysis found the City is best suited to bookend both ends of the homelessness services pipeline: emergency sheltering and affordable housing.

This plan and its recommendations align with nationally recognized best practices supported by the National Alliance to End Homelessness and the United States Interagency Council on Homelessness. Not only does the plan leverage and align with national best practices, but its findings and recommendations are rooted in months of interviews and surveying of local practitioners serving those experiencing homelessness as well as those with lived experience.

The City of Bethlehem's Strategic Plan to Address Homelessness offers the City and its partners, both local and regional, a blueprint for collaboration, partnership, sustained action, and investment to ensure our neighbors are sheltered and supported.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	843	0	106	376	0
Households with Only Adults	542	0	272	1,295	0
Chronically Homeless Households	0	113	0	0	0
Veterans	7	0	37	481	0
Unaccompanied Youth	29	202	41	48	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Data Source Comments: Coc HIC State of PA 2024: https://files.hudexchange.info/reports/published/CoC_HIC_State_PA_2024.pdf

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Emergency Support Services

Several agencies in the County provide short-term emergency assistance to the homeless and those at risk of becoming homeless. Food baskets and vouchers are supplied by agencies such as the American Red Cross, Catholic Charities, the Hispanic Center of the Lehigh Valley, New Bethany, the Salvation Army, Second Harvest Food Bank, and local church organizations.

A variety of Supportive Services are provided by the following agencies in the areas of Case Management (CM), Life Skills (LS), Alcohol & Drug Abuse (DA), Mental Health Counseling (MHC), Healthcare (H), HIV/AIDS (HIV), Education (Ed), Employment (Em), Child Care (CC) and Transportation (T).

- AIDSNET – HIV
- ARC of Lehigh & Northampton Counties – Em
- Bethlehem Area Vocational-Technical School – Em
- Career Link (WIB) – Em
- Community Action Committee of Lehigh Valley – CM, LS
- Community Services for Children – Ed
- Council of Spanish Speaking Organizations of Lehigh Valley – Em
- Head Start of the Lehigh Valley – Ed, CC
- Hispanic Center of Lehigh Valley -- CM, LS
- LANTA METRO – T
- LANTA METRO PLUS – T
- New Bethany – CM, LS
- Northampton Co. Mental Health, Intellectual Disabilities, Drug & Alcohol – AD, MHC
- Step By Step, Inc. – CM, LS, DA, MHC
- Salvation Army – CM, LS
- Turning Point of Lehigh Valley – CM, LS
- Unity House of Bethlehem – MHC
- Valley Youth House – CM, LS
- VAST – T
- VIA – Ed
- Victory House of the Lehigh Valley – CM, LS
- Work/Life Center (Northampton Community College) – Ed

Information/Referral and Outreach

The Area Agency on Aging provides a 24-hour response service called the Personal Emergency Response System. This system provides two-way communication equipment for the frail elderly to allow immediate access to emergency assistance. In addition, the non-profit organization, Turning Point operates a Domestic Abuse Hotline that is likewise available on a 24/7 basis. Valley Youth House provides Street Outreach services. Other emergency situations require the use of the County 911 system.

Homeless Prevention Services

In addition, the following agencies also provide Mortgage Assistance (MA), Rental Assistance (RA), Utilities Assistance (UA), Counseling/Advocacy (CA) and Legal Assistance (LA) where needed to prevent homelessness.

- Alliance for Building Communities – CA
- Community Action Committee of the Lehigh Valley – CA
- New Bethany -- RA, UA
- Lehigh & Northampton County Assistance Offices (Emergency Shelter Allowance) – RA
- Lehigh & Northampton County Assistance Offices (LIHEAP) – UA
- Neighborhood Housing Services of the Lehigh Valley – CA
- North Penn Legal Services – LA
- Salvation Army – MA, RA, UA

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Through the Continuum of Care (CoC), individuals and families have access to services including outreach services, emergency shelter, transitional housing, rapid rehousing, and permanent supportive housing. These resources are available through Connect to Home, the CoC's Coordinated Entry system. Homeless outreach services connect individual experiencing homelessness residing in an unsheltered situation, who are often the least likely to engage in the traditional homeless service system, the opportunity to receive services where they include access to services/referrals and support with immediate needs.

For individuals and families experiencing an immediate housing crisis, emergency shelter provides an immediate resource to help the individual/family stabilize and access referrals to access housing-focused case management to identify alternate housing resources in the community or access referrals to longer-term housing resources through the Continuum of Care.

In recent years, HUD funding has expanded for Rapid Rehousing (RRH) interventions, which provides short to medium term rental assistance (typically three to six months, or up to 12 months) for individuals and families experiencing homelessness. Rapid Rehousing programs provide rental assistance and security deposits as well as landlord advocacy, assistance with finding affordable housing and case management assistance to families and/or individuals who are homeless with the goal of moving them into permanent housing. Rapid Rehousing is often used as an intervention for families with children, in order to quickly stabilize families experiencing homelessness in community-based housing.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

Certain population groups require supportive services and/or supportive housing, either on a permanent basis or on a temporary basis. Many special needs populations are very low-income households (below 50 percent of Median Family Income) because they are not able to work or can only work part-time. Special population groups include the frail elderly, the physically and developmentally disabled, severely mentally ill persons, persons with HIV/AIDS and those with substance abuse issues. Many Special Needs individuals rely on Supplemental Security Income (SSI) for financial support. SSI provides income support to persons 65 years and over, the blind and people with disabilities.

Since so many special needs people have limited incomes, finding affordable and accessible housing is often a serious challenge. Even when new affordable rental housing is developed, the rental rates for the housing units are often too high for many.

One common concern is that more and larger housing units are needed to accommodate families taking care of individuals with special needs. Many families would like to take care of their own family members with special needs, if supportive services, respite for caregivers and appropriate accommodations could be provided. In the case for the physically disabled population and persons with AIDS/HIV, much of the supportive housing can only accommodate the individual with special needs, isolating them from the supportive environment of a family.

Another concern is that most housing programs/facilities fail to recognize the persons with special needs often have multiple special needs. Most residential facilities are often targeted for single specific conditions, such as the mentally ill, the developmentally disabled or substance abusers.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Elderly /Frail Elderly: The goal of County Area Agencies on Aging is to enable the elderly to age in place. An array of in-home services is offered to make this possible, including adult day care, in-home health care, personal care, and personal emergency response systems. The PA Caregiver Support Program provides reimbursement of out-of-pocket expenses to family members who provide care for aged relatives.

To allow the frail elderly to remain in their homes, home modifications are usually required, including grab bars, wheelchair ramps, or accessible doorways. Other service needs include chore services and in-home medical services. Services are provided through the Northampton County Area Agency on Aging, which plans and coordinates the provision of services to older adults. The BHA provides housing units restricted to seniors.

Persons with Disabilities: For homeowners with physical disabilities, there is a need for home modifications to make the premises accessible. For renters, the most significant need is to be able to find affordable and accessible housing. Housing advocates note that people with disabilities still face problems in requesting reasonable modifications in their rental units, and that many disabled renters need financial assistance to carry out accessibility modifications. The Federal Fair Housing law requires that new construction or major renovations of buildings with four or more units contain accessible units.

Services are provided to the physically disabled through the PA Department of Public Welfare and locally through the Lehigh Valley Center for Independent Living. Persons with mental health disabilities range from those who can live and work within the community to those with severe mental illness who require special housing accommodations, consistent medical attention, and supportive services. Mental health clients are typically low income, and their illnesses often result in rental or credit histories that do not meet typical rent requirements, limiting their housing options. Housing can be a constant struggle for the severely mentally ill.

Persons with HIV/AIDS: The primary provider of housing and services to persons with AIDS is AIDSNET, a private, non-profit organization, which is one of seven federally mandated HIV/AIDS coalitions in Pennsylvania. AIDSNET is responsible for the development of a comprehensive continuum of prevention and care services. The organization's efforts are aimed at both stopping the spread of HIV infection and providing medical and social services to those who have been infected. AIDSNET has an office in Bethlehem.

Victims of Domestic Violence: Turning Point of the Lehigh Valley (TPLV) provides Domestic Violence services and housing. TPLV is a safe place for victims of domestic violence and their children. TPLV's mission is to work toward the elimination of domestic violence, increase community awareness and empower victims by providing shelter and support services.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

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Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The City intends to create and increase homeownership opportunities by investing in the rehabilitation of housing units for low-income families. The City's owner-occupied housing rehab program helps keep homeowners in their homes and out of the homeless or social support system.

The Representative Payee Program operated by New Bethany provides financial management services - including paying rent on time - to individuals with mental health and other challenges. The Lehigh Valley Center for Independent Living's PLACE program helps locate housing for special needs residents.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

n/a

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City of Bethlehem on an ongoing basis examines the City's public policies with regard to the costs of housing to the incentives to develop, maintain or improve affordable housing in the City. The City's Zoning Ordinance provides for a variety of housing types and various densities and varying lot sizes. This variety reduces the potential for barriers to affordable housing as a result of regulatory policies. In addition, the City's Zoning Ordinance allows for emergency shelters, transitional housing, permanent supportive housing, and group homes for people with disabilities. Bethlehem does not impose impact fees for development and permit fees are reasonable. Additionally, the City's Zoning Ordinance has a chapter on Workforce Housing Incentives to allow greater density when incorporating affordable housing units.

The City has historically allocated CDBG and HOME resources for direct housing assistance, including its Housing Rehabilitation Assistance Program for lower income homeowners, the Down payment, and Closing Cost Assistance Program to assist first time buyers, rehabilitation assistance to non-profit organizations for creation of transitional housing and affordable rental and for sale housing.

The City continues to fund the Lehigh Valley Center for Independent Living to assist disabled persons obtain and maintain housing. Funds have also been used to assist housing related initiatives including the Community Action Committee of the Lehigh Valley and Neighborhood Housing Services of the Lehigh Valley, both of which are HUD certified housing counselors.

Bethlehem implements Lead Safe practices in carrying out rehab activities whenever possible using funds from the CDBG and HOME Programs and maintains a pool of qualified contractors to address lead-based paint hazards effectively and efficiently.

The City's Health Bureau receives funding from the state's Lead Hazard Control Program to control lead-based paint hazards in target housing in high-risk areas. The City performs eligibility determinations on potentially eligible units, prioritizing units and performing lead-based paint combined inspection/risk assessments, lead-based paint hazard control related procedures and clearance procedures on those units.

The City's Code Enforcement Office works to see that codes are properly enforced and encourages affordable housing developers to introduce innovative/cost effective construction techniques and act as liaison between City and developers.

The City will use the Zoning Ordinance to work with private developers to utilize a density bonus to foster affordable housing development within the City. The City will advocate for other regulatory options to increase affordable housing.

In November 2023, the City released Opening Doors: Strategies to Building Housing Stability in Bethlehem, a comprehensive housing strategy. The document was updated in June 2024. The document includes a thorough examination of the housing needs in Bethlehem, existing housing conditions, housing challenges, and feedback from community engagement. Using this information, a housing plan is presented with five strategies and ten projects. Two of these projects were to update City zoning to encourage neighborhood compatible infill affordable housing development and pilot an accessory dwelling unit program.

The accessory dwelling unit project is underway. Bethlehem has launched a pilot project to build alley houses, which are compact, self-contained secondary housing units on the same lot as an existing home. This initiative is a collaboration between the City, local nonprofits, and Lehigh University. The first alley house, a two-bedroom, 740-square-foot unit, will be constructed behind 1604 W. Broad Street. The project aims to address the City's affordable housing crisis by exploring the feasibility of integrating more accessory dwelling units (ADUs) into the community. If successful, this pilot could lead to the construction of 15 to 30 additional units over the next five years.

Additionally, the City will incorporate affordable housing requirements into development incentives, such as Local Economic Revitalization Tax Assistance and Tax Increment Financing, when appropriate. The City will continue programs to improve the housing stock occupied by low-to-moderate income households and to assist lower income persons to become homeowners. Assistance to developers of affordable housing, for both owners and renters will be ongoing. Assistance to low-to-moderate income homeowners for housing rehabilitation, assistance to low-to-moderate income households to become homeowners, assistance to for-profit and non-profit developers to create affordable for sale housing and rental housing and to rehabilitate existing affordable rental developments for their continued viability as affordable units.

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

Introduction

Bethlehem is one of the economic centers of Lehigh Valley, and it encompasses major employers in the form of universities, hospitals, casino-hotels, and large retail establishments. This section details business activity, the labor force, commuting patterns, education, workforce needs, and economic development initiatives. Needs Assessment section NA-50 (Non-Housing Community Development Needs), describes the city's needs for public facilities, improvements, and services.

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	80	18	0	0	0
Arts, Entertainment, Accommodations	3,945	5,849	13	17	4
Construction	1,190	1,030	4	3	-1
Education and Health Care Services	7,967	10,680	27	31	4
Finance, Insurance, and Real Estate	1,691	1,730	6	5	-1
Information	545	1,244	2	4	2
Manufacturing	3,240	3,433	11	10	-1
Other Services	1,026	1,065	3	3	0
Professional, Scientific, Management Services	2,467	2,747	8	8	0
Public Administration	0	0	0	0	0
Retail Trade	3,793	3,029	13	9	-4
Transportation and Warehousing	2,457	3,176	8	9	1
Wholesale Trade	1,387	877	5	3	-2
Total	29,788	34,878	--	--	--

Table 40 - Business Activity

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

Labor Force

Total Population in the Civilian Labor Force	37,401
Civilian Employed Population 16 years and over	37,394
Unemployment Rate	6.00
Unemployment Rate for Ages 16-24	13.00
Unemployment Rate for Ages 25-65	4.00

Table 41 - Labor Force

Data Source Comments:

Occupations by Sector	Number of People
Management, business and financial	8,025
Farming, fisheries and forestry occupations	1,020
Service	4,270
Sales and office	6,665
Construction, extraction, maintenance and repair	1,745
Production, transportation and material moving	2,310

Table 42 – Occupations by Sector

Data Source: 2016-2020 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	24,310	75%
30-59 Minutes	5,485	17%
60 or More Minutes	2,647	8%
Total	32,442	100%

Table 43 - Travel Time

Data Source Comments:

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	1,505	190	1,400

Educational Attainment	In Labor Force			Not in Labor Force
	Civilian Employed	Unemployed		
High school graduate (includes equivalency)	8,290	415		2,630
Some college or Associate's degree	7,535	320		2,635
Bachelor's degree or higher	10,145	285		1,570

Table 44 - 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	0	0	0	0	0
9th to 12th grade, no diploma	496	0	0	0	0
High school graduate, GED, or alternative	2,826	10,708	10,622	13,682	12,124
Some college, no degree	7,299	0	0	0	0
Associate's degree	0	0	0	0	0
Bachelor's degree	963	4,586	5,026	3,308	4,173
Graduate or professional degree	0	0	0	0	0

Table 45 - Educational Attainment by Age

Data Source Comments: 2023 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	27,639
High school graduate (includes equivalency)	35,481
Some college or Associate's degree	39,875
Bachelor's degree	46,104
Graduate or professional degree	60,442

Table 46 – Median Earnings in the Past 12 Months

Data Source Comments:

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

A plurality of workers is employed in the Education and Health Care Services Sectors, accounting for 29 percent of workers. This is primarily because Bethlehem is the home of Lehigh University, Moravian

University, Satellite Campus of Northampton Community College, a large public-school district, and two large health networks including St. Luke's and Lehigh Valley Health Network. The second (and third) greatest number of workers (11 percent) work in Arts, Entertainment, Accommodations, which many of the jobs at the Wind Creek Casino-Hotel. Banana Factory and SteelStacks fall under Manufacturing (11 percent). The fourth greatest number of workers (9 percent) are in the retail trade. Many of these workers are employed at the thriving Main Street and Southside businesses and Outlets at Wind Creek Bethlehem.

Describe the workforce and infrastructure needs of the business community:

According to the Workforce Board Lehigh Valley (WBLV) Local Plan published in 2021, ten-year projections show a trend that skills will be needed in growth occupations of Healthcare Support, Personal Care and Service Workers, Healthcare Practitioners, Food Preparation and Serving Workers, as well as Transportation and Material Moving Occupations. Meanwhile, the following are expected to remain flat or decrease in jobs: Sales and Related Occupations, Production Workers, and Office and Administrative Support. The 2022 Lehigh Valley Talent Supply Study found that 89 percent of employers who participated in the survey reported challenges with hiring, recruiting, or retaining employees. As the City's economy continues to evolve, there will be an ongoing need for workforce training and education programs that address the current needs of area employers. On the employer end, expansion to include hiring non-traditional backgrounds will increase candidate pools.

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.

The Lehigh Valley's GDP has grown significantly, reaching nearly \$56 billion in 2024, driven by sectors like manufacturing, healthcare, and information technology, which attract new businesses and increase job opportunities. Significant investments are being made in infrastructure, including transportation projects worth over \$4.39 billion, aimed at improving roadways, pedestrian access, and public transit to support the region's growing population.

With the economic growth and new investments in the Lehigh Valley, there is a significant need for workforce development programs to upskill and reskill workers, particularly in high-demand sectors like manufacturing and healthcare. Business support needs include resources like business incubators and entrepreneurship programs at local colleges, which provide essential support for new and existing businesses. Infrastructure needs are addressed through transportation projects, including road improvements and enhancements to public transit systems, which are crucial to accommodate the growing population and ensure efficient movement of goods and people.

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

The Lehigh Valley's GDP has grown significantly, reaching nearly \$56 billion in 2024, driven by sectors like manufacturing, healthcare, and information technology, which attract new businesses and increase job opportunities. Significant investments are being made in infrastructure, including transportation projects worth over \$4.39 billion, aimed at improving roadways, pedestrian access, and public transit to support the region's growing population.

