


# **CITIES OF BETHLEHEM, EASTON, ALLENTOWN, AND NORTHAMPTON COUNTY**



## **ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**

**2021**



**FOR SUBMISSION TO: THE U.S.  
DEPARTMENT OF HOUSING AND  
URBAN DEVELOPMENT (HUD)**



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## REGIONAL PARTNERSHIP

Northampton County is a federal entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) and HOME Partnerships (HOME) programs and is required to affirmatively further fair housing under Section 808 of the Fair Housing Act. To affirmatively further fair housing, the County must conduct an analysis to identify impediments to fair housing choice within the jurisdiction and take appropriate actions to overcome the effects of any impediments identified through the analysis.

The cities of Allentown, Bethlehem, and Easton, in partnership with Northampton County, are preparing a joint Analysis of Impediments to Fair Housing Choice. The partnership is recognized as the Bethlehem, Easton, Allentown, Northampton ("BEAN") Fair Housing Partnership. An Analysis of Impediments is a planning document that examines any public or private actions that have the effect of restricting housing choice, or the availability of housing, based on an individual's race, color, religion, sex, disability, familial status, or national origin.

The BEAN Fair Housing Partnership includes representatives from three (3) federal entitlement communities and three (3) local public housing authorities (PHAs) in the Lehigh Valley to identify the impediments to fair housing choice and develop strategies to address the impediments. Each participant will use the AI document to create their own unique annual Action Plan to affirmatively further fair housing.

The Analysis of Impediments to Fair Housing Choice participants are the following:

- Northampton County
- Northampton County Housing Authority
- City of Allentown
- Allentown Housing Authority
- City of Bethlehem
- City of Easton
- Easton Housing Authority

Northampton County last participated in a Regional Analysis to Impediments (RAI) in December of 2014 in coordination with Lehigh County and the Cities of Allentown, Bethlehem, and Easton. The AI was a regional analysis that examined a number of factors that affected housing opportunities and housing choices from the larger community perspective and how the area as a whole could collaborate on addressing barriers to fair housing choice. The majority of the past participants chose to continue the regional approach and collaborated on this AI to work together on fair housing planning, as well as improving the regional fair housing infrastructure to address fair housing issues that extend beyond jurisdictional boundaries. Lehigh County prepared its own Analysis of Impediments to Fair Housing Choice; which was completed in 2019.

The Analysis of Impediments to Fair Housing Choice fits into a larger collaborative effort between the participants to work jointly on comprehensive planning efforts. Through partnerships, the County can best achieve its housing, community and economic development goals.

Fair housing is a right. The County is committed to promoting housing choice which entails increasing free and equal access to residential housing throughout the Lehigh Valley. The County will direct federal funds to address impediments to housing choice that inhibits an individual's pursuit of personal, educational, and employment goals. If you have any questions or comments, please send them to the County's Fair Housing Designated Officer:

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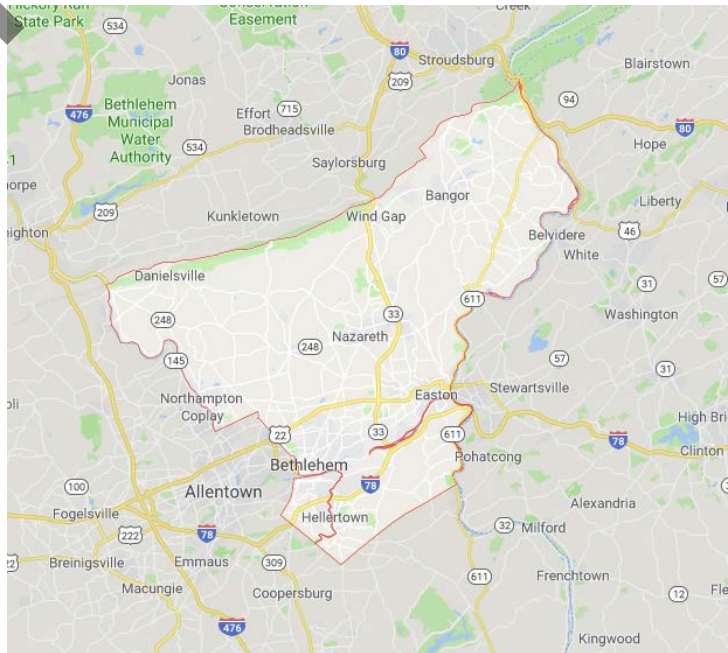
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## Executive Summary

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

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

During FY 2018, Northampton County, Northampton, and Allentown were requalified for entitlement status as an urban county for FYs 2019-2021. The County is comprised of thirty-eight (38) municipalities, which includes two (2) cities, nineteen (19) boroughs, and seventeen (17) townships. All jurisdictions are members of the urban county entitlement program except for the City of Bethlehem, which is a federal CDBG, HOME and ESG entitlement community. The City of Bethlehem is located in Lehigh and Northampton Counties. The City of Easton, a previous federal CDBG entitlement community, and Northampton County entered into a