With the economic growth and new investments in the Lehigh Valley, there is a significant need for workforce development programs to upskill and reskill workers, particularly in high-demand sectors like manufacturing and healthcare. Business support needs include resources like business incubators and entrepreneurship programs at local colleges, which provide essential support for new and existing businesses. Infrastructure needs are addressed through transportation projects, including road improvements and enhancements to public transit systems, which are crucial to accommodate the growing population and ensure efficient movement of goods and people.

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.

There are several workforce training initiatives in the Lehigh Valley that work to support communities highlighted in this Consolidated Plan. They include:

- Lehigh Valley Workforce Board: This organization plays a crucial role in coordinating and funding workforce training programs. They offer services through PA CareerLink® centers, which provide job seekers with access to training, education, and employment opportunities.
- Northampton Community College: This community college offers a range of workforce training initiatives, including open enrollment courses, customized training for businesses, and specialized programs in technical and industrial fields. Their efforts include practical skills training in manufacturing, automotive inspection, and electronics, as well as leadership development and one-on-one coaching. NCC also partners with WEDnetPA to provide free training for workers.
- Manufacturers Resource Center: This organization helps small and mid-sized manufacturers become more competitive, adopt lean and agile processes, strategically grow their companies, and invest more effectively in their existing human capital.

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

Yes

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.

<TYPE=[text] REPORT_GUID=[F8DC4D3147433947165558A235C46686]
PLAN_SECTION_ID=[1370705000]>

Discussion

n/a

MA-50 Needs and Market Analysis Discussion

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

Bethlehem has four 2025 HUD Qualified Census Tracts (QCTs). QCTs must have 50 percent of households with incomes below 60 percent of the Area Median Gross Income (AMGI) or have a poverty rate of 25 percent or more. Since housing cost is a primary housing problem, it can be inferred that QCTs have a concentration of housing problems. The QCTs in Bethlehem are 011000, 011200, 010800, and 010500.

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

HUD defines racially or ethnically concentrated areas of poverty (R/ECAPs) as census tracts with a non-white population of 50 percent or more, and a poverty rate that either exceeds 40 percent of the population or is three or more times higher than the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. See below a list of census tracts which are considered R/ECAP areas. In addition, the map below displays R/ECAP census tracts in pink. Racially/Ethnically Concentrated Areas of Poverty by Census Tract in the City of Bethlehem include Tracts 011000 and 010500.

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

As part of the Opening Doors: Strategies to Build Housing Stability in Bethlehem process, a market value analysis was conducted of the four areas of Bethlehem. The information below summarizes the findings: Downtown Bethlehem:

- Market Characteristics: High demand for rental housing, low vacancy rates, and a mix of historic and modern housing options.
- Challenges: Limited availability of affordable housing and high property values.
- Strategies: Focus on mixed-use developments and partnerships with local institutions to create affordable housing units.

Southside Bethlehem:

- Market Characteristics: Diverse housing stock, including older homes and newer developments. Higher concentration of rental properties.
- Challenges: Economic disparities and need for revitalization.
- Strategies: Redevelopment initiatives, community development activities, and employer-assisted housing programs.

West Bethlehem:

- Market Characteristics: Predominantly single-family homes with moderate property values.
- Challenges: Aging housing stock and need for maintenance and rehabilitation.
- Strategies: Incentives for home improvements and assistance programs for homeowners.

North Bethlehem:

- Market Characteristics: Mix of suburban and rural housing, with larger lots and higher property values.
- Challenges: Limited availability of affordable housing and higher costs of living.
- Strategies: Development of accessory dwelling units and partnerships with non-profit developers to create affordable housing options.

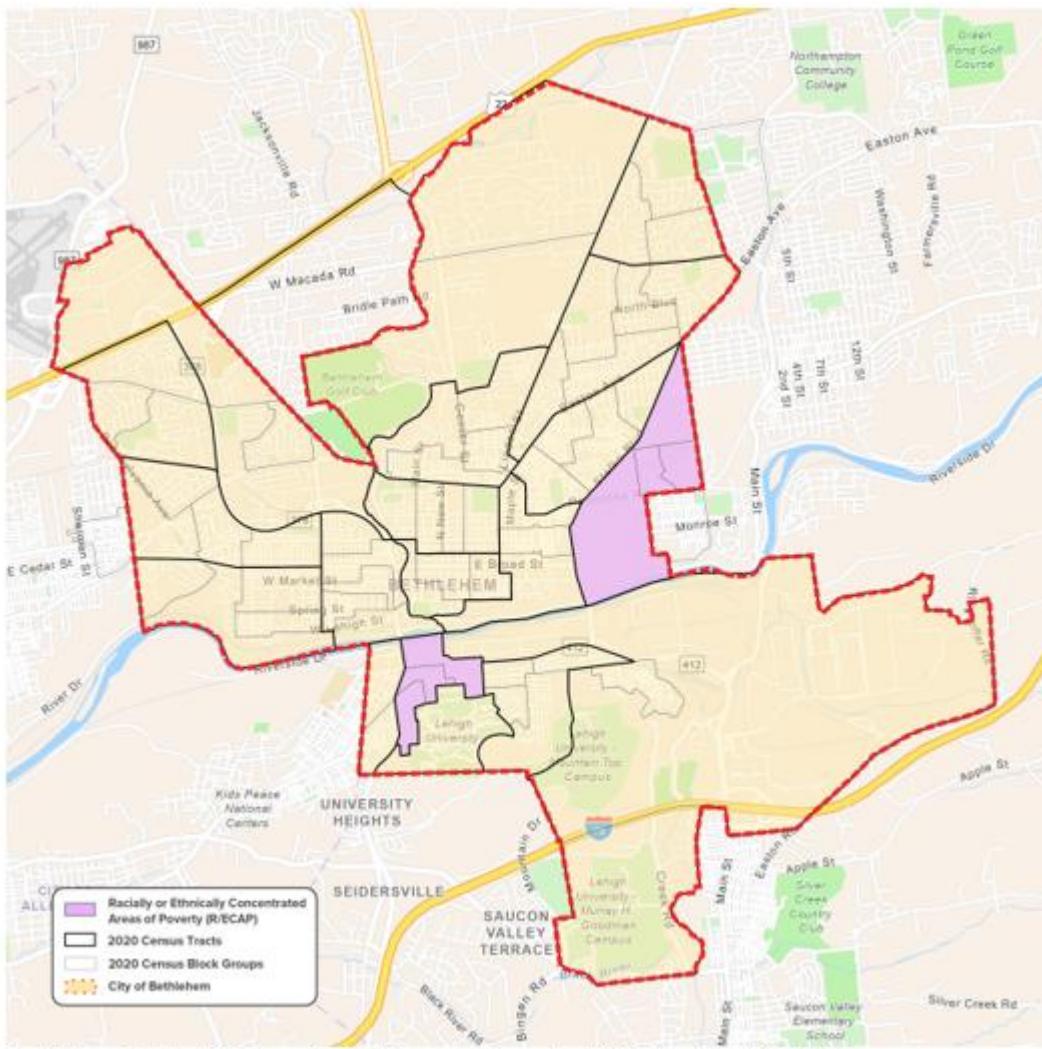
Are there any community assets in these areas/neighborhoods?

There are many community assets in these neighborhoods ranging from large retail enterprises; new hotels and hospitality venues; educational and arts facilities; large employers; government offices and buildings including those owned by the City's Housing Authority; medical and service institutions; historic structures; and bike trails and open spaces. The environment in these neighborhoods and the number of existing and potential stakeholders who can collaborate in the development of affordable and market rate housing is very favorable.

Are there other strategic opportunities in any of these areas?

The Opening Doors Plan offers the following strategies for neighborhoods in Bethlehem:

- Update Zoning and Land Use: Encourage a variety of housing types and infill development to increase housing options.
- Offer Incentives: Create and preserve affordable housing through various incentives.
- Foster Partnerships: Collaborate with the Bethlehem Housing Authority and local institutions to support new housing and community investment.
- Protect Tenants: Implement measures to protect tenants at risk of displacement and increase the supply of deeply affordable rental units.
- Advocate for Policies: Support state-enabling affordable housing policies, programs, and regional housing planning.



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.

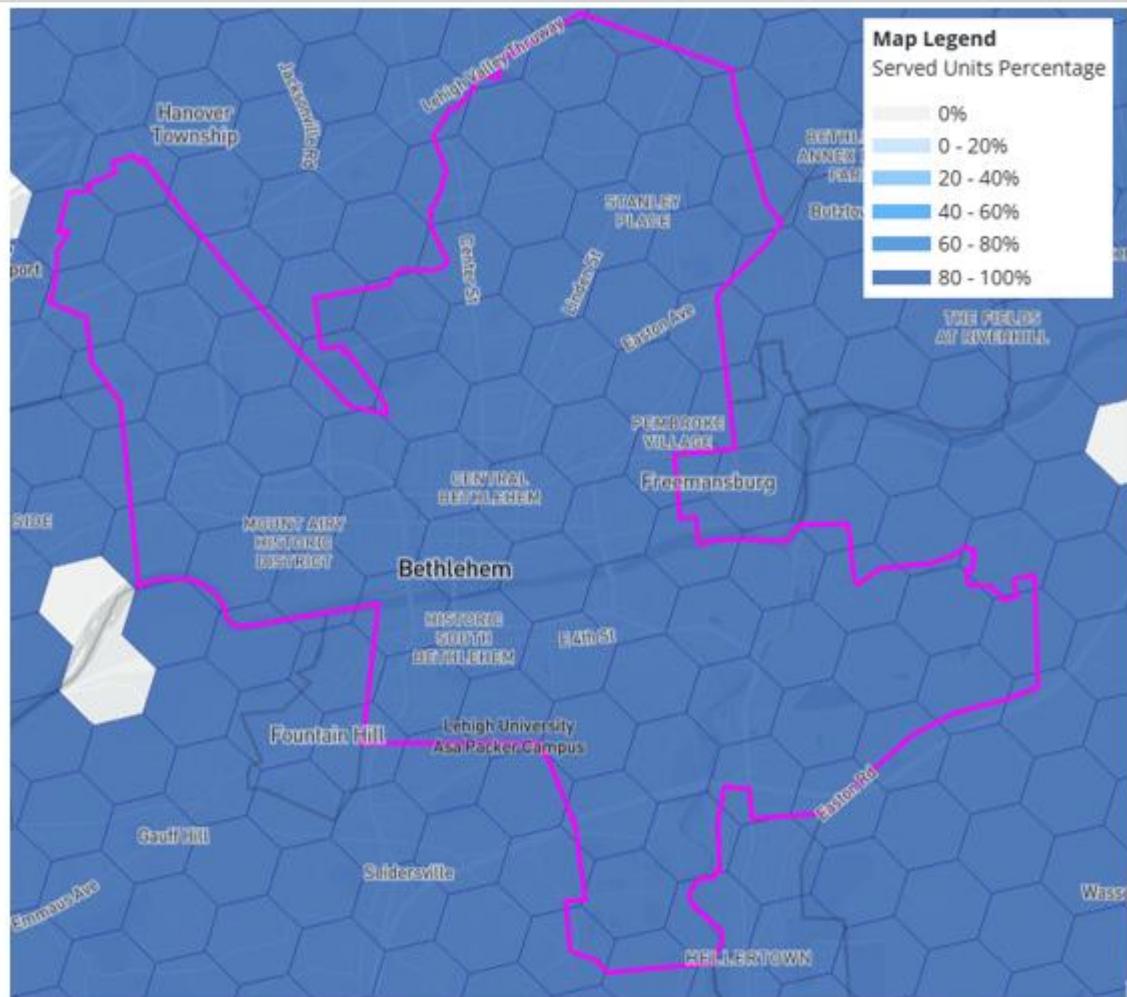
As evidenced by the map in this section derived from data from the Federal Communications Commission, the entirety of Bethlehem is wired for broadband. However, just because there is broadband availability does not mean that all households can afford it. Some households may struggle to pay for broadband.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

As evidenced by the map in this section derived from data from the Federal Communications Commission, Bethlehem is 100 percent covered for broadband access. The vast majority of Bethlehem has multiple broadband internet service providers.

Having several ISP options potentially results in improved prices and services for consumers. As the competition within the broadband industry intensifies, service providers are continuously seeking innovative strategies to retain their customer base and expand their market share. Broadband bundling not only responds to this competitive demand but also addresses the diverse needs of the population and can help broadband access make financial sense for broader swaths of the population.

According to BroadbandNow, the following nine ISPs currently have plans available in the City: Astound Broadband, AT&T, Hughesnet, One Ring Networks, Service Electric, Starlink, T-Mobile US, XNET WiFi, Verizon, and Viasat Inc. Plans start at \$20 per month with Service Electric, followed by \$40 with Verizon. In 2024, Verizon Fios expanded in Lehigh Valley to create thousands of newly eligible households for their service. The expansion increases their competition with more popular providers in the area, such as Astound Broadband and Service Electric.



Availability of Broadband Service: Residential, Any Technology with Speed $\geq 100/20$

Data Source: Federal Communications Commission

Broadband Availability

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 Lehigh Valley is vulnerable to a variety of natural hazards such as flooding and a growing number of man-made hazards that include gas/liquid pipelines and cyber-terrorism. Hazard mitigation planning can lessen the impact of such events by using an initiative-taking approach of assessing the risk and then identifying actions to create safe, more disaster-resilient communities. The 2024 Lehigh Valley Hazard Mitigation Plan (LVMHP) outlines targeted actions aimed at meeting immediate planning goals while supporting a long-term vision for the community. It was developed with multiple jurisdictions' representatives. The 2024 LVMHP mentions a connection between extreme weather and increased risk of the following natural hazards:

- occurrences of severe storms
- more severe and frequent flooding events
- altered drought dynamics
- extreme temperatures
- opportunity for invasive species
- landslides
- wildfires
- more intense and frequent lightning events
- accelerated mosquito development, which incubates the West Nile virus, and a wider range of ticks, which carry Lyme disease

These natural hazards will have numerous impacts. The dam structures and levees may not be suitable for increased rainfall. Higher temperatures and drier conditions could increase structural fires, in addition to wildfires. Utility services, such as electricity, water, and gas, could also have increased disruptions with the increase of the above natural hazards.

The City's most significant natural hazard risk associated with extreme weather events is flooding. Specifically, the Lehigh River, Monocacy Creek, Saucon Creek all post a natural hazard risk to nearby residents and businesses.

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

Low-to-moderate income households in the City of Bethlehem face compounded risks from natural hazards due to factors like limited financial resources and lack of mobility. Low-income households might lack access to housing or live in homes that are less equipped to endure extreme weather. Even if the homes are equipped with proper heating and cooling, these expenses may not be affordable for low- and moderate-income households. Overall, low- and moderate-income households in Bethlehem are especially vulnerable to natural hazards due to economic limitations that hinder their ability to prepare for, respond to, and recover from such events. According to the National Flood Insurance Firm

Maps, many of the flood hazards in the City of Bethlehem are located near concentrations of low-to-moderate income families.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

In constructing its plan for the next five years of CDBG and HOME funding, the City of Bethlehem has considered the following:

- Successes and challenges of implementing the 2020-2024 Consolidated Plan.
- Community descriptions of need, both those directly collected for this plan and those gathered during the course of completing related plans, both citywide and neighborhood specific.
- The capacity of the City's implementation mechanisms - both internal and through partnerships - to effectively address the issues identified within the restraint of budgets and personnel resources.

We believe that this process has resulted in a realistic strategy for the efficient, effective use of CDBG and HOME resources. Bethlehem intends to make full use of the flexibility inherent in the CDBG program to address the variety of needs identified throughout its community. Additionally, CDBG efforts will be coordinated with the housing support available through the HOME program.

Starting with the 2025 Annual Action Plan that is part of this Consolidated Plan and continuing with the four Action Plans to follow in subsequent years, Bethlehem will identify specific goals to be met each year and the specific activities that will be supported to achieve those goals.

The overall needs, identified through extensive community input for this and other related plans, which will be addressed over the next five years are:

- Improve existing housing stock, both rental and owner-occupied
- Increase home ownership opportunities
- Improve public spaces, including parks, streets, and other infrastructure
- Enhance public safety through services and environmental improvements such as lighting
- Support economic development, including infrastructure improvements to commercial areas serving nearby residential neighborhoods and through support for commercial facade improvements
- Support neighborhood stabilization efforts and blight elimination initiatives through increased code enforcement and property clearance or rehab programs
- Support a wide range of eligible public services and facilities, including affordable childcare, before- and after-school programming, job readiness services, mental health services, child nutrition services, financial literacy programs (including foreclosure prevention) and food pantries and homeless shelters.

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

Geographic Area

Table 47 - Geographic Priority Areas

1	Area Name:	City of Bethlehem
	Area Type:	
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Other
	Other Revital Description:	ADA Improvements in the City
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
2	Area Name:	Northside 2027
	Area Type:	Strategy area
	Other Target Area Description:	
	HUD Approval Date:	6/5/2020
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	The boundaries for the target area can be found on page 13 of the Northside 2027 Plan.

Include specific housing and commercial characteristics of this target area.	The housing and commercial characteristics can be found on page 28 of the Northside 2027 Plan.
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Appendix A and page 34 of the Northside 2027 Plan discuss a robust consultation and citizen participation process.
Identify the needs in this target area.	A complete discussion of the needs of the target area can be found on pages 24 through 32 of the Northside 2027 Plan.
What are the opportunities for improvement in this target area?	Opportunities are discussed on page 32 of the Northside 2027 Plan.
Are there barriers to improvement in this target area?	Constraints are discussed on page 32 of the Northside 2027 Plan.

General Allocation Priorities

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

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

Some of the needs the Consolidated Plan seeks to address exist citywide. Housing rehab, assistance to seniors and services for special needs populations are not limited by geographic boundaries.

Over the next five years, CDBG and HOME resources will be allocated geographically as:

- Citywide - for housing rehab and other activities noted above that address needs exist throughout the City
- Northside 2027 Neighborhood - Bethlehem received approval from the U.S. Department of Housing and Urban Development (HUD) to establish this area as a Neighborhood Revitalization Strategy Area (NRSA) to support community revitalization efforts. NRSA designation creates greater flexibility in the use of federal Community Development Block Grant (CDBG) funding allowing the City to target resources in a defined area.
- Other low-mod areas - largely, but not exclusively, on the City's southside. While focusing on the Northside, the City will remain cognizant of the fact that work remains on the Southside as well and will seek to leverage CDBG and HOME resources here with other federal, state, and local support.