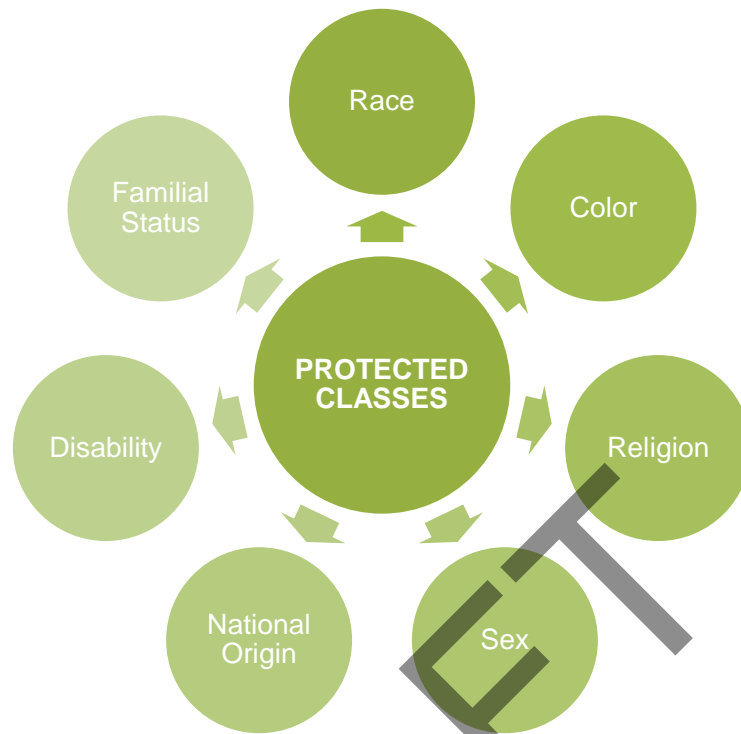
cooperation agreement on 8/16/2018 that recognized the City's decision to opt in as an urban county participant. As such, the Consolidated Plan and AI is the responsibility of Northampton County and covers both entities. The City of Allentown is located in Lehigh County and is a federal CDBG, HOME, ESG, and HOPWA entitlement community.

Northampton County, Lehigh County, the City of Allentown, the City of Bethlehem, and the City of Easton previously prepared a Regional Analysis of Impediments to Fair Housing Choice in December 2014. On July 16, 2015, the U.S. Department of Housing and Urban Development (HUD) published its final rule on Affirmatively Furthering Fair Housing. This rule attempted to establish a standardized process for fair housing planning. On May 23, 2018, due to deficiencies in the requirements, information available, and public participation HUD announced the withdrawal of the AFFH Rule, eliminating the AFH Tool, and requiring communities to revert back to the preparation of an Analysis of Impediments to Fair Housing Choice (AI). This plan was prepared following HUD's Office of Fair Housing and Equal Opportunity's Fair Housing Planning Guide. Lehigh County did not participate in the BEAN partnership and prepared its own Analysis of Impediments to Fair Housing Choice in 2019.

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

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

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



The methodology employed to undertake this Analysis of Impediments included:

- **Research**

- Review of the 2014 Regional Analysis of Impediments to Fair Housing Choice, Zoning Ordinances, Comprehensive Plans, Five Year Consolidated Plans, Annual Action Plans, and Consolidated Annual Performance Evaluation Reports.
- Review of the Housing Authorities' Five Year and Annual PHA Plans.
- Review of the most recent demographic data for the area from the U.S. Census, which included general, demographic, housing, economic, social, and disability characteristics.
- Review of the U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (HUD-CHAS) data.
- Review of the residential segregation data.
- Review of financial lending institutions through the Home Mortgage Disclosure Act (HMDA) database.
- A review of the real estate and mortgage practices.
- Home mortgage foreclosure data.

- **Interviews & Meetings**

- Meetings and interviews were conducted with various City and County Departments; Housing Authorities; community, social service, and advocacy agencies, as well as public meetings.
- Follow up phone calls were made when an organization neither returned a survey nor attended a meeting.

- **Analysis of Data**

- Low- and moderate-income areas were identified and mapped.
- Concentrations of minority populations were identified and mapped.
- Concentrations of owner-occupied and renter-occupied housing units were identified and mapped.
- Fair housing awareness in the community was evaluated.
- Distribution by location of public and assisted housing units were analyzed and mapped.
- The location of CDBG, HOME, ESG, and HOPWA expenditures throughout the area were analyzed.
- Five Year Consolidated Plan Goals and Objectives were reviewed.

- **Potential Impediments**

- Public sector policies that may be viewed as impediments were analyzed.
- Private sector policies that may be viewed as impediments were analyzed.
- The status of previously identified impediments were analyzed.

- **Citizen Participation**

- A public survey was publicized by the various participating jurisdictions, public meetings were held, and copies of the draft AI were placed on public display to encourage citizen input.
- The public survey was available at the following link <https://www.surveymonkey.com/s/BEANA1> from May 1, 2019 until July 31, 2019.

- **Key Findings**

- The population in the Lehigh Valley is growing more rapidly than the Commonwealth of Pennsylvania's population growth.
- The median age in the urban areas of the Lehigh Valley is younger than the median age in the County and Commonwealth of Pennsylvania.



- The number of households has been decreasing in the urban areas while the population is growing and the number of households in the County has been increasing more rapidly than the population increase.
- The housing stock in the Lehigh Valley is older and in need of rehabilitation.
- There are areas of minority housing concentration that correspond to areas of lower income concentration.
- There are areas of renter-occupied housing (urban areas) and owner-occupied housing (non-urban areas) concentration.
- Communication issues exist for Limited English Proficiency (LEP) persons.
- Households incomes have increased at slower rates than housing costs.
- There are restrictive zoning provisions that discourage fair housing choice.
- There is a lack of new housing construction to meet housing demand.

The Bethlehem, Easton, Allentown, Northampton ("BEAN") Fair Housing Partnership's FY 2020 Analysis of Impediments to Fair Housing Choice has identified the following impediments, as well as defined specific goals and strategies to address each impediment. The following Impediments are specific to the local jurisdictions (excluding the housing authorities which are addressed under Impediment 6):

- **Impediment 1: Need for Fair Housing Education and Outreach**

There is a need to improve the knowledge and understanding concerning the rights and responsibilities of individuals, families, members of the protected classes, landlords, real estate professionals, and public officials under the Fair Housing Act (FHA).

**Goal:** Improve the public's knowledge and awareness of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing in the community.

**Strategies:** In order to meet this goal, the following actions should be undertaken:

- **1-A:** Educate residents of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **1-B:** Educate realtors, bankers, housing providers, and other real estate professionals of their responsibilities under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **1-C:** Educate policy makers and municipal staff about the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).

- **1-D:** Support fair housing organizations and legal advocacy groups to assist persons who may be victims of housing discrimination.
- **1-E:** Identify the language and communication needs of LEP persons to provide the specific language assistance that is required.

- **Impediment 2: Need for Affordable Housing**

In the Allentown-Bethlehem-Easton, PA-NJ Metro Area, over one out of every two (52.2%) renter households in the area is paying over 30% of their monthly incomes on housing costs. Nearly, one out of every three (29.5%) owner households with a mortgage is paying over 30% of their monthly income on housing costs. The number of households that are housing cost burdened significantly increases as household income decreases.

**Goal:** Increase the supply of decent, safe, and sanitary housing that is affordable and accessible through the new construction and rehabilitation of various types of housing, especially housing that is affordable to lower income households.

**Strategies:** In order to meet this goal, the following actions should be undertaken:

- **2-A:** Support and encourage private developers and non-profit housing providers to create, through construction or rehabilitation, affordable mixed-income housing.
- **2-B:** Support and encourage the rehabilitation of existing renter-occupied and owner-occupied housing units in the area for households below 80% AMI.
- **2-C:** Support homebuyer education, training programs, and closing cost/down payment assistance to increase the number of owner-occupied housing units.
- **2-D:** Support tenant education and maintenance training programs to encourage and support healthy rental housing units.
- **2-E:** Create a landlord marketing program to encourage lower income rental housing participation.
- **2-F:** Provide federal, state and local funding in response to HMDA data discrimination patterns to support higher loan to value ratios for minority homebuyers.

- **2-G:** Participate in the regional housing database of decent, safe, and sanitary housing that is affordable and accessible for households below 80% AMI.
- **2-H:** Create affirmative marketing procedures that include the development of community networks to attract protected classes that are least likely to apply for new affordable housing opportunities.

- **Impediment 3: Need for Accessible Housing**

There is a lack of accessible housing units in the area as the supply of accessible housing has not kept pace with the demand of individuals desiring to live independently.

**Goal:** Increase the supply of accessible housing through new construction and rehabilitation of accessible housing for persons with disabilities.

**Strategies:** In order to meet this goal, the following actions should be undertaken:

- **3-A:** Promote the need for accessible and visitable housing by supporting and encouraging private developers and non-profits to develop, construct, or rehabilitate housing that is accessible to persons with disabilities.
- **3-B:** Provide financial assistance for accessibility improvements to renter-occupied and owner-occupied housing units to enable seniors and persons with disabilities to remain in their homes.
- **3-C:** Promote and enforce the ADA and Fair Housing requirements for landlords to make “reasonable accommodations” to their rental properties so are accessible to tenants.
- **3-D:** Create affirmative marketing procedures that include the development of community networks to attract persons with disabilities that are least likely to apply for new affordable housing opportunities.