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

Priority Needs

Table 48 – Priority Needs Summary

1	Priority Need Name	Improve the quality of existing housing
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Elderly Persons with Physical Disabilities
	Geographic Areas Affected	Northside 2027
	Associated Goals	Create and Preserve Affordable Rental Housing Preserve Owner-Occupied Housing Address Impediments to Fair Housing Choice Planning and Administration Support Homeowners and Renters (NS)
	Description	This priority need focuses on existing homes in the City, owned or rented by low-to-moderate income households. Improvements may correct code violations, improve energy efficiency, or remove architectural barriers for residents with mobility impairments.
	Basis for Relative Priority	An extensive waiting list for housing rehabilitation assistance is the basis for this need.
2	Priority Need Name	Increase the rate of homeownership
	Priority Level	High

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly
	Geographic Areas Affected	Northside 2027
	Associated Goals	Enhance Homeownership Opportunities Address Impediments to Fair Housing Choice Planning and Administration
	Description	This priority strives to help City renters become City homeowners through development of new ownership housing for income-eligible families and the provision of homebuyer assistance.
	Basis for Relative Priority	Public input regarding the desirability of encouraging and facilitating homeownership as a means of helping families and stabilizing neighborhoods.
3	Priority Need Name	Provide quality infrastructure and community facil
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly
	Geographic Areas Affected	Northside 2027
	Associated Goals	Improve Public Facilities and Infrastructure Planning and Administration Safety and Mobility for All Modes of Transportatio Enhance and Beautify the Public Realm (NS) Physical Improvements to Broad Street Corridor (NS Physical Improvements to Linden Street Corridor (N

	Description	Provide residents with high quality, modern infrastructure, and community facilities. The scope of this priority includes water and wastewater systems, roads, sidewalks, and parks owned by the City. The priority also includes improvements to buildings and facilities owned by local nonprofits that provide services to low-to-moderate income residents.
	Basis for Relative Priority	City experience shows that public improvements support service delivery, raise the quality of life and stabilize neighborhoods. Public input showed a desire to continue such efforts.
4	Priority Need Name	Enhance public safety
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Elderly Non-housing Community Development
	Geographic Areas Affected	Northside 2027
	Associated Goals	Improve Public Facilities and Infrastructure Planning and Administration Enhance Quality of Life for All Residents (NS)
	Description	This priority represents a need to improve public safety systems, including crime reduction measures, removal of architectural barriers from public spaces, and improving traffic and pedestrian systems.
	Basis for Relative Priority	City experience shows that increased police patrols, support for community watch groups, information on crime prevention and lighting and other physical improvements reduce crime. Community input pointed to a need to increase both real and perceived safety in target neighborhoods.
	Priority Need Name	Support the Growth of the Local Economy
5	Priority Level	High

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Public Housing Residents Non-housing Community Development
	Geographic Areas Affected	Northside 2027
	Associated Goals	Create and Preserve Local Jobs Planning and Administration Support Existing Businesses and Attract New Ones (NS) Enhance Quality of Life for All Residents (NS)
	Description	This priority reflects the need for a strong, resilient local economy. Projects may include efforts in operating assistance, job creation, property repurposing, job training and other workforce development, and including infrastructure improvements to commercial areas serving nearby residential neighborhoods and through support for commercial facade improvements.
	Basis for Relative Priority	In prior Strategic Plans, this priority was described as a low need. However, the need to support local businesses has dramatically increased with the COVID-19 pandemic.
6	Priority Need Name	Foster Strong, Vibrant Neighborhoods
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children
	Geographic Areas Affected	Northside 2027

	Associated Goals	Preserve Owner-Occupied Housing Address Impediments to Fair Housing Choice Support Homeless Housing and Services Planning and Administration Enhance and Beautify the Public Realm (NS) Enhance Quality of Life for All Residents (NS) Expand the Availability of Services (NS)
	Description	This priority reflects the importance of having strong, safe communities. Projects may include enhanced enforcement of property maintenance codes, clearance of vacant properties, and demolition of unsafe structures.
	Basis for Relative Priority	Past efforts to enhance enforcement of property maintenance codes have been deemed highly effective in improving neighborhood conditions and safety. However, the need remains high to address novel issues and support the gains that have already been made in the City.
7	Priority Need Name	Enhance the Availability of Community Services
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Frail Elderly Persons with Mental Disabilities
	Geographic Areas Affected	Northside 2027
	Associated Goals	Support Homeless Housing and Services Support High Quality Public Services Planning and Administration Enhance Quality of Life for All Residents (NS) Expand the Availability of Services (NS)

	Description	This priority need support a wide range of eligible public services, including affordable childcare, before- and after-school programming, job readiness services, mental health services, child nutrition services, financial literacy programs (including foreclosure prevention) and food pantries and homeless shelters.
	Basis for Relative Priority	Through experience supporting public service programs and through dialogue with community residents and service providers, the need for a wide variety of services is clear.
8	Priority Need Name	Planning and Administration
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth 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	Northside 2027

	Associated Goals	Planning and Administration
	Description	Efficient and compliant planning and administration of the CDBG and HOME programs.
	Basis for Relative Priority	Program planning and administration are necessary to address all other needs.
9	Priority Need Name	Housing (NS)
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents
	Geographic Areas Affected	Northside 2027
	Associated Goals	Preserve Owner-Occupied Housing Address Impediments to Fair Housing Choice Planning and Administration Support Homeowners and Renters (NS) Enhance Quality of Life for All Residents (NS) Expand the Availability of Services (NS) Build Community Cohesion (NS)
	Description	The major concerns of Northside residents include the decline in housing stock quality, preservation of affordability, and the conversion of single-family homes into multi-family apartments managed by absentee landlords. Residents have expressed a desire to build a culture of neighborliness and support in helping each other maintain and improve homes. Because there are relatively low levels of vacant land, abandoned buildings, or seriously blighted houses, the overarching goal of this plan's housing strategies is to preserve and improve the quality of existing housing stock. More information on this Priority Need can be found on Page 28 of the Northside 2027 Plan.

	Basis for Relative Priority	Housing was identified as a priority goal in the Needs Assessment and Market Analysis sections.
10	Priority Need Name	Local Economy (NS)
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents
	Geographic Areas Affected	Northside 2027
	Associated Goals	Create and Preserve Local Jobs Planning and Administration Support Existing Businesses and Attract New Ones (NS) Enhance Quality of Life for All Residents (NS) Expand the Availability of Services (NS) Build Community Cohesion (NS)
	Description	Economic activity within the neighborhood is generally limited to the two major commercial corridors—Broad and Linden Streets—and to a lesser extent on Union Boulevard. The neighborhood is conveniently located to nearby job centers, including local colleges and universities and business parks in surrounding suburban areas. More information on this Priority Need can be found on Page 29 of the Northside 2027 Plan.
	Basis for Relative Priority	Economic Development was identified as a priority goal in the Needs Assessment and Market Analysis sections.
	Priority Need Name	Transportation & Streetscape (NS)
	Priority Level	High

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly
	Geographic Areas Affected	Northside 2027
	Associated Goals	Planning and Administration Safety and Mobility for All Modes of Transportation Enhance and Beautify the Public Realm (NS) Physical Improvements to Broad Street Corridor (NS) Physical Improvements to Linden Street Corridor (N) Enhance Quality of Life for All Residents (NS) Expand the Availability of Services (NS)
	Description	Although the Northside is a walkable neighborhood with short, regular blocks and numerous assets within a short distance, several factors contribute to a lack of pedestrian safety. More information on this Priority Need can be found on page 30 of the Northside 2027 Plan.
	Basis for Relative Priority	Transportation and Streetscape Improvements were identified as priority goals in the Market Analysis section.

Narrative (Optional)

Bethlehem intends to make full use of the flexibility inherent in the CDBG program to address the variety of needs identified throughout the community. Additionally, CDBG efforts will be coordinated with the housing support available through the HOME program. Starting with the 2025 Annual Action Plan that is part of this Consolidated Plan and continuing with the four Action Plans to follow in subsequent years, Bethlehem will identify specific goals to be met each year and the specific activities that will be supported to achieve those goals.

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)	The City's TBRA Program is administered by New Bethany with the aim of homelessness prevention for LMI renters. Program participants are eligible to receive up to \$4,500 for rental or utility costs incurred under a fully executed written lease agreement. Market conditions with the potential to impact on the TBRA Program include economic instability (such as a high rate of unemployment) and a rising cost of rent and utilities.
TBRA for Non-Homeless Special Needs	The local housing market provides an inadequate supply of rental housing affordable and suitable for special needs populations, particularly the elderly and persons with disabilities and/or substance abuse issues. Generally, special needs households are more likely to have very low incomes and experience associated housing problems, and the cost of appropriate housing and supportive services can be prohibitive. For instance, the City's "Opening Doors: Strategies to Build Housing Stability in Bethlehem" housing report and plan shows that approximately 37 percent of elderly renter households are extremely cost burdened.
New Unit Production	Market conditions influencing the rate and pace of new unit production in the City of Bethlehem include housing costs, mortgage rates, capacity of Community Housing Development Organizations (CHDOs) and additional developers, availability of vacant land, and demand for homebuyer and rental units. In addition, the cost of materials influences the rate of new unit production. As prices increase, like they did during the COVID-19 pandemic, constructing new units is met with additional funding challenges.
Rehabilitation	Cost of rehabilitation and associated expenses, program waiting list, and contractor availability and performance.
Acquisition, including preservation	As the City of Bethlehem is largely built out, acquisition leading to rehabilitation may be an effective method of increasing and preserving the housing stock. As with new unit production, market conditions include housing costs, mortgage rates, capacity of Community Housing Development Organizations (CHDOs) and additional developers, availability of vacant land, and demand for homebuyer and rental units.

Table 49 – Influence of Market Conditions

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

Introduction

As an entitlement jurisdiction, the City of Bethlehem receives both Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds from HUD. Based on PY2025-26 allocations, the City anticipates receiving \$1,418,306 in CDBG, \$327,704 in CDBG rollover funds, and \$417,183.96 in HOME funds through the 2025-2029 ConPlan period. In addition to HUD funds, the City pursues a wide variety of other resources to address community needs. All potential funding sources—state, federal, and private—are investigated and pursued as appropriate.

The City will expend at least 70% of its CDBG funds over a three-year period on activities that benefit low-to-moderate income persons in accordance with 24 CFR 570.200 (a) (3).

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,418,306	0	327,704	1,746,010	5,673,224	Estimated at four times the Year 1 Allocation

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	417,184	0	0	417,184	1,668,736	Estimated at four times the Year 1 Allocation

Table 50 - 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

The City provides only a portion of the cost of activities including affordable housing, public facilities/public infrastructure, and public services. CDBG funds for public services activities are matched with numerous state funding sources and local donations. Most public facilities and public infrastructure projects are primarily funded through state grants and City bonds with CDBG acting as a local match or providing for a funding gap.

With respect to affordable housing, HOME funds require a 25 percent match from other sources. The City continues to look for match credit opportunities from tax credit funded affordable housing projects and other City projects eligible for match. This strategy allows City to consider eligible state, local and private funding for matching requirements.

All money spent on HOME activity beyond the necessary match will be recorded by the City and submitted to HUD as a component of the Consolidated Annual Performance and Evaluation Report (CAPER) annually.

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

City parks and streets being improved are the only publicly owned land or property located within the jurisdiction that is currently anticipated to be used to address the needs identified in the plan.

Discussion

While available resources are insufficient to meet all needs, careful monitoring, diligent leveraging, and ongoing coordination helps the City of Bethlehem ensure that its residents receive the most benefit from the CDBG and HOME funding received from HUD. The City continuously seeks additional funding sources as well.

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
City of Bethlehem Department of Community and Economic Development	Government	Economic Development Non-homeless special needs Planning neighborhood improvements public facilities public services	Jurisdiction
Bethlehem Housing Authority	Government	Homelessness Public Housing Rental	Jurisdiction
Northampton County Department of Human Services	Government	Homelessness Non-homeless special needs public services	Region
Lehigh County Department of Human Services	Government	Homelessness Non-homeless special needs public services	Region

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City of Bethlehem will implement the Consolidated Plan through the combined efforts of the Department of Community and Economic Development (DCED), participating City Departments, the Division of Economic Development, the Bureau of Planning, the Bureau of Code Enforcement, the Bethlehem Redevelopment Authority (BRA), the Bethlehem Housing Authority and non-profit, and for-profit organizations.

The City of Bethlehem is the facilitator for the goals and activities established in the 2025-2029 ConPlan. As the local unit of government, the City is empowered to apply for and administer CDBG funds, HOME funds, and other grants. Bethlehem will also support other activities through providing certifications of consistency with the ConPlan. The following provides the City's institutional structure for administration of its entitlement program. The City does not foresee any changes to this structure in the coming program year.

The Director of DCED oversees the administration of all CDBG and HOME programs. The Department

also applies for and administers other funding sources, ensuring all resources are highly integrated and administered efficiently. The Department is responsible for:

- Program management and oversight
- Inter-department/agency coordination
- Subrecipient contract administration and monitoring
- Program evaluation
- Report preparation and submission
- Public education and participation
- Special project development
- Consolidated Plan and Annual Action Plan preparation, monitoring, and evaluation
- Housing programs
- Economic development programs and initiatives

The daily oversight of activities for all programs and initiatives comes under the management of the Housing and Community Development Planner. In addition to community development and housing support, City staff provides assistance to subrecipients of grants and loans. The subrecipient grants and loans include, but are not limited to, Community Development Block Grants (CDBG), HOME Investment Partnership Program funds, Pennsylvania Department of Community and Economic Development funds, and Pennsylvania Housing Finance Authority (PHFA) loans, among others.

A major gap in the institutional delivery system continues to be that resources and staff are below levels needed to optimally operate programs. Coordination through the below listed organizations ensures that overlap of missions is minimized and facilitates more efficient use of resources. Opportunities for networking in support of improving services, efficiency, and to eliminate gaps are provided through the coordination efforts described in other sections of the ConPlan.

Additionally, the examination of the gaps in the service delivery system is an ongoing effort by the Lehigh and Northampton County Departments of Human Services and the Lehigh Valley Regional Homeless Advisory Board (LV RHAB), the three Housing Authorities operating within the Lehigh Valley, and the Affordable Housing Trust Fund Advisory Committee. The Housing Authority and the LV RHAB Continuum of Care (CoC) prepare multi-year plans that identify the needs, goals, and objectives for the particular planning period. These agencies will continue to evaluate the services needed and determine whether it is appropriate to seek CDBG or HOME funding from the City of Bethlehem and the Counties of Lehigh and Northampton to meet some of these needs. Though these entities work well together, there are opportunities for improved coordination and communication. All agencies involved in these efforts continue to seek new ways to better serve their target populations and the general public.

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X	X	

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

Table 52 - 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)

Public Agencies:

Four public agencies provide a major portion of housing assistance that takes place in the City. These agencies include the Bethlehem Housing Authority (BHA), the Lehigh County Department of Human Services, the Northampton County Department of Human Services, and the Lehigh Valley Regional Homeless Advisory Board (LV RHAB) Continuum of Care (CoC). The BHA provides public housing, primarily to extremely low-income households, including those who are elderly, disabled, and families. In addition, the BHA also provides rental subsidies through the Housing Choice Voucher (HCV Program). Coordination of the HCV Program occurs between the BHA and the Lehigh and Northampton County's Departments of Human Services.

The County Departments of Human Services additionally coordinate much of the City's emergency assistance, including financial assistance for individuals and households who are at-risk of becoming homeless. This is done through the Northampton County Assistance Office's Emergency Shelter Allowance and the Low Income Home Energy Assistance Program (LIHEAP) which provides cash grants to help households with their heating bills. In addition, the LV RHAB coordinates emergency shelter and

supportive housing services. The Lehigh County and Northampton County Departments of Human Services partner with nonprofit agencies to provide additional housing services, case management, and more such as job training and education.

Nonprofit Organizations:

Nonprofit agencies have played a crucial role in the provision of emergency shelter and supportive services in the City. Agencies such as the Community Action Committee of the Lehigh Valley, New Bethany, Turning Point of the Lehigh Valley, Victory House, YMCA, Valley Youth House, Bethlehem Emergency Shelter, and Trinity Lutheran Church provide emergency shelter and transitional housing to Bethlehem community members. Additional services including mortgage assistance, rental assistance, the Community Action Committee of the Lehigh Valley, and Neighborhood Housing Services of the Lehigh Valley provide utilities assistance, counseling/advocacy, and legal assistance.

Several community organizations and Community Housing Development Organizations (CHDOs) contribute expertise in the management of programs and activities, including Alliance for Building Communities, New Bethany, Moravian House, Housing Opportunity Movement, Inc., and Habitat for Humanity.

A variety of supportive services including case management, life skills, substance abuse assistance, mental health counseling, healthcare, HIV/AIDS services, education, employment training, childcare, transportation, and more and provided by: AIDSNET, ARC of Lehigh & Northampton Counties, Bethlehem Area Vocational-Technical School, Career Link (WIB), Community Action Committee of Lehigh Valley, Council of Spanish Speaking Organizations of Lehigh Valley, Head Start of the Lehigh Valley, LANTA METRO, LANTA METRO PLUS, New Bethany, Northampton Co. Mental Health, Mental Retardation, Drug & Alcohol, Lehigh County Department of Human Services, Step By Step, Inc., Turning Point of Lehigh Valley, VIA, Work/Life Center (Northampton Community College).

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

As detailed above, the City's service delivery system involves a coordinated effort across several agencies. The strength of the service delivery system involves concerted collaborative effort that is exercised throughout the jurisdiction and service area between various public, nonprofit, and private agencies. Emergency housing providers and service providers meet regularly through the Continuum of Care (CoC) to coordinate services and needs. Most facility providers and service providers in the City, both public and private, are members of the Lehigh Valley Regional Homeless Advisory Board (LV RHAB) as well, providing a network for service delivery.

The primary gap in the City's service delivery system includes a need for more financial resources. Housing and community development issues are complex and often require various funding sources to effectively address and solve.

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

Coordination efforts across the City's various service providers, including in the nonprofit, public, and private sectors, allows for the effective pooling of funds and resources. The City's involvement in the creation of various housing and community development plans, such as the Strategic Plan to Address Homelessness and the "Opening Doors: Strategies to Build Housing Stability in Bethlehem" Housing Plan also aids in aligning goals across various agencies.

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	Create and Preserve Affordable Rental Housing	2025	2029	Affordable Housing	City of Bethlehem	Improve the quality of existing housing	HOME: \$500,000	Rental units constructed: 200 Household Housing Unit Rental units rehabilitated: 40 Household Housing Unit
2	Preserve Owner-Occupied Housing	2025	2029	Affordable Housing	City of Bethlehem	Improve the quality of existing housing Foster Strong, Vibrant Neighborhoods Housing (NS)	CDBG: \$827,704 HOME: \$500,000	Homeowner Housing Rehabilitated: 30 Household Housing Unit
3	Enhance Homeownership Opportunities	2025	2029	Affordable Housing	City of Bethlehem	Increase the rate of homeownership	HOME: \$477,328	Direct Financial Assistance to Homebuyers: 20 Households Assisted
4	Address Impediments to Fair Housing Choice	2025	2029	Affordable Housing Public Housing Homeless	City of Bethlehem Northside 2027	Improve the quality of existing housing Increase the rate of homeownership Foster Strong, Vibrant Neighborhoods Housing (NS)	CDBG: \$120,000	Public service activities other than Low/Moderate Income Housing Benefit: 350 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Support Homeless Housing and Services	2025	2029	Homeless	City of Bethlehem Northside 2027	Foster Strong, Vibrant Neighborhoods Enhance the Availability of Community Services	CDBG: \$319,119 HOME: \$400,000	Public service activities for Low/Moderate Income Housing Benefit: 3000 Households Assisted
6	Support High Quality Public Services	2025	2029	Non-Housing Community Development	City of Bethlehem Northside 2027	Enhance the Availability of Community Services	CDBG: \$544,611	Public service activities for Low/Moderate Income Housing Benefit: 19000 Households Assisted
7	Improve Public Facilities and Infrastructure	2025	2029	Non-Housing Community Development	City of Bethlehem Northside 2027	Provide quality infrastructure and community facil Enhance public safety	CDBG: \$2,739,495	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 100000 Persons Assisted
8	Create and Preserve Local Jobs	2025	2029	Non-Housing Community Development	City of Bethlehem	Support the Growth of the Local Economy Local Economy (NS)	CDBG: \$1,000,000	Businesses assisted: 15 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Planning and Administration	2025	2029	PLANNING AND ADMIN	City of Bethlehem Northside 2027	Improve the quality of existing housing Increase the rate of homeownership Provide quality infrastructure and community facil Enhance public safety Support the Growth of the Local Economy Foster Strong, Vibrant Neighborhoods Enhance the Availability of Community Services Planning and Administration Housing (NS) Local Economy (NS) Transportation & Streetscape (NS)	CDBG: \$1,418,306 HOME: \$208,592	Other: 1 Other
10	Safety and Mobility for All Modes of Transportatio	2025	2029	Non-Housing Community Development	City of Bethlehem Northside 2027	Provide quality infrastructure and community facil Transportation & Streetscape (NS)	CDBG: \$50,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	Enhance and Beautify the Public Realm (NS)	2025	2029	Non-Housing Community Development	City of Bethlehem Northside 2027	Provide quality infrastructure and community facil Foster Strong, Vibrant Neighborhoods Transportation & Streetscape (NS)	CDBG: \$50,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted
12	Support Existing Businesses and Attract New Ones (2025	2029	Non-Housing Community Development	City of Bethlehem Northside 2027	Support the Growth of the Local Economy Local Economy (NS)	CDBG: \$50,000	Businesses assisted: 15 Businesses Assisted
13	Physical Improvements to Broad Street Corridor (NS	2025	2029	Non-Housing Community Development	City of Bethlehem Northside 2027	Provide quality infrastructure and community facil Transportation & Streetscape (NS)	CDBG: \$50,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted
14	Physical Improvements to Linden Street Corridor (N	2025	2029	Non-Housing Community Development	City of Bethlehem Northside 2027	Provide quality infrastructure and community facil Transportation & Streetscape (NS)	CDBG: \$50,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted
15	Support Homeowners and Renters (NS)	2025	2029	Affordable Housing	City of Bethlehem Northside 2027	Improve the quality of existing housing Housing (NS)	CDBG: \$50,000	Public service activities for Low/Moderate Income Housing Benefit: 100 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
16	Enhance Quality of Life for All Residents (NS)	2025	2029	Non-Housing Community Development	City of Bethlehem Northside 2027	Enhance public safety Support the Growth of the Local Economy Foster Strong, Vibrant Neighborhoods Enhance the Availability of Community Services Housing (NS) Local Economy (NS) Transportation & Streetscape (NS)	CDBG: \$50,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 30000 Persons Assisted
17	Expand the Availability of Services (NS)	2025	2029	Non-Housing Community Development	City of Bethlehem Northside 2027	Foster Strong, Vibrant Neighborhoods Enhance the Availability of Community Services Housing (NS) Local Economy (NS) Transportation & Streetscape (NS)	CDBG: \$50,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 19000 Persons Assisted
18	Build Community Cohesion (NS)	2025	2029	Non-Housing Community Development	City of Bethlehem Northside 2027	Housing (NS) Local Economy (NS)	CDBG: \$50,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 19000 Households Assisted

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	Create and Preserve Affordable Rental Housing
	Goal Description	The City will increase the supply of affordable rental housing for low-income seniors and other low-income households, especially extremely low- and very low-income households. This will be done by working with nonprofit developers to create new assisted rental housing for seniors and special needs households, pursuing additional resources for affordable housing, and working with the Bethlehem Housing Authority (BHA) to increase the number of Housing Choice Vouchers (HCVs) available to residents. Further, the City proposes to preserve the existing supply of affordable rental units for seniors and other low-income households through a variety of efforts. These include evaluating units and, if necessary, strengthening the City's rental registration and inspection program to guarantee that all rental units are up-to-code. In addition, allocating CDBG, HOME, or other financial assistance to nonprofit owners of affordable housing can help preserve the currently affordable housing stock. The City will continue the registration and inspection program of all rental units for Code compliance.
2	Goal Name	Preserve Owner-Occupied Housing
	Goal Description	The City will preserve and improve the condition of homes occupied by low-income households through the continuation of the Housing Rehabilitation Assistance Program. The Office of Housing and Community Development will re-evaluate the City's Housing Rehabilitation Policies and Procedures Manual, including all forms, legal documents, and marketing materials, and make changes where necessary and as appropriate to provide the best program possible. In addition, the City will continue to distribute lead-based paint (LBP) educational materials to residents and will continue to perform LBP remediation/abatement as part of the Housing Rehabilitation Program.
3	Goal Name	Enhance Homeownership Opportunities
	Goal Description	The City will increase homeownership opportunities for low-income households through the Homeownership Outreach Program (HOOP) and through the continued support of HUD certified nonprofit housing counseling agencies.

4	Goal Name	Address Impediments to Fair Housing Choice
	Goal Description	The City aims to increase resident/community member understanding and compliance with federal and state fair housing laws through workshops and awareness campaigns.
5	Goal Name	Support Homeless Housing and Services
	Goal Description	The City will provide support to homeless service providers and homeless housing providers in coordination with the Lehigh Valley Regional Homeless Advisory Board (LV RHAB) and the Eastern Pennsylvania Continuum of Care (CoC).
6	Goal Name	Support High Quality Public Services
	Goal Description	The City will support public and social services that affect the low- and moderate-income residents of Bethlehem, as well as those with special needs. The City will continue to provide assistance to nonprofit and quasi-public facilities that provide services to low-income populations. Additionally, the City will continue to support public safety services and services to seniors, youth, and persons with disabilities.
7	Goal Name	Improve Public Facilities and Infrastructure
	Goal Description	The City will continue to fund improvements to public facilities and infrastructure in low-income neighborhoods or that serve low-income clientele. Improvements will include sewer, water, and right-of-way reconstruction, activities that bring public facilities into compliance with ADA standards, acquisition of firefighting equipment and vehicles for fire stations with low-income service areas, and improvement of parks and playgrounds serving low-income neighborhoods.
8	Goal Name	Create and Preserve Local Jobs
	Goal Description	The City will focus on the creation and preservation of local jobs by providing economic assistance to local businesses employing low- to moderate-income workers in the form of grants and loans.
9	Goal Name	Planning and Administration
	Goal Description	General planning and administration of CDBG and HOME programs per HUD regulations. This includes planning, record-keeping, reporting, and overall grant management.

10	Goal Name	Safety and Mobility for All Modes of Transportation
	Goal Description	<p>Improve safety and mobility for all modes of transportation by providing high quality streetscapes and neighborhood amenities.</p> <p>The Northside has an advantage in that it is laid out as a dense and walkable urban neighborhood. However, fast speeds on major roads and other shifts toward auto-oriented lifestyles have made it less safe for walking or biking pedestrians. This is especially challenging for school children who walk to and from school each day. In addition, the declining quality of the neighborhood's streetscapes and public realm make it a less welcoming and attractive place to walk around. More information about this goal can be found in the Northside 2027 Plan.</p>
11	Goal Name	Enhance and Beautify the Public Realm (NS)
	Goal Description	<p>Enhance and beautify the public realm to create a sense of place.</p> <p>More information about this goal can be found in the Northside 2027 Plan.</p>
12	Goal Name	Support Existing Businesses and Attract New Ones (
	Goal Description	
13	Goal Name	Physical Improvements to Broad Street Corridor (NS)
	Goal Description	
14	Goal Name	Physical Improvements to Linden Street Corridor (N
	Goal Description	<p>Implement physical improvements to the Linden Street Corridor.</p> <p>More information about this goal can be found in the Northside 2027 Plan.</p>
15	Goal Name	Support Homeowners and Renters (NS)
	Goal Description	<p>Support homeowners and renters through incentives, resources, and enforcement.</p> <p>More information about this goal can be found in the Northside 2027 Plan.</p>

16	Goal Name	Enhance Quality of Life for All Residents (NS)
	Goal Description	Enhance the quality of life for all residents. More information about this goal can be found in the Northside 2027 Plan.
17	Goal Name	Expand the Availability of Services (NS)
	Goal Description	
18	Goal Name	Build Community Cohesion (NS)
	Goal Description	

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

The City of Bethlehem expects to provide new affordability housing opportunities with HOME funds for the following income levels during this ConPlan:

- Extremely Low-Income: The City's regular investment in the rehabilitation of rental buildings like the Moravian House and YMCA are expected to benefit approximately 100 households earning less than 30 percent of AMI.â€”
- Very Low-Income: Approximately ten families earning between 30 percent and 50 percent of AMI by family sizeâ€”are expected to be provided with affordable housing through a combination of first-time homebuyer activities and housing development.
- Low-Income:â€”Approximately ten families earning between 50 percent and 80 percent of AMI by family sizeâ€”are expected to be provided with affordable housing through a combination of first-time homebuyer activities and housing development.

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)

N/A: Not required as there is no Voluntary Compliance Agreement in the City of Bethlehem or for the Bethlehem Housing Authority (BHA).

Activities to Increase Resident Involvements

The Bethlehem Housing Authority (BHA) has several programs established to increase resident involvements. First, the BHA's Family Self-Sufficiency (FSS) Program is designed to assist residents of public housing and voucher holders to achieve economic independence. The FSS Program helps remove obstacles to success by improving life skills and by providing job training, career development, and educational opportunities. Residents wishing to participate must enter into a five-year contract with the BHA to establish goals and work toward economic self-sufficiency. Individualized training and services plans are created for each household. In addition, when a family chooses to participate in the FSS Program, the BHA agrees to establish an escrow savings account during the contract period for the family. As income increases, along with rent, credit is provided through the savings account. Upon successful completion of the FSS Program, the family is entitled to the money accumulated in their account. Participants further benefit from case management services.

In addition, the BHA recognizes the importance of recreational and entertainment activities. As such, the agency provides opportunities for recreation and entertainment to public housing residents. This includes dedicated events for children and adults with the purpose of keeping residents active in their communities.

Under the Quality Housing and Work and Responsibility Act of 1998 (QHWRA), able-bodied public housing residents are required to participate in community service. However, if an individual is participating in the FSS Program at a rate of eight hours per month, these hours can count toward their community service time. Community service activities are pre-approved by BHA staff and are not required of seniors, persons with disabilities, children under the age of 18, caregivers, and those who are employed at least 30 hours per week.

The BHA also encourages participation in the Resident Advisory Boards (RAB), which is made up of a representative from each building/development. Board members meet at least three times per year to assist the BHA with the preparation and updating of their Five Year and Annual Plans.

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

No

Plan to remove the 'troubled' designation

N/A: Not applicable. The PHA is not designated as 'troubled.'

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

Barriers to Affordable Housing

The City of Bethlehem on an ongoing basis examines the City's public policies with regard to the costs of housing to the incentives to develop, maintain or improve affordable housing in the City. The City's Zoning Ordinance provides for a variety of housing types and various densities and varying lot sizes. This variety reduces the potential for barriers to affordable housing as a result of regulatory policies. In addition, the City's Zoning Ordinance allows for emergency shelters, transitional housing, permanent supportive housing, and group homes for people with disabilities. Bethlehem does not impose impact fees for development and permit fees are reasonable. Additionally, the City's Zoning Ordinance has a chapter on Workforce Housing Incentives to allow greater density when incorporating affordable housing units.

The City has historically allocated CDBG and HOME resources for direct housing assistance, including its Housing Rehabilitation Assistance Program for lower income homeowners, the Down payment, and Closing Cost Assistance Program to assist first time buyers, rehabilitation assistance to non-profit organizations for creation of transitional housing and affordable rental and for sale housing.

The City continues to fund the Lehigh Valley Center for Independent Living to assist disabled persons obtain and maintain housing. Funds have also been used to assist housing related initiatives including the Community Action Committee of the Lehigh Valley and Neighborhood Housing Services of the Lehigh Valley, both of which are HUD certified housing counselors.

Bethlehem implements Lead Safe practices in carrying out rehab activities whenever possible using funds from the CDBG and HOME Programs and maintains a pool of qualified contractors to address lead-based paint hazards effectively and efficiently.

The City's Health Bureau receives funding from the state's Lead Hazard Control Program to control lead-based paint hazards in target housing in high-risk areas. The City performs eligibility determinations on potentially eligible units, prioritizing units and performing lead-based paint combined inspection/risk assessments, lead-based paint hazard control related procedures and clearance procedures on those units.

The City's Code Enforcement Office works to see that codes are properly enforced and encourages affordable housing developers to introduce innovative/cost effective construction techniques and act as liaison between City and developers.

The City will use the Zoning Ordinance to work with private developers to utilize a density bonus to foster affordable housing development within the City. The City will advocate for other regulatory options to increase affordable housing.

In November 2023, the City released Opening Doors: Strategies to Building Housing Stability in Bethlehem, a comprehensive housing strategy. The document was updated in June 2024. The document includes a thorough examination of the housing needs in Bethlehem, existing housing conditions, housing challenges, and feedback from community engagement. Using this information, a housing plan is presented with five strategies and ten projects. Two of these projects were to update City zoning to encourage neighborhood compatible infill affordable housing development and pilot an accessory dwelling unit program.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The City's 2023 Opening Doors: Strategies to Build Housing Stability in Bethlehem proposed several new housing strategies. These include:

- Strategy 1: Update Zoning and Land Use to Encourage a Variety of Housing Types and Infill Development
 - Project 1: Update City Zoning to encourage neighborhood compatible infill affordable housing development
 - Project 2: Pilot an Accessory Dwelling Unit (ADU) Program
- Strategy 2: Offer Incentives to Create and Preserve Affordable Housing
 - Project 3: Create an Affordable Rental Housing Construction Program
 - Project 4: Create a Landlord Incentive Program for Section 8 vouchers
- Strategy 3: Foster Partnerships with the Bethlehem Housing Authority (BHA) and Local Institutions to Support New Housing and Community Investment
 - Project 5: Create and implement a Choice Neighborhoods Transformation Plan
 - Project 6: Gain Site Control of Vacant Land and Buildings to Develop Affordable Housing
- Strategy 4: Protect Tenants At-Risk of Displacement and Increase the Supply of Deeply Affordable Rental Units
 - Project 7: Implement Eviction Prevention and Rental Assistance Program
 - Project 8: Increase the Supply of Deeply Affordable Units
- Strategy 5: Advocate For State-Enabling Affordable Housing Policies, Programs, and Regional Housing Planning
 - Project 9: Engage in State-Level Advocacy and Lobbying to Enhance Resources for Affordable Housing Development
 - Project 10: Support and Promote Regional Housing Planning

In 2023, the City of Bethlehem, in partnership with the Bethlehem Housing Authority (BHA), was awarded a HUD Choice Neighborhoods (CN) Planning Grant. This Program supports the revitalization of distressed public housing, and the project will focus on the Pembroke Neighborhood. The City and BHA are currently working with local residents and a variety of community members and stakeholders to create a Pembroke CN Plan. The CN Plan is centered on the redevelopment of the BHA's Pembroke Village property, which includes 196 units of low-income housing, and will seek replace 100 percent of units within the neighborhood, or in other areas of opportunity for new mixed-income developments. Further, the City's 2025-2029 Analysis of Impediments (AI) to Fair Housing Choice identified barriers to housing choice and developed strategies to provide fair housing opportunities. In terms of overcoming barriers to affordable housing, these strategies include data that was gathered through surveys, community forums, stakeholder engagement, and comprehensive data analysis from various sources to ensure a thorough understanding of the issues at hand. Major barriers identified include housing discrimination; lending practices; the age, size, quality, and availability of the City's housing stock; accessibility of housing; increasing number of unsheltered homeless persons; increasing cost of housing; restrictive zoning; as well as a significant population of City residents having the limited English proficiency or being a racial/ethnic minority.

SP-60 Homelessness Strategy – 91.215(d)

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

The Lehigh Valley Regional Homeless Advisory Board (LV RHAB) is the consortium of individuals, agencies, and other stakeholders that direct and coordinate community-wide efforts toward ending chronic homelessness, preventing homelessness, and addressing housing insecurity in all communities in Lehigh and Northampton Counties.

The LV RHAB is one of several agencies and organizations involved in planning and implementing homeless programs and activities in the 33-county area under the Pennsylvania Eastern Continuum of Care Collaborative (PA Eastern CoC). The PA Eastern CoC has a primary relationship with the PA Department of Community and Economic Development (DCED), which has responsibilities to the State Legislature for planning and implementing programs statewide. This includes the management of statewide homeless and housing programs including ESG, the completion of the state's Consolidated Plan, and other statewide planning efforts.

In the Lehigh Valley Regional Homeless Advisory Board (LV RHAB) Statement of Purpose, adopted September 9, 2014, chronic homeless (for anyone in our community) is no longer an issue within the Lehigh Valley. Housing insecurity and homelessness prevention are a community priority, Homelessness, if it occurs, is a short-term condition, lasting no more than 14 days. LV RHAB functions include:

- Combining evidence-based solutions and recommendations from national partners (USICH, NAEH, HUD, VA, for example) with local community knowledge to end chronic and veteran homelessness, prevent the occurrence of homelessness and respond quickly should an event occur
- Fostering collaboration and interdependency between homeless service providers and mainstream and community resources
- Conducting regular homeless enumeration, identifying unmet needs and gaps in services
- Leveraging federal, state, and community resources in cost effective ways, eliminating duplication of efforts.

It is the responsibility of each Regional Homeless Advisory Board (RHAB) to identify regional and local homeless issues; implement the regional Continuum of Care plan; and monitor, review and rank projects funded through the regional Continuum of Care plan.

Addressing the emergency and transitional housing needs of homeless persons

While Bethlehem does not receive ESG funding, the City is dedicated to addressing the emergency shelter and transitional needs of homeless persons by implementing a comprehensive approach that prioritizes both immediate assistance and long-term solutions. Bethlehem collaborates closely with local homeless service providers, shelters, and transitional housing facilities to ensure that individuals and families experiencing homelessness have access to safe and supportive environments where they can receive temporary shelter, necessities, and wraparound services. Additionally, Bethlehem allocates resources to enhance the capacity and quality of emergency shelters and transitional housing programs, ensuring that they are equipped to meet the diverse needs of homeless individuals while also providing

pathways to permanent housing through rapid rehousing initiatives, case management, and supportive services. By prioritizing emergency shelter and transitional housing as integral components of its homelessness response system, Bethlehem strives to provide compassionate and effective support to those in need while working towards the goal of ending homelessness in the community. The city administration annually works closely with the Bethlehem Emergency Shelter to organize its winter shelter.

In 2023, the City submitted a HOME-ARP allocation plan to HUD allocating funds to acquisition/rehabilitation/development of a non-congregate emergency shelter that will serve qualifying populations. Additionally, through the CoC and County Homeless Assistance Programs, comprehensive and varied programs are available to Bethlehem residents and the region to assist the homeless in making the transition to permanent housing including addressing special needs of persons who are not homeless.

In 2020, an Affordable Housing Task Force was created to help guide future actions needed with development and land use regulation changes.

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.

Treating the homeless population and providing the means and support necessary to make the transition to permanent housing and independent living are all part of the efforts and programs in place in the city through the Lehigh Valley Regional Homeless Advisory Board, Continuum of Care. The institutions and structure to properly address this issue are in place and are described in the homeless inventory section of this Plan.

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

In establishing City priorities, the prevention of homelessness is a key element in these efforts. By funding the City's housing rehabilitation activities with CDBG and HOME funds and provision of housing and referral services for low-income households, the City hopes to prevent the conditions that would precipitate homelessness. Additionally, the City through their entitlement allocations assists Emergency Shelter and Transitional Housing providers to make improvements to their facilities to guarantee long term housing viability.

Based on the Pennsylvania Eastern Continuum of Care Collaborative's Governance Charter and the

Lehigh Valley Regional Homeless Advisory Board's Work Plan and Action Steps, the City of Bethlehem supports the following strategies and objectives to address the issue of homelessness. These are Regional Objectives, Proposed Actions and Goals and are not subdivided specifically for Bethlehem.

Priority 1: Housing Facilities for Homeless and Special Needs Populations

- Create new permanent housing for homeless disabled population
- Create new permanent housing for chronically homeless persons
- Increased percentage of homeless persons moving from transitional housing to permanent housing
- Increased percentage of persons staying in permanent housing over 6 months

Priority 2: Institutional Discharge and Services

- Prevent homelessness among individuals leaving community hospitals
- Prevent homelessness among individuals leaving correctional facilities and increase permanent housing for individuals with a criminal record
- Prevent homelessness among youth exiting the Children and Youth System
- Increase percentage of homeless persons becoming employed
- Ensure that the Continuum of Care has a functional HMIS system
- Expand the capacity of local service providers in rural areas to serve the chronically homeless
- Develop more permanent service-enriched (supportive) housing for homeless families requiring services
- Ensure access to employment and training services for homeless persons

Bethlehem recognizes the Discharge Planning Policy prepared by the PA Eastern CoC. These policies were developed in order to prevent the discharge of persons from medical institutions or other systems of care resulting in homelessness. The Commonwealth of PA has established formal policies regarding discharge of persons from State mental health or corrections facilities. For mental health, there can be no discharge unless all housing, treatment, case management and rehabilitation services are in place. Each State mental hospital has a Service Area Planning Team which is charged with developing a plan for moving individuals from the hospital to the community. Discharge is dependent upon an approved Home Plan.

Regarding foster care, the State of Pennsylvania has established a process to be discharged from the foster care/child welfare system. This includes information on age limits, reason for discharge from the foster care/child welfare system, available programming (instruction in daily living skills, home management, career planning, education and training, job placement and readiness and financial management), juvenile court, legislation, and contact information.

Hospitals (healthcare facilities) in Pennsylvania must have written discharge policies for "appropriate referral and transfer plans that comply with requirements of the Federal Conditions for Participation in Medicare and Medicaid Services."

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

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

The City of Bethlehem operates a Lead and Healthy Homes Program to protect eligible residents from the harms of lead poisoning and other home related health hazards. Low- to moderate-income homeowners and landlords with income-qualifying tenants who have LBP present in their homes are eligible to apply for free testing and remediation assistance. The Lead and Healthy Homes Program provides the opportunity to identify LBP hazards, education, and leave-behind materials to help residents create and maintain a safe environment. The City then works with the Lead Hazard Control Program to provide abatement from such hazards. The Health Bureau and the Community Development Bureau collaborate to conduct lead abatement construction activities for income-eligible homeowners. In addition, any property owner in the City can request a lead inspection for their property. The City assesses a fee for this service to cover the cost of the inspectors' time. Health Bureau and the Community Development Bureau staff further coordinate when elevated blood lead levels are identified.

All applicable projects and activities conducted by the City follow HUD regulations for LBP. The City's Residential Rehabilitation Program provides LBP abatement.

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

According to HUD's American Healthy Homes Survey II (AHHS II), conducted from March 2018 through June 2019, it is estimated that 34.6 million homes in the U.S. have LBP somewhere in the building. These homes account for 29.4 percent of all U.S. housing stock, of which 22.3 million have one or more significant LBP hazard. Units constructed prior to 1978 are of particular concern for LBP poisoning and hazards, as LBP use in residential properties was outlawed in 1978. According to 2016-2020 CHAS data, approximately 80 percent of the City's housing stock was constructed prior to 1980. Children are of most concern with LBP hazards as, according to the U.S. Environmental Protection Agency (EPA), LBP can be found on window frames, walls, the outside of homes, or other surfaces. While LBP in good condition is not always a problem, small pieces of chipped paint or paint dust can be dangerous, especially to young children who typically put objects in their mouths and are more susceptible to lead poisoning. Opening a window coated with LBP, for example, will cause painted surfaces to rub against each other, creating lead dust. 2016-2020 CHAS data shows that five percent of owner-occupied housing and two percent of renter-occupied housing have children present.

The City's Lead and Healthy Homes Program, along with applicable LBP remediation efforts through rehabilitation and HUD-funded projects helps to ensure the safety of LMI households and young children who are especially vulnerable to lead poisoning.

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

Funding for lead abatement is available to income-eligible homeowners through the City of Bethlehem's Housing Rehabilitation Program.¹² In recent years, the City of Bethlehem has annually allocated CDBG

funds to its Housing Rehabilitation Program in anticipation of increased costs for LBP abatement and remediation.⁴² Although abatement is the preferred mechanism to address LBP hazards, due to the extensive costs of lead abatement and the total number of homes that are likely to be contaminated with lead, the Housing Rehabilitation Program will focus on lead hazard reduction, (i.e., interim controls), until the total number of lead contaminated homes has been significantly reduced.

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

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

The City is concerned about the wellbeing of its residents and recognizes the need for citizens to live in sound and sanitary housing, live in safe and decent neighborhoods, and have access to appropriate services and resources. Bethlehem implements various activities and strategies with the goal of reducing the number of poverty-level families in the community. These include:

- Job Creation Initiatives: Encouraging economic development and attracting businesses to create job opportunities for residents.
- Affordable Housing Initiatives: Building or subsidizing affordable housing options for low-income families.
- Social Services Support: Providing access to social services such as food assistance, healthcare, childcare, and transportation.
- Community Partnerships: Collaborating with local organizations and nonprofits to provide additional support and resources to special needs and LMI households.
- Education and Youth Programs: Investing in quality education and after-school programs to support children and youth from LMI households.
- Section 3: The City works to comply with HUD guidance on utilization of firms owned by or employing low-income persons.

In 2021, the City adopted an Affordable Housing LERTA District. This tax incentive program assures either the development of affordable housing units as part of a larger housing development or provides a fee in-lieu of housing production, for future affordable housing initiatives or programs. The creation of affordable housing will hopefully support the creation of more and better jobs for lower-income families in the city. The City Economic Development Bureau uses a variety of funding sources to aid local businesses with the hope that they will grow, retain, and hire LMI workers. The City will continue to look for opportunities to invest in future job-creation activities with an emphasis on the hiring of low-income residents and to pursue economic development in all forms to increase the supply of higher-paying jobs available to city residents.

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

This ConPlan recognizes the importance of jurisdictional goals aimed at reducing poverty for residents. The Needs Assessment and Market Analysis sections of this ConPlan explored data relating to the City's lowest income residents, special needs residents, and their housing/service needs. Actions carried out through this ConPlan are related to the City's overarching goals on economic and community development prosperity as the City allocates federal funds for CDBG and HOME to support poverty-level families. At least 70 percent of CDBG funds must benefit low- to moderate-income households.

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

Grant and program monitoring are key components in the long-term success of the ConPlan's efforts. Through the Department of Community and Economic Development (DCED), the City has developed standards and procedures for ensuring that the recipients of CDBG and HOME funds meet federal regulations and requirements.

DCED oversees the City's housing and community development programs and is responsible for all performance measurement activities. DCED has incorporated HUD's Performance Measurement standards into the process of awarding funds, allocating resources, and obtaining progress and completion reports. The monitoring procedures under this ConPlan will continue to build upon existing monitoring systems used by the City which have proven successful.

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

1. Objectives of the Housing and Community Development Act and the National Affordable Housing Act are met;
2. Program activities are progressing in compliance with the specifications and schedule for each program;
3. Recipients are in compliance with other applicable laws, implementing regulations, etc.; and
4. That the housing rehabilitation program is in conformance with: Section 504 Handicapped Accessibility, Section 106 Historic Preservation, Housing Quality Standards, Lead-Based Paint regulations and Displacement/Relocation regulations.

DCED will review all proposed activities for eligibility with statutory and regulatory requirements, and for meeting identified needs in this ConPlan.

Further, Annual Action Plan activities will be monitored through the use of checklists and forms to facilitate uniform monitoring. Each year, DCED re-examines the forms used to determine what revisions are necessary. Each description of projects and activities will contain the specific performance measures by which the project will be evaluated.

Fiscal monitoring will include review and approval of budgets, compliance with Grant Agreements, approval of vouchers and reviews of fiscal reports and subrecipient audits. The HUD CDBG and HOME Programs are consistently included in the City's Annual Financial Audit.

Monitoring of subrecipients will occur annually through desk-monitoring and on-site monitoring visits, as appropriate. For public facilities and housing projects, site visits will be conducted at least every other year to ensure benefit to low-income residents.

Expected Resources

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

Introduction

As an entitlement jurisdiction, the City of Bethlehem receives both Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds from HUD. Based on PY2025-26 allocations, the City anticipates receiving \$1,418,306 in CDBG, \$327,704 in CDBG rollover funds, and \$417,183.96 in HOME funds through the 2025-2029 ConPlan period. In addition to HUD funds, the City pursues a wide variety of other resources to address community needs. All potential funding sources—state, federal, and private—are investigated and pursued as appropriate.

The City will expend at least 70% of its CDBG funds over a three-year period on activities that benefit low-to-moderate income persons in accordance with 24 CFE 570.200 (a) (3).

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,418,306.00	0.00	327,704.00	1,746,010.00	5,673,224.00	Estimated at four times the Year 1 Allocation

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	417,183.96	0.00	0.00	417,183.96	1,668,735.84	Estimated at four times the Year 1 Allocation

Table 54 - 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

The City provides only a portion of the cost of activities including affordable housing, public facilities/public infrastructure, and public services. CDBG funds for public services activities are matched with numerous state funding sources and local donations. Most public facilities and public infrastructure projects are primarily funded through state grants and City bonds with CDBG acting as a local match or providing for a funding gap.

With respect to affordable housing, HOME funds require a 25 percent match from other sources. The City continues to look for match credit opportunities from tax credit funded affordable housing projects and other City projects eligible for match. This strategy allows City to consider eligible state, local and private funding for matching requirements.

All money spent on HOME activity beyond the necessary match will be recorded by the City and submitted to HUD as a component of the Consolidated Annual Performance and Evaluation Report (CAPER) annually.

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

City parks and streets being improved are the only publicly owned land or property located within the jurisdiction that is currently anticipated to be used to address the needs identified in the plan.

Discussion

While available resources are insufficient to meet all needs, careful monitoring, diligent leveraging, and ongoing coordination helps the City of Bethlehem ensure that its residents receive the most benefit from the CDBG and HOME funding received from HUD. The City continuously seeks additional funding sources as well.

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	Preserve Owner-Occupied Housing	2025	2029	Affordable Housing	City of Bethlehem	Improve the quality of existing housing Foster Strong, Vibrant Neighborhoods Housing (NS)	CDBG: \$666,158.00	Homeowner Housing Rehabilitated: 34 Household Housing Unit Other: 1 Other
2	Enhance Homeownership Opportunities	2025	2029	Affordable Housing	City of Bethlehem	Increase the rate of homeownership Housing (NS)	CDBG: \$30,641.00 HOME: \$374,465.95	Direct Financial Assistance to Homebuyers: 4 Households Assisted Other: 7 Other
3	Address Impediments to Fair Housing Choice	2025	2029	Affordable Housing Public Housing Homeless	City of Bethlehem	Improve the quality of existing housing Increase the rate of homeownership Foster Strong, Vibrant Neighborhoods Housing (NS)	CDBG: \$15,000.00	Public service activities other than Low/Moderate Income Housing Benefit: 80 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Support Homeless Housing and Services	2025	2029	Homeless	City of Bethlehem	Foster Strong, Vibrant Neighborhoods Enhance the Availability of Community Services	CDBG: \$212,746.00 HOME: \$0.00	Public service activities for Low/Moderate Income Housing Benefit: 625 Households Assisted
5	Support High Quality Public Services	2025	2029	Non-Housing Community Development	City of Bethlehem	Enhance the Availability of Community Services	CDBG: \$108,922.00	Public service activities other than Low/Moderate Income Housing Benefit: 3750 Persons Assisted
6	Improve Public Facilities and Infrastructure	2025	2029	Non-Housing Community Development	City of Bethlehem	Provide quality infrastructure and community facilities Enhance public safety	CDBG: \$428,094.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3825 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 90 Households Assisted
7	Planning and Administration	2025	2029	PLANNING AND ADMIN	City of Bethlehem	Planning and Administration	CDBG: \$283,661.00 HOME: \$41,718.00	Other: 1 Other

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Preserve Owner-Occupied Housing
	Goal Description	
2	Goal Name	Enhance Homeownership Opportunities
	Goal Description	
3	Goal Name	Address Impediments to Fair Housing Choice
	Goal Description	
4	Goal Name	Support Homeless Housing and Services
	Goal Description	
5	Goal Name	Support High Quality Public Services
	Goal Description	
6	Goal Name	Improve Public Facilities and Infrastructure
	Goal Description	
7	Goal Name	Planning and Administration
	Goal Description	

Projects

AP-35 Projects – 91.220(d)

Introduction

Projects geared toward low- and moderate income individuals are vital for the City of Bethlehem when utilizing HUD funding as they directly address pressing housing challenges faced by vulnerable residents. By prioritizing affordable housing initiatives, Bethlehem can ensure that such individuals and families have access to safe, decent, and affordable housing options. These projects not only help prevent homelessness and housing instability but also contribute to the overall well-being and economic stability of the community. Additionally, investing in the housing needs of low- and moderate income residents fosters economic mobility, promotes economic growth, and strengthens the fabric of the community. Through HUD-funded projects, Bethlehem can fulfill its commitment to serving those most in need while creating a more resilient City for all residents. With input from a variety of stakeholders, data from a variety of sources, and with hands-on experience in front-line services to the most vulnerable populations in the City, DCED plans a mix of activities in program year 2025 to address the priority needs. Infrastructure improvements, housing rehab, recreation, and support for public service facilities improvements are just some of the approaches to improving neighborhoods, houses and, most importantly, families in Bethlehem.

Applications for funding are generally made available in the fall of each year on Neighborly. Applications for HOME are accepted on an ongoing basis throughout the year. Application information was made available on the City's website and was directly emailed to public service organizations in the region that have either requested funding during the previous program year and or remain interested in future funding. The City keeps a list of new and interested organizations that are in contact during the year. Applications were reviewed and evaluated by an internal committee based on the quality of the project, the need for the project, project or service duplication, recipient performance history, value of the resources versus the number of residents served, alignment with the City's goals and needs, and other factors. Funding is awarded based on annual allocation award, level of impact, beneficiaries, need for the project, service, or program, and other factors. DCED allocation recommendations are reviewed by both the Mayor and City Council for final approval.

Projects

#	Project Name
1	CADCB Tenant Advocacy Project
2	BES Emergency Shelter Operations
3	Hogar CREA Women's Center
4	CALV - HCP BHAP (Bethlehem Housing Assistance Program)
5	LVCIL PLACE Program

#	Project Name
6	Faith in Action (ShareCARE) Volunteer Caregiving
7	Hispanic Center Lehigh Valley Food Pantry
8	Representative Payee Program (New Bethany)
9	Community Housing Development Organization (CHDO) - Community Action
10	HOME Affordable Housing Project Opportunities
11	North Penn Legal Services
12	Drop-In Center (New Bethany)
13	Community Action Development Bethlehem Southside Exterior Rehabilitation and Weatherization Program
14	Holy Family Manor Fire Protection Improvements
15	CDBG Housing Rehabilitation (City of Bethlehem)
16	CDBG Housing Rehab Program Delivery (City of Bethlehem)
17	Goepp St Improvements
18	4th St Improvements
19	Future Projects TBD
20	CDBG and HOME Program Administration
21	Northside Alive Strategy
22	RDA's Blight Elimination Program

Table 56 – Project Information

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

CDBG and HOME deliberations are based on funding activities that have the greatest benefit to City residents while showing a reasonable likelihood of timely spending without redundancy. The system for establishing the priority for selection of these projects is predicated upon the following general criteria:

- Meeting the statutory and regulatory requirements of the CDBG and HOME Programs
- Meeting the needs of low- and moderate-income residents
- Focusing on low- and moderate-income areas or neighborhoods
- Coordination and leveraging of resources
- Response to expressed needs
- Sustainability and/or long-term impact
- Has the ability to demonstrate measurable progress and success, and
- Addresses identified in-need populations.

AP-38 Project Summary

Project Summary Information

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1	Project Name	CADCB Tenant Advocacy Project
	Target Area	City of Bethlehem Northside 2027
	Goals Supported	Support High Quality Public Services
	Needs Addressed	Enhance the Availability of Community Services
	Funding	CDBG: \$15,000.00
	Description	CDBG funds from the City of Bethlehem will be put toward salary and benefits costs of the Tenant Advocate and Organizer position. Roles and responsibilities of the Tenant Advocate and Organizer include: facilitate community engagement; offer tenant advocacy; mediate tenant-landlord disputes; provide resources and education on tenant rights; and support with rental property issues. This work benefits low-to moderate-income residents throughout the City of Bethlehem.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	100
	Location Description	
2	Project Name	BES Emergency Shelter Operations
	Target Area	City of Bethlehem
	Goals Supported	Support Homeless Housing and Services

	Needs Addressed	Enhance the Availability of Community Services
	Funding	CDBG: \$67,746.00
	Description	BES provides food and shelter to homeless men and women not served by other sheltering organizations during the colder months of the year. From November through April each year, BES provides emergency shelter, a hot dinner, and access to support services and shower facilities. Support services made available to guests include physical health check-ups, physical therapy assistance, vaccines, and testing; mental health assessments and referral for services; connection to permanent and transitional housing; drug and alcohol support; and assistance with PA COMPASS and other services
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	70 persons
	Location Description	
	Planned Activities	BES provides food and shelter to homeless men and women not served by other sheltering organizations during the colder months of the year. From November through April each year, BES provides emergency shelter, a hot dinner, and access to support services and shower facilities. Support services made available to guests include physical health check-ups, physical therapy assistance, vaccines, and testing; mental health assessments and referral for services; connection to permanent and transitional housing; drug and alcohol support; and assistance with PA COMPASS and other services
3	Project Name	Hogar CREA Women's Center
	Target Area	City of Bethlehem
	Goals Supported	Support Homeless Housing and Services
	Needs Addressed	Enhance the Availability of Community Services
	Funding	CDBG: \$20,000.00
	Description	Hogar CREAs inpatient womens treatment facility helps those in need of drug and alcohol recovery services, whether English or Spanish speaking. This is the first bilingual inpatient recovery facility in the area and caters to the needs of this community. Latinos make up 55% of the Lehigh Valley population according to 2020 US census figures

	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	15 persons assisted
	Location Description	1920 E. Market Street, Bethlehem, PA
	Planned Activities	Staffing expenses related to running an inpatient treatment facility for women
4	Project Name	CALV - HCP BHAP (Bethlehem Housing Assistance Program)
	Target Area	City of Bethlehem
	Goals Supported	Support High Quality Public Services
	Needs Addressed	Enhance the Availability of Community Services
	Funding	CDBG: \$25,000.00
	Description	The Bethlehem Homebuyer Assistance Program (BHAP) will assist low-to moderate-income households throughout the City of Bethlehem that are seeking assistance for down payment and closing costs. CDBG funds will be utilized for activity delivery only and HOME funds will be the assistance provided.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	50 persons assisted
	Location Description	1337 E. 5th Street, Bethlehem, PA

	Planned Activities	The Housing Counseling Program (HCP) is a HUD-approved housing counseling program which helps families achieve homeownership and avoid foreclosure. HCP's mission is to provide low- to moderate-income clients with a continuum of coordinated financial counseling services to encourage and assist them to build personal assets, obtain and preserve homeownership, and to develop neighborhood wealth for the benefit of the whole community. Applicant seeks funding to assist the City administer its Bethlehem Homebuyer Assistance Program (BHAP). BHAP participants must participate in HCP's Home Ownership Counseling Program seminar and/or pre-settlement counseling and one-on-one pre-purchase counseling.
5	Project Name	LVCIL PLACE Program
	Target Area	City of Bethlehem
	Goals Supported	Support High Quality Public Services
	Needs Addressed	Enhance the Availability of Community Services
	Funding	CDBG: \$15,000.00
	Description	This program serves low-income residents with disabilities and provide housing counseling services, including supports coordination, intake, and follow along services. Consumers work with Community Support Coordinators to find accessible, affordable housing options. Supports coordination helps consumers access needed services to achieve or maintain their independence and housing stability. Follow along services allow LVCIL to track a consumer's progress and determine whether housing stability has been achieved. Nearly 10% of Bethlehem residents have a disability and on average, are more likely to live in poverty, receive government assistance, work in low-paying jobs, and experience chronic homelessness.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	25
	Location Description	

	Planned Activities	This program serves low-income residents with disabilities and provide housing counseling services, including supports coordination, intake, and follow along services. Consumers work with Community Support Coordinators to find accessible, affordable housing options. Supports coordination helps consumers access needed services to achieve or maintain their independence and housing stability. Follow along services allow LVCIL to track a consumer's progress and determine whether housing stability has been achieved. Nearly 10% of Bethlehem residents have a disability and on average, are more likely to live in poverty, receive government assistance, work in low-paying jobs, and experience chronic homelessness.
6	Project Name	Faith in Action (ShareCARE) Volunteer Caregiving
	Target Area	City of Bethlehem
	Goals Supported	Support High Quality Public Services
	Needs Addressed	Enhance the Availability of Community Services
	Funding	CDBG: \$10,000.00
	Description	ShareCare has approximately 120 volunteers who provide free caregiving to elderly or disabled people. The program currently serves 60-80 residents living in Bethlehem City limits. Most people served are 60 years of age and older, disabled, or low income. ShareCare strives to help older adults and those with disabilities to enjoy a quality of life and remain independent as long as possible by providing caregiving assistance such as transportation to and from appointments, visitation, telephone visitation (Senior Chat) to prevent isolation, Caregiver Canines® program and respite care. Sharecare's unique attribute is older adult volunteers are helping older adults. ShareCare seeks funds to support personnel including program coordinators and an executive director.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	80 persons
	Location Description	321 Wyandotte Street, Bethlehem, PA

	Planned Activities	ShareCare strives to help older adults and those with disabilities to enjoy a quality of life and remain independent as long as possible by providing caregiving assistance such as transportation to and from appointments, light household and yard chores, visitation to prevent isolation, Caregiver Canines program and respite care.
7	Project Name	Hispanic Center Lehigh Valley Food Pantry
	Target Area	City of Bethlehem
	Goals Supported	Support High Quality Public Services
	Needs Addressed	Enhance the Availability of Community Services
	Funding	CDBG: \$20,000.00
	Description	The HCLV Food Pantry works to decrease food insecurity by providing emergency food services to low- to moderate-income individuals residing in Northampton County, with a focus on the HCLV target area of Southside Bethlehem and the Marvine/Pembroke areas. The Food Pantry is available five days a week for appointments. Utilizing a client choice model, clients shop for a three-day supply of food, choosing from fresh fruits, vegetables, meat, and culturally appropriate dry and canned goods, with assistance from staff. The Food Pantry program also provides case management services and referrals to HCLV programs and community partners. Clients that visit the pantry more than three times during the year are referred to HCLVs Social Service Program for comprehensive case management which can help clients obtain employment, stable housing, education or training, and other resources.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	350 households assisted
	Location Description	520 E. 4th Street, Bethlehem, PA
	Planned Activities	The HCLV Food Pantry expects to serve 350 households with emergency food through appointments at the Food Pantry, and successfully refer 15 households who receive emergency food on 3 or more occasions to the HCLV Social Service Program for assistance in establishing self-sufficiency through individualized case management.
	Project Name	Representative Payee Program (New Bethany)

8	Target Area	City of Bethlehem	
	Goals Supported	Support Homeless Housing and Services	
	Needs Addressed	Enhance the Availability of Community Services	
	Funding	CDBG: \$50,000.00	
	Description	New Bethanys Bethlehem Representative Payee Program prevents the trauma of homelessness and sustains self-sufficiency for low-income residents of the City of Bethlehem who lack the cognitive and other resources (whether temporarily or permanently) necessary to successfully manage their finances on their own. The program currently serves over 30 low-income Bethlehem residents who would otherwise almost certainly be homeless and keeps people safe and stably housed while providing case management to help them reach their highest level of self-sufficiency. They utilize the clients Social Security funds to pay essential bills on their behalf to ensure they remain stably housed. To participate in the program the client must agree to receive appropriate services, including budget development, savings plan, landlord mediation, and social service referrals to our community partners	
	Target Date	12/31/2025	
	Estimate the number and type of families that will benefit from the proposed activities	40 persons assisted	
	Location Description	333 W. 4th Street, Bethlehem, PA	
	Planned Activities	Staffing and administration costs for the Representative Payee Program.	
	9	Project Name	Community Housing Development Organization (CHDO) - Community Action
	Target Area	City of Bethlehem	
	Goals Supported	Enhance Homeownership Opportunities	
	Needs Addressed	Improve the quality of existing housing	
	Funding	HOME: \$62,577.96	

	Description	Provide funds to produce affordable housing opportunities, and any other HOME CHDO-eligible activity, using the 15% CHDO set-aside funding as required under the HOME Investment Partnerships (HOME) entitlement grant.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	This is an administrative activity and will not have direct beneficiaries
	Location Description	
	Planned Activities	This program will provide funds to produce affordable housing opportunities using the 15% CHDO set-aside funding as required under the HOME Investment Partnerships (HOME) entitlement grant. These eligible set-aside activities include: the acquisition and/or rehabilitation of rental housing; new construction of rental housing; acquisition and/or rehabilitation of homebuyer properties; new construction of homebuyer properties; and direct financial assistance to purchasers of HOME-assisted housing that has been developed with HOME funds by the CHDO, and any other CHDO-eligible activity.
10	Project Name	HOME Affordable Housing Project Opportunities
	Target Area	City of Bethlehem Northside 2027
	Goals Supported	Enhance Homeownership Opportunities
	Needs Addressed	Improve the quality of existing housing
	Funding	HOME: \$312,888.00
	Description	Undertake any HOME-eligible affordable housing activities and projects.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	5 homeowner units acquired; yet-to-be-determined number of rental units newly-constructed or rehabilitated
	Location Description	City of Bethlehem Northside 2027 Area (NRSA) aka Northside Alive

	Planned Activities	Undertake any HOME-eligible affordable housing activities and projects. Fund planning and design activities, acquisition, development, and/or construction costs and any other HOME-eligible costs related to affordable housing projects and/or the capacity to carry out such projects, including without limitation rental rehabilitation, rental new construction, payment assistance, any CHDO-eligible costs (including without limitation, CHDO operating expenses), and payment assistance. Currently, the City does not have any TBRA activities,
11	Project Name	North Penn Legal Services
	Target Area	City of Bethlehem
	Goals Supported	Address Impediments to Fair Housing Choice
	Needs Addressed	Enhance the Availability of Community Services
	Funding	CDBG: \$15,000.00
	Description	The City of Bethlehem is required to provide or fund fair housing services such as this program. NPLS provides high quality legal services to low-income residents of 20 counties in Northeast Pennsylvania in a wide range of civil legal matters. This activity will fund a portion of the Fair Housing staff for the Lehigh Valley Fair Housing Project. NPLS Fair Housing staff work out of NPLS's Bethlehem office and serve low-income people from the Lehigh Valley including Bethlehem City residents.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	80 persons assisted
	Location Description	
	Planned Activities	The City of Bethlehem is required to provide or fund fair housing services such as this program. NPLS provides high quality legal services to low-income residents of 20 counties in Northeast Pennsylvania in a wide range of civil legal matters. This activity will fund a portion of the Fair Housing staff for the Lehigh Valley Fair Housing Project. NPLS Fair Housing staff work out of NPLS's Bethlehem office and serve low-income people from the Lehigh Valley including Bethlehem City residents.
	Project Name	Drop-In Center (New Bethany)

12	Target Area	City of Bethlehem
	Goals Supported	Support Homeless Housing and Services
	Needs Addressed	Enhance the Availability of Community Services
	Funding	CDBG: \$75,000.00
	Description	Includes \$24,100 in reallocated funds. New Bethanys Southside Drop-In Center meets people where they are starting with the most fundamental of human needs nutritious food, kindness and respect, and access to basic hygiene. This continuum of street-level human services is designed to improve the health and safety of our neighbors. It starts with a meal. New Bethany has experienced a 40% in neighbors coming to the Drop-in Center since the start of the pandemic. The kitchen needs facilities improvements order to meet this increasing demand
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	500 persons assisted
	Location Description	
	Planned Activities	New Bethany's Southside Drop-In Center meets people where they are starting with the most fundamental of human needs – nutritious food, kindness and respect, and access to basic hygiene. This continuum of street-level human services is designed to improve the health and safety of our neighbors. It starts with a meal. New Bethany has experienced a 40% in neighbors coming to the Drop-in Center since the start of the pandemic. The kitchen needs facilities improvements order to meet this increasing demand
	Project Name	Community Action Development Bethlehem Southside Exterior Rehabilitation and Weatherization Program
13	Target Area	City of Bethlehem Northside 2027
	Goals Supported	Preserve Owner-Occupied Housing
	Needs Addressed	Improve the quality of existing housing
	Funding	CDBG: \$66,000.00

	Description	<p>CDBG funds from the City of Bethlehem will be used to implement a targeted residential facade improvement program to improve the appearance of Southsides Tomorrow neighborhoods, and the Northside Alive NRSA and make crucial repairs to homes inhabited by low- to moderate-income residents. Specifically, at least four (4) residential facades will be funded by the City. Funds will be given directly to the contractor performing the repairs, with no funds directed to the homeowner. Recipients will be low- to moderate-income homeowners, NRSA residents or otherwise eligible homeowners, or local landlords who have a property in the target neighborhoods. An effort will be made to coordinate with Community Action Homes to concentrate the work to increase the impact. CADB will also attempt to coordinate these efforts with the City of Bethlehems emergency housing repair program and Healthy Homes program as well as CALVs Weatherization program so that homeowners can improve both the exterior and interior of their homes.</p>
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	4 households
	Location Description	Bethlehem, PA NRSA; Southside Vision Area

	Planned Activities	CDBG funds from the City of Bethlehem will be used to implement a targeted residential façade improvement program to improve the appearance of Southside's Tomorrow neighborhoods, and the Northside Alive NRSA and make crucial repairs to homes inhabited by low- to moderate-income residents. Specifically, at least four (4) residential façades will be funded by the City. Funds will be given directly to the contractor performing the repairs, with no funds directed to the homeowner. Recipients will be low- to moderate-income homeowners, NRSA residents or otherwise eligible homeowners, or local landlords who have a property in the target neighborhoods. An effort will be made to coordinate with Community Action Homes to concentrate the work to increase the impact. CADB will also attempt to coordinate these efforts with the City of Bethlehem's emergency housing repair program and Healthy Homes program as well as CALV's Weatherization program so that homeowners can improve both the exterior and interior of their homes.
14	Project Name	Holy Family Manor Fire Protection Improvements
	Target Area	City of Bethlehem
	Goals Supported	Improve Public Facilities and Infrastructure
	Needs Addressed	Provide quality infrastructure and community facil Foster Strong, Vibrant Neighborhoods
	Funding	CDBG: \$75,000.00
	Description	Includes \$75,000 in reallocated funds. Holy Family Senior Living requests funds to assist our organization with the upgrade of our fire protection system in our Holy Family Manor buildings, McShea and the Pavilion, which houses both short-term rehabilitation residents and long-term care nursing residents. The current equipment has surpassed its useful life, and the parts needed to ensure the functioning of the standby power supply are obsolete and can no longer be purchased or repaired
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	90 persons assisted
	Location Description	

	Planned Activities	Holy Family Senior Living requests funds to assist our organization with the upgrade of our fire protection system in our Holy Family Manor buildings, McShea and the Pavillion, which houses both short-term rehabilitation residents and long-term care nursing residents. The current equipment has surpassed its useful life, and the parts needed to ensure the functioning of the standby power supply are obsolete and can no longer be purchased or repaired
15	Project Name	CDBG Housing Rehabilitation (City of Bethlehem)
	Target Area	Northside 2027
	Goals Supported	Preserve Owner-Occupied Housing
	Needs Addressed	Improve the quality of existing housing
	Funding	CDBG: \$358,658.00
	Description	Includes \$58,658 in reallocated funds. Rehabilitation and emergency repairs to owner-occupied homes of low- to moderate-income residents. Funds will be used to rehabilitate homes throughout the City
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	30 households assisted
	Location Description	City of Bethlehem Northside 2027
	Planned Activities	Construction costs associated with full home rehabilitation, emergency home rehabilitation, and facade improvements.
16	Project Name	CDBG Housing Rehab Program Delivery (City of Bethlehem)
	Target Area	Northside 2027
	Goals Supported	Preserve Owner-Occupied Housing
	Needs Addressed	Improve the quality of existing housing
	Funding	CDBG: \$241,500.00
	Description	CDBG Housing Rehab Program Delivery (City of Bethlehem)
	Target Date	12/31/2025

	Estimate the number and type of families that will benefit from the proposed activities	Activity delivery costs of rehabilitation program (#15)
	Location Description	City of Bethlehem Northside 2027 (NRSA) aka Northside Alive Area
	Planned Activities	Housing rehab program delivery associated with staff costs for the CDBG funded Housing Rehabilitation Program. Cost of salary and fringe benefits for City housing rehab staff.
17	Project Name	Goepp St Improvements
	Target Area	Northside 2027
	Goals Supported	Improve Public Facilities and Infrastructure
	Needs Addressed	Provide quality infrastructure and community facil
	Funding	CDBG: \$199,990.00
	Description	Corridor improvements along two sections of Goepp St from Main St. to New St and from Center St.to High St. Both segments are located within the Northside 2027 plan with the section from main St to New St also located in a designated LMI neighborhood. The scope of work includes ADA accessibility improvements, plant street trees, remove and replace concrete and brick sidewalks. These improvements aim to increase pedestrian safety, and enhance the overall walkability.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	3360 persons assisted
	Location Description	
	Planned Activities	Corridor improvements along two sections of Goepp St from Main St. to New St and from Center St. to High St. Both segments are located within the Northside 2027 plan with the section from main St to New St also located in a designated LMI neighborhood. The scope of work includes ADA accessibility improvements, plant street trees, remove and replace concrete and brick sidewalks. These improvements aim to increase pedestrian safety, and enhance the overall walkability.

18	Project Name	4th St Improvements
	Target Area	Northside 2027
	Goals Supported	Improve Public Facilities and Infrastructure
	Needs Addressed	Provide quality infrastructure and community facilities Foster Strong, Vibrant Neighborhoods
	Funding	CDBG: \$100,000.00
	Description	Includes \$100,000 in reallocated funds. Corridor improvements along W 4th Street from S New Street to Broadway which is located on the southside of Bethlehem in an LMI neighborhood. The scope of work includes ADA accessibility improvements, plant street trees, remove and replace concrete and brick sidewalks. These improvements aim to increase pedestrian safety, and enhance walkability.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	465 persons assisted
	Location Description	
	Planned Activities	Corridor improvements along W 4th Street from S New Street to Broadway which is located on the southside of Bethlehem in an LMI neighborhood. The scope of work includes ADA accessibility improvements, plant street trees, remove and replace concrete and brick sidewalks. These improvements aim to increase pedestrian safety, and enhance walkability.
19	Project Name	Future Projects TBD
	Target Area	City of Bethlehem
	Goals Supported	Improve Public Facilities and Infrastructure
	Needs Addressed	Provide quality infrastructure and community facilities Foster Strong, Vibrant Neighborhoods
	Funding	CDBG: \$53,104.00
	Description	Includes \$14,595 in reallocated funds. Funding for direction to existing or new projects
	Target Date	12/31/2025

	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	
	Planned Activities	Funding for direction to existing or new projects
20	Project Name	CDBG and HOME Program Administration
	Target Area	City of Bethlehem
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	CDBG: \$283,661.00 HOME: \$41,718.00
	Description	Salary and wages of local staff as well as professional fees for consultants and any other eligible activities to assist with the administration of the HOME and CDBG programs.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	This administrative activity will not have direct beneficiaries.
	Location Description	10 E Church St Bethlehem, PA 18018
	Planned Activities	This activity will reimburse the City for salary and wages of employees administering the CDBG and HOME programs. Funds may also be used to pay for professional services, salary and wages of local staff, as well as professional fees for consultants to assist with the administration of the HOME and CDBG programs, and any other eligible activities.
21	Project Name	Northside Alive Strategy
	Target Area	Northside 2027
	Goals Supported	Support High Quality Public Services
	Needs Addressed	Enhance the Availability of Community Services
	Funding	CDBG: \$24,710.00

	Description	Includes \$24,710 in reallocated funds. Updated NRSA strategy in connection with NRSA reapplication.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	This administrative activity will not have direct beneficiaries.
	Location Description	
	Planned Activities	Updated NRSA strategy in connection with NRSA reapplication.
22	Project Name	RDA's Blight Elimination Program
	Target Area	City of Bethlehem
	Goals Supported	Enhance Homeownership Opportunities
	Needs Addressed	Increase the rate of homeownership
	Funding	CDBG: \$30,641.00
	Description	Includes \$30,641 in reallocated funds. City's blight elimination program
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	
	Planned Activities	Activity delivery costs, acquisition, and rehabilitation costs of City's blight elimination program

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

In 2025, the City is targeting approximately 83.1% of CDBG funds, specifically to the neighborhoods of the City of Bethlehem and/or residents of the City of Bethlehem. The remaining 16.9% will be allocated to the Northside 2027.

Geographic Distribution

Target Area	Percentage of Funds
City of Bethlehem	83
Northside 2027	17

Table 57 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The Consolidated Plan seeks to address priority needs both citywide as well as in the designated targeted area. Housing rehab, assistance to seniors and at-risk youth services, homeless services, neighborhood improvements, and special needs populations are not limited by geographic boundaries. CDBG and HOME resources will be allocated geographically as:

- Citywide
- Northside NRSA - The NRSA designation allows the full range of HUD-funded benefits to be targeted. The NRSA is sometimes referred to as “Northside Alive” or the “Northside 2027” area.

While focusing on the Northside, the City will remain cognizant of the fact that important and needed work remains on the Southside. 2025 applications for projects and activities leverage CDBG and HOME resources with other federal, state, and local support.

For PY2025, City anticipates providing 16.9% of CDBG funds available to Northside activities and 15.25% of available CDBG funds to Southside activities.

Discussion

The Northside Alive neighborhood was identified in 2017-18 as a potential Neighborhood Revitalization Strategy Area (NRSA) via an extensive community planning process. The program saw great progress in 2023 as the City hired a Northside neighborhood coordinator tasked with working with residents and local stakeholders to implement revitalization programs. The City completed the Friendship Park redesign planning study, a community-driven reimagining of a park at the center of the neighborhood, which cost \$30,000. Friendship Park is a community gathering place steps from the Linden Street business corridor, but its current lack of shade and expansive asphalt mean it is often underutilized. Design plans call for the installation of a splash pad, which would be the only public water feature within two miles of the neighborhood. The City is moving forward with final design and engineering for the redesign with the goal of starting construction in 2024. The finished park will be a community hub and a

potential boost to the neighboring business district.

The City conducted a neighborhood housing survey in the fall of 2023 to identify properties for a CDBG-funded façade program surrounding the Friendship Park area. The City is working with applicants for the façade program currently to qualify them for the program. In 2024, the City continues to host and participate in regularly scheduled housing committee meetings with community members and stakeholders, to identify housing and public service needs in the NRSA and potentially fund projects. These meetings include City staff, local residents, representatives from the development community, and local school officials.

Businesses and residents have identified the walkability and bikeability of the Northside Alive neighborhood as a major concern. Through collaboration with the Northside Alive Safe and Vibrant Public Realm Committee and the Coalition for Appropriate Transportation, the City invested in bike racks and crosswalk improvements throughout the neighborhood. The bike racks were installed in front of local businesses throughout the neighborhood at no cost to the businesses. The City also invested \$20,000 to hire a design firm to create a neighborhood brand for Northside Alive to foster an identity for residents and businesses within the zone. The City then provided local businesses with branding materials, like posters and window clings, at no cost and invested in Northside Alive banners to cohesively link the two main business districts within the neighborhood. Beyond branding, the City organized a business mixer and other in-person events to build cohesion among the local business community and the neighborhoods in the NRSA.

The City pays the salary of the Northside Alive neighborhood coordinator, who works with local businesses, residents, and community stakeholders to implement the revitalization strategies identified within the Northside 2027 plan (plan which supported the City NRSA application), which serves as a blueprint for neighborhood investment. The City created this position in 2022 to centralize coordination of community organizing and other efforts in the NRSA. The City is funding this position from non-CDBG sources evidencing its commitment to funding investment in the people, facilities, and housing in the NRSA and leveraging CDBG resources devoted to other NRSA projects.

In 2022 the City began planning with the community for the revitalization of Friendship park. In 2023 and 2024, design and permitting work continued, with construction expected to begin in 2024.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The preservation and expansion of affordable housing opportunities are stated goals from the City's 2020-24 Five Year Consolidated Plan. In addition, the City intends to improve the housing stock in the Northside NRSA. As such, affordable housing activities for in 2025 include, without limitation:

- Rehabilitation of homes owned and occupied by low-income residents.
- First time homebuyers' program (BHAP) providing subsidies for up to 10 percent of downpayment and closing costs.
- Facade improvements to homes
- The acquisition, rehabilitation, and resale of homes for low-income buyers
- Construction of new single family housing

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	5
Special-Needs	0
Total	5

Table 58 - 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	0
Rehab of Existing Units	0
Acquisition of Existing Units	5
Total	5

Table 59 - One Year Goals for Affordable Housing by Support Type

Discussion

Affordable housing is crucial in Bethlehem for several reasons. It helps individuals and families, with lower incomes, have improved access to safe and stable housing and helps to reduce homelessness. Additionally, affordable housing fosters economic vitality by attracting and retaining an economically-diverse workforce, which is essential for the City's growth and sustainability. Moreover, it contributes to community stability by allowing residents to establish roots and build connections within City neighborhoods. As discussed above, in 2023, the City of Bethlehem published a report titled "Opening Doors: Strategies to Build Housing Stability in Bethlehem" (Housing Plan or Opening Doors). The current City administration considers the current affordable housing crisis to be a key City priority and is in alignment with the current City Council on the importance of addressing affordable housing challenges

with realistic and cost-efficient programs.

AP-60 Public Housing – 91.220(h)

Introduction

The Bethlehem Housing Authority (BHA) recently partnered with the City and was awarded a Choice Neighborhoods grant to transform the Pembroke Village target housing site and the surrounding Stefko / Pembroke Neighborhood into a more desirable community of choice. This collaboration ensures a joint focus on all three core goals of the CN: Housing – through the replacement of obsolete public housing with financially viable, energy efficient, mixed-income housing within a larger program of neighborhood reinvestment; People – creating and enhancing opportunities for BHA residents and other low- and moderate income families to improve their quality of life; and Neighborhood – transforming a distressed, high-poverty area to well-functioning mixed-use and mixed-income neighborhood.

Moreover, BHA owns and operates more than 1,400 affordable housing units across 11 properties in the City of Bethlehem. BHA identified several populations in greater need including Elderly and handicap households and single mother households. BHA feels the biggest challenge will be to provide enough affordable housing to meet the needs of the community. The current demand has severely outpaced the supply, caused by regulation, cost, lack of affordable homes for sale, and suitable land for development.

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

BHA and the City will work on the Choice Neighborhood grant together, garnishing community engagement and collaborative efforts as needed.

BHA reports that almost all complexes are in good condition, with a few considered fair. The BHA will continue annually to make improvements to complexes in general and housing units where needed to guarantee a safe, decent home for each resident. BHA strives to decrease families on its wait list.

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

Since the passing of “The Quality Housing and Work Responsibility Act of 1998”, the BHA has had a Resident Advisory Board, comprised of a representative from each development/building. The Board members meet monthly to assist the Authority in preparation and updating of the Five Year and Annual Plans. BHA encourages and funds Resident Councils in all their developments/buildings. The resident Council members are voted by the residents in an election process which is overseen by BHA staff. Councils are required to hold meetings and set up information sessions that are of interest and importance to the residents. The Board meets at least three times a year to assist the BHA to prepare and update the Annual Plans.

There is a greater need for rental assistance, more affordable housing, homelessness prevention and eviction prevention programs and services, childcare services, and mental health and substance abuse services. BHA acknowledges that residents’ biggest challenge is reaching housing independence, and

keeping up with the changing technology needed to make employment advancement and increased family wealth.

Representatives from the City receive all BHA meeting agendas and minutes and review all to become familiar with concerns of the board and, more importantly, the resident advisory board. Moreover, City Council maintains an appointed liaison to the BHA who attends meetings. A representative of the Community and Economic Development Department also attends BHA meetings to coordinate activities. The City supplies information regarding HOME funded units to the BHA Director and has requested our HOME funded organizations directly solicit residents of the BHA when marketing their apartment units or income qualified homes.

Information on the City's Bethlehem Housing Assistance Program will be provided to Housing Authority residents. In 2025, the City is currently partnering with the BHA on seeking out and applying for housing grants beyond the scope of CDBG and HOME programs.

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

The Bethlehem Housing Authority is not a troubled PHA. BHA received a score of 94 for Fiscal Year 2023 and is deemed a High Performing authority.

Discussion

BHA is integral to the City of Bethlehem as it serves as a primary vehicle for addressing the pressing housing needs of low-income residents within the community. By providing affordable housing options, rental assistance programs, and supportive services, the BHA plays a vital role in ensuring that City residents have access to safe and decent housing. Additionally, the authority's efforts contribute to community development and revitalization and fostering economic growth and social mobility. Through its various initiatives and partnerships, the BHA helps strengthen the fabric of the City, promoting stability, opportunity, and a better quality of life for all residents.

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

Introduction

The City of Bethlehem is actively addressing homelessness through Community Development Block Grant (CDBG) funding by implementing a range of targeted initiatives and support services. With CDBG funding, Bethlehem has established comprehensive programs aimed at preventing homelessness, providing funding to emergency shelters, and aiding individuals and families experiencing housing instability. These initiatives include rental assistance programs, supportive services, and outreach efforts to connect homeless individuals with housing and employment resources. Additionally, Bethlehem allocates CDBG funds to support homeless shelters, transitional housing facilities, and supportive housing developments, creating a continuum of care to address the diverse needs of the homeless population. Through strategic investments and partnerships with local organizations and service providers, the City of Bethlehem is making significant strides in combating homelessness and promoting housing stability for its residents.

The City continues to address the underserved needs of area residents through participation in regional housing forums, fair housing activities and events, and most notably the Lehigh Valley Regional Homeless Advisory Board (LVRHAB). The City works with public service providers, including the Bethlehem Emergency Shelter, New Bethany, Northampton County and Lehigh County Homeless Assistance Programs (HAP) to address emergency shelter and transitional housing needs. The City participates in RHAB and is represented by its Deputy Director of the Department of Community and Economic Development.

To effectively meet the demand for homeless services, Homeless Assistance Program (HAP) funds are block granted to all 67 Pennsylvania counties. HAP funds help assure:

1. homelessness can be avoided through a variety of prevention services assisting clients to maintain affordable housing;
2. people who are homeless can find refuge and care; and
3. homeless and near homeless clients are assisted in moving toward self-sufficiency. City residents in Northampton County can access services through the Northampton County Department of Human Services in Easton, while the residents within Lehigh County receive services through the Lehigh County Department of Aging and Adult Services in Allentown. In general, the City refers all applications for assistance, relative to homelessness, to the Eastern PA Continuum of Care/RHAB.

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

In the City of Bethlehem, reducing homelessness is a top priority, and the City has outlined several ambitious goals and actions to achieve significant progress within the next year. One key goal is to decrease the number of individuals experiencing homelessness through a combination of prevention, intervention, and housing stabilization efforts and programs. To achieve this goal, Bethlehem will focus

on expanding access to affordable housing options, implementing rapid rehousing programs, and enhancing coordination with local service providers to streamline access to supportive services. In the next year, Bethlehem aims to increase the availability of affordable housing units. By increasing the supply of affordable housing, Bethlehem seeks to provide stable and permanent housing solutions for individuals and families experiencing homelessness, thus reducing reliance on emergency shelters and transitional housing facilities. Additionally, Bethlehem will prioritize the implementation of homelessness prevention programs aimed at addressing the root causes of homelessness and housing instability. These programs may include rental assistance, eviction prevention services, and financial counseling to help individuals and families maintain stable housing, achieve homeownership, and avoid homelessness. By investing in prevention efforts, Bethlehem aims to proactively address housing crises before they escalate, ultimately reducing the overall incidence of homelessness in the community. In 2023, the City submitted a HOME-ARP allocation plan to HUD allocating funds to the acquisition/rehabilitation/development of a non-congregate emergency shelter that will serve qualifying populations.

Furthermore, Bethlehem will strengthen its partnerships with local homeless service providers, faith-based organizations, and community stakeholders to ensure a coordinated and comprehensive response to homelessness. Through enhanced collaboration and information sharing, Bethlehem will improve the effectiveness of its homelessness response system, increase access to supportive services, and better meet the diverse needs of individuals experiencing homelessness. Bethlehem is committed to making measurable progress in reducing homelessness and creating a more cohesive and resilient community for all residents.

Addressing the emergency shelter and transitional housing needs of homeless persons

While the city does not receive ESG funding, the city is dedicated to addressing the emergency shelter and transitional needs of homeless persons by implementing a comprehensive approach that prioritizes both immediate assistance and long-term solutions. Bethlehem collaborates closely with local homeless service providers, shelters, and transitional housing facilities to ensure that individuals and families experiencing homelessness have access to safe and supportive environments where they can receive temporary shelter, necessities, and wraparound services. Additionally, Bethlehem allocates resources to enhance the capacity and quality of emergency shelters and transitional housing programs, ensuring that they are equipped to meet the diverse needs of homeless individuals while also providing pathways to permanent housing through rapid rehousing initiatives, case management, and supportive services. By prioritizing emergency shelter and transitional housing as integral components of its homelessness response system, Bethlehem strives to provide compassionate and effective support to those in need while working towards the goal of ending homelessness in the community. City administration annually works closely with the Bethlehem Emergency Shelter to organize its winter shelter. In 2023, the City submitted a HOME-ARP allocation plan to HUD allocating funds to acquisition/rehabilitation/development of a non-congregate emergency shelter that will serve qualifying populations. Additionally, through the CoC and County Homeless Assistance Programs, comprehensive and varied programs are available to Bethlehem residents and the region to assist the homeless in making the transition to permanent housing including addressing special needs of persons who are not

homeless.

In 2020, an Affordable Housing Task Force was created to help guide future actions needed with development and land use regulation changes.

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

The larger population of homeless in the City of Bethlehem does not meet HUD's definition of chronically homeless. They are individuals or families who increasingly cannot find affordable housing, family members who are couch surfing, experiencing barriers to finding or obtaining affordable units, or are individuals facing eviction due to rising rents or crowded conditions.

Some forms of assistance relate to the individual or family's housing situation and referrals can be made locally to New Bethany and or regionally to the Pennsylvania Coalition Against Domestic Violence (PCADV), the National Alliance to End Homelessness, the National Coalition for the Homeless or specific programs of the US Department of Housing and Urban Development (HUD). Turning Point of the Lehigh Valley aids in finding permanent, safe housing for victims of domestic violence and Valley Youth House assists with permanent housing solutions for homeless children.

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.- add depending on subrecipients chosen by city.

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

Several 2025 activities are aimed at preventing homelessness:

- Housing Rehab Program reduces the impacts of a deteriorating home and thus helps keep homeowners in their homes.
- New Bethany's Representative Payee Program combats homelessness by providing fiduciary, financial management, and family budgeting services - including paying rent and utility bills on time. This assistance is especially helpful to individuals with mental health and other physical challenges.

- The ShareCare volunteer service program helps keep the elderly and disabled in their homes with a variety of home and respite care services.
- Additionally, other CDBG-funded programs provide food assistance and other services to individuals that indirectly help prevent homelessness by providing support that helps families to allocate scarce financial resources to housing needs.

Discussion

The City of Bethlehem is steadfast in its commitment to addressing homelessness with compassion and effective solutions. Through collaborative efforts between local government, community organizations, and residents, Bethlehem aims to provide comprehensive support to individuals experiencing homelessness. Initiatives include the expansion of affordable housing options, access to mental health and substance abuse services, job training programs, and outreach efforts to connect individuals with necessary resources. Bethlehem recognizes the dignity of every person and strives to create a supportive environment where all residents can thrive.

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

Introduction:

The 2025-2029 Analysis of Impediments (AI) to Fair Housing Choice for the City of Bethlehem is a thorough examination of housing practices in the community, aimed at addressing fair housing barriers that hinder equal housing opportunities for residents. This report is part of the City's commitment to fostering a resilient community through housing access and is rooted in federal and state fair housing laws.

This AI sets out to accomplish several objectives, beginning with an overview of federal and state fair housing laws which outline protected characteristics. Next, community engagement results are reflected upon followed by an analysis of socio-demographic, economic, and housing market and availability factors that may impact fair housing choice. The AI then reviews local lending practices, local public policies, and the local housing market to identify any potential barriers to fair housing choice. Finally, the AI identifies potential impediments to fair housing choice and recommends actions the City can take to mitigate or eliminate these barriers.

Data for this AI was gathered through surveys, community forums, stakeholder engagement, and comprehensive data analysis from various sources to ensure a thorough understanding of the issues at hand. Major barriers identified include housing discrimination; lending practices; the age, size, quality, and availability of the City's housing stock; accessibility of housing; increasing number of unsheltered homeless persons; increasing cost of housing; restrictive zoning; as well as a significant population of City residents having the limited English proficiency or being a racial/ethnic minority.

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

To effectively address these barriers, the AI recommends five (5) goals and related actions aimed at enhancing the overall accessibility and affordability of housing in the community: support critical public services, provide support to homeless residents, advance fair housing best practices, increase housing supply/improve housing stock, and coordinate and implement effective housing strategies.

Discussion:

Bethlehem holds the removal of barriers to affordable housing as a key priority due to several compelling reasons deeply intertwined with the city's social, economic, and moral fabric. Firstly, increasing access to affordable housing is fundamental to reducing barriers to housing, economic opportunity, and education within the community. By addressing barriers to affordable housing, Bethlehem aims to reduce disparities and create a more mobile society where individuals of all income levels can live and thrive. Secondly, affordable housing is crucial for fostering economic stability and growth and supporting individual and community health.

In summary, Bethlehem takes barriers to affordable housing very seriously because it recognizes the

multifaceted benefits of improving access to affordable housing for its residents. From promoting social mobility and economic stability, to enhancing public health and fostering community cohesion, addressing barriers to affordable housing is essential for building a vibrant and thriving City.

The following findings and recommended actions are based on data analysis performed in this AI, stakeholder outreach, and community participation. Actions, goals, and categories are not listed in any order of priority.

GOAL 1: Support Critical Public Services.

Recommended Actions:

- 1.1 Encourage public service organizations to apply for funding to support the organization and/or its public services
- 1.2 Fund significant impact services to support resident needs
- 1.3 Fund services in Neighborhood Revitalization Strategy Area

Homelessness

GOAL 2: Provide Support to Homeless Residents.

Recommended Actions:

- 2.1 Address increasing number of unsheltered homeless residents
- 2.2 Fund homeless shelters and services for homeless residents

Fair Housing

GOAL 3: Advance Fair Housing Practices.

Recommended Actions:

- 3.1 Support residential and organizational education in fair housing practices
- 3.2 Assist Limited English Proficiency residents
- 3.3 Reduce housing discrimination

Housing

GOAL 4: Increase Housing Supply/Improve Housing Stock.

Recommended Actions:

- 4.1 Provide homebuyer education
- 4.2 Provide housing assistance
- 4.3 Improve accessibility of housing

- 4.4 Rehabilitate older units
- 4.5 Develop units for large families

Strategies

GOAL 5: Coordinate and Implement Housing Strategies.

Recommended Actions:

- 5.1 Revise zoning to be less restrictive

- 5.2 Implement Opening Doors Strategy
- 5.3 Create developer incentives for affordable housing
- 5.4 Participate in regional coordination

AP-85 Other Actions – 91.220(k)

Introduction:

Bethlehem places a high priority on caring for its underserved communities. Recognizing that underserved communities often face systemic barriers to opportunities and resources, Bethlehem is dedicated to addressing these disparities through targeted initiatives and support programs. This commitment stems from the belief that every individual deserves access to essential services, opportunities for advancement, and a dignified quality of life, regardless of their background or circumstances. This year, Bethlehem plans to further its efforts in supporting underserved communities through a multifaceted approach. This includes partnering with local organizations and service providers to deliver targeted assistance and support programs tailored to the specific needs of underserved populations.

Bethlehem prioritizes community engagement and empowerment by amplifying the voices of underserved communities in decision-making processes and policy development. By fostering dialogue and collaboration, the City aims to ensure that the concerns and priorities of underserved communities are effectively addressed and integrated into municipal initiatives and planning efforts. Additionally, Bethlehem will work to strengthen social safety nets and support networks for underserved populations, including initiatives to combat homelessness, food insecurity, and access to mental health services. Through proactive outreach, advocacy, and partnership-building, the City seeks to create a more resilient and supportive environment where all residents can thrive. In conclusion, Bethlehem's commitment to caring for underserved communities reflects its core values of community empowerment, compassion, and solidarity. By prioritizing the needs of underserved populations and implementing targeted strategies for support and empowerment, Bethlehem aims to foster a more compassionate and thriving community for all residents.

Actions planned to address obstacles to meeting underserved needs

Identified obstacles to meeting underserved populations include reducing barriers to rental and owner housing, e.g., rental deposits, down payments, homeless family services, and meeting needs of single female families. Bethlehem plans to continue addressing these obstacles by continuing to pursue all appropriate funding opportunities for housing development, preservation, and family assistance. BHA has determined that the allocation of federal funds should be more flexible. Funding should go where it's needed most. Currently, HUD payment standards do not reflect market rents and needs of the marketplace. One solution is to leverage those federal funds lying in reserve to pay landlords to set aside more of their units to those in a desperate need without claiming statutory limitations to spending such idle funds.

Actions planned to foster and maintain affordable housing

As detailed in AP-38 - Projects - and AP-55 - Affordable Housing, the City is taking several steps to foster and maintain affordable housing, including subsidizing the creation of new affordable units, the

purchase and rehab of units and the preservation of existing units.

Actions planned to reduce lead-based paint hazards

The City successfully obtained Lead-Healthy-Homes funding to target, assess and remediate lead risks for low-moderate income households. The City partners with Northampton County and City of Easton to target and assess lead risks for low- and moderate-income households. The Healthy Homes Program provides the opportunity to identify lead-based paint hazards, provide education, and provide materials to help residents create and maintain a safe environment. The City also partnered with the Lead Hazard Control Program to provide abatement from such hazards.

Through the Residential Rehabilitation Program, the City provides housing repairs as well as lead-based paint abatements. The City completed 24 homeowner-occupied rehabilitation projects in 2024 through Healthy Homes Production. The City's Healthy Homes Program provides a thorough, customized home visiting program. The process includes: a walk-through of the home, assessment documentation, education, and leave-behind materials to help residents create and maintain a healthy and safe environment. This program, teamed with the Lead Hazard Control Program, provides needed lead assessment and abatement from the hazards that are central to lead poisoning. The City's Healthy Homes Program together with the Lead Hazard Control Program completed 32 projects in 2024. The Health Bureau and the Housing and Community Development Bureau work together to conduct lead abatement construction activities for income-eligible homeowners.

Additionally, any property owner in the City can request a lead inspection of their property. The City assesses a fee for this service to cover the cost of the inspectors' time. The Health Bureau and the Housing Rehabilitation staff coordinate on issues where elevated blood lead levels are identified.

Actions planned to reduce the number of poverty-level families

The City implements various activities and strategies to reduce the number of poverty-level families in the community. The activities include:

- Job Creation Initiatives: Encouraging economic development and attracting businesses to create job opportunities for residents.
- Affordable Housing Initiatives: Building or subsidizing affordable housing options for low-income families.
- Social Services Support: Providing access to social services such as food assistance, healthcare, childcare, and transportation.
- Community Partnerships: Collaborating with local organizations and nonprofits to provide additional support and resources to families in need.
- Education and Youth Programs: Investing in quality education and after-school programs to support children and youth from low-income families.
- Section 3: The City works to comply with HUD guidance on utilization of firms owned by or employing low-income persons.

In 2021 the City adopted an Affordable Housing LERTA District. Two active LERTA districts currently exist as authorized in respective City ordinances: Article 342 ("Affordable Housing LERTA" effective 9/7/2021 - 12/31/2026) and Article 343 ("Southside LERTA II" effective 1/1/2023 - 12/31/2027). Both contain affordability requirements for residential developments of 10 or more dwelling units. A developer seeking LERTA abatement for improvements (including new construction) that include 10 or more units must either set aside 10% of those dwelling units for low, very low, or extremely low income per HUD guidelines; or pay an in-lieu fee, based on dwelling unit quantity, into the City's Affordable Housing Fund. City Council established the fund in Article 342 for the purpose of support major affordable housing development, capitalizing low-interest grant or loan programs aimed at affordable housing, and funding rental assistance initiatives.

The City's Bureau of Economic Development uses a variety of funding sources to aid local businesses in an effort to expand the supply of quality jobs for LMI workers. The City brings together key partners to aggressively pursue grant opportunities and build incentive zones that respond to the needs of residents, local business owners, and developers. By uniting supply-side housing and redevelopment interventions with an expanded push for secure, high-quality jobs, the City hopes to develop an economy that affords all residents the opportunity to work where they live while contributing to a flourishing local business community.

Actions planned to develop institutional structure

Ongoing staff development, consultant input and community dialogue will continue to strengthen the Housing and Community Development Bureau performance in upcoming years.

In 2023 and 2024, DCED conducted training sessions with subrecipients to help with grant administration, monitoring and compliance, application development, and construction labor standards-Davis Bacon Wage requirements. These efforts will help staff and subrecipients apply for and administer CDBG and HOME funding sources, ensuring all resources are highly integrated and administered efficiently. The Community Development Bureau is responsible for the following:

- Program management and oversight
- Inter-department/agency coordination
- Subrecipient contract administration and monitoring
- Program evaluation and risk assessment
- Report preparation and submission
- Technical assistance
- Special project development
- Consolidated Plan and Annual Action Plan preparation, monitoring, and evaluation
- Select housing programs

In 2025 and going forward, City staff will continue to hold training sessions with subrecipients. Beyond City staff, the Community Development Bureau will maintain strong relationships with public agencies including the governments of Lehigh and Northampton counties, the Bethlehem Housing Authority, and

a network of non-profit and public service organizations.

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

The City recognizes the importance of partnership between the public, private, and social service agencies. The City does the following to enhance coordination between public and private housing and social service agencies:

- The City collaborates on the development of strategic plans, needs assessments, and resource allocation strategies to ensure alignment and maximize impact across public and private sectors. Specifically, in 2023 the City put together a 5-year action plan to address housing needs in Bethlehem. The community, as well as City staff, were heavily involved.
- Establish partnership agreements and Memoranda of Understanding (MOUs), formalizing partnerships and collaborations through written agreements, outlining roles, responsibilities, and commitments of each party.
- Community engagement and Input from residents, community organizations, and other stakeholders, to gather feedback, ensuring coordinated efforts reflect the needs and priorities of the community.

Discussion:

n/a

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(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
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
3. The amount of surplus funds from urban renewal settlements	0
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
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
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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.	100.00%

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:

The City will not provide forms of assistance that are inconsistent with 24 CFR 92.205 as detailed in 92.205(b) Forms of assistance (1) and (2). All assistance provided by the City under its Owner-

Occupied Housing Rehabilitation Program, Bethlehem Housing Assistance Program; and/or construction, acquisition, rehab and resale activities conducted by other non-profit entities; and any new construction of rental or other housing development activities must meet these requirements.

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:

The City of Bethlehem operates two HOME-funded homebuyer programs, the Bethlehem Homebuyer Assistance Program (BHAP), which provides down payment and closing cost assistance for the purchase of existing units by eligible homebuyers, and a Homebuyer Program which provides funding for the acquisition, construction, rehab, and resale (ARR) of HOME funded units to income-qualified homebuyers.

For the BHAP program and Homebuyer projects that result in direct subsidy, Bethlehem has selected the RECAPTURE option for enforcing the HOME-required period of affordability. For ARR projects that exclusively provide development subsidy, the City will implement the required RESALE provisions.

The City of Bethlehem requires that the HOME-assisted housing must meet the affordability requirements for not less than the applicable period specified by the HOME program requirements, beginning after project completion.

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:

The following describes the City's subrecipients resale and recapture provisions. When the RECAPTURE option is enforced, subsequent homebuyers will not be limited to income-eligible households.

Resale Requirements: When HOME funds are provided to a CHDO/Developer/Owner to develop homebuyer unit(s) with no additional assistance paid to the homebuyer, the City elects to implement resale provisions to meet the affordability requirements applicable to the project.

Resale Terms and Conditions-

1. Homebuyer Household Income must be less than 80% AMI adjusted for family size.
2. Affordability Period – a low-to-moderate household must occupy the residence during the entire affordability period.
3. The homebuyer must occupy the property as their principal residence.

4. Upon sale of the property the initial homeowner must receive a “fair return” – homeowner’s return on original investment including down payment and any capital improvements, less the amount of deferred maintenance that does not meet local code requirements and remediation of all deficiencies identified during inspection.
5. Capital Improvements– Homebuyer would obtain approval from City prior to work being completed - Energy upgrades – HVAC, Water Heater, Insulation and Home modernization.
6. Consumer Price Index – used to calculate the percent gain which applies to sales within the affordability period.
7. Resale Process – When a Resale is triggered during the Period of Affordability, the homeowner and developer shall immediately notify the City and HOME Program staff. The City shall: agree to the new sale price with professional consultation and appraisal; Confirm the fair return calculation; Verify income eligibility of the subsequent homebuyer; Confirm principal residency requirement; and Ensure property is affordable to a reasonable range of low-income home buyers. New HOME funds invested for the subsequent low-income homebuyer will extend the period of affordability according to HOME regulations.
8. Default – failure to comply with the period of affordability requirements may result in demanding repayment of the development subsidy provided to the homebuyers.

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:

n/a

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)). <TYPE=[text] REPORT_GUID=[A0BBB986408D8C25582AC4BE59FA99C5]>

n/a

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)).

n/a

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).

n/a

n/a

Attachments