- **Impediment 4: Public Policy**

The local Zoning Ordinances need additional definitions and provisions concerning Fair Housing.

**Goal:** Revise local Zoning Ordinances to promote the development of various types of affordable housing throughout the area.

**Strategies:** In order to meet this goal, the following actions should be undertaken:

- **4-A:** Revise local Zoning Ordinances to include the Lehigh Valley Planning Commission's model zoning provisions.
- **4-B:** Adopt a written Reasonable Accommodation Policy for housing developers and the Planning/Zoning Commission to follow when reasonable accommodation requests are made concerning zoning and land use as it applies to protected classes under the Fair Housing Act.
- **4-C:** Develop financial incentives to encourage developers and housing providers to offer more affordable housing options in the area.
- **4-D:** Encourage LMI, minority, and protected class resident participation in the various local Boards and Commissions.
- **4-E:** Specific to the County; the County will provide support, including fair housing education, to local municipalities to update their Zoning Ordinances to encourage fair housing choice.

• **Impediment 5: Regional Approach to Fair Housing**

There is a need for a regional collaborative approach to affirmatively further fair housing in the area.

**Goal:** Form a regional cooperative fair housing consortium to affirmatively further fair housing in the area.

**Strategies:** In order to meet this goal, the following actions should be undertaken:

- **5-A:** Form a regional fair housing consortium to encourage fair housing choice throughout the area.
- **5-B:** Through the regional fair housing consortium create regional fair housing activities and projects.
- **5-C:** Create a database of decent, safe, and sanitary housing that is affordable and accessible for households below 80% AMI.
- **5-D:** Work collaboratively with affordable housing developers/providers to ensure affirmative fair marketing plans and deconcentration policies are created and implemented.
- **5-E:** Support (financially and structurally) the local housing authority to address, "Impediment 6: Housing Authority Fair Housing."

The following Impediment is specific to the local public housing authorities:

- **Impediment 6: Housing Authority Fair Housing**

There is a need to improve the knowledge and implementation of fair housing rights and responsibilities as it pertains to housing authority activities.

**Goal:** Improve the housing authorities' actions to affirmatively further fair housing in the area.

**Strategies:** In order to meet this goal, the following actions should be undertaken:

- **6-A:** Provide annual fair housing training to all housing authority employees and staff.
- **6-B:** Provide annual fair housing and landlord training to all landlords participating in their voucher program.
- **6-C:** Informational resources will be made available to housing authority residents concerning fair housing, especially reasonable accommodations.
- **6-D:** Identify the language and communication needs of LEP persons to provide the specific language assistance that is required.
- **6-E:** Create a local affordable housing development corporation to develop decent, safe, and sanitary housing that is affordable and accessible.
- **6-F:** Continue to rehabilitate and modernized existing public housing units.
- **6-G:** Partner with local jurisdictions to provide residential rehabilitation funding for participation or interested voucher landlords.
- **6-H:** Continue to encourage homeownership opportunities to housing authority residents through their Family Self-Sufficiency (FSS) programs.
- **6-I:** Promote Section 3 Opportunities (jobs and training) to housing authority residents.



## I. Introduction

HUD defines “fair housing choice” as:

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

A Fair Housing Analysis consists of the following six (6) conditions:

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

HUD-FHEO suggests that communities conducting a fair housing analysis consider the policies surrounding “visitability,” the Section 504 Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act. Housing that is “visitable” has the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor. “Visitable” housing has at least one accessible means of ingress/egress, and all interior and bathroom doorways have as a minimum a 32-inch clear opening. Section 504 of the Rehabilitation Act (24 CFR Part 8), known as “Section 504” prohibits discrimination against persons with disabilities in any program receiving Federal funds. The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments. The Fair Housing Act requires property owners to make reasonable modifications to units and/or public areas in order to allow a disabled tenant to make full use of the unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant full use of the unit. In regard to local zoning ordinances, the Fair Housing Act prohibits local government from making zoning or land use decisions, or

implementing land use policies that exclude or discriminate against persons of a protected class.

The participating entitlement communities previously prepared a Regional Analysis of Impediments to Fair Housing Choice in 2014. This Analysis of Impediments to Fair Housing Choice will outline progress that has been made since the previous Analysis of Impediments, explore the continuation of these impediments where necessary, and identify any new impediments to fair housing choice. Furthermore, this Analysis of Impediments will bring the participating entitlement communities into sequence with their FY 2019-2023 Five Year Consolidated Plans. The document is designed to act as a planning tool, providing the participating entitlement communities with the necessary framework to strategically reduce any identified impediments to fair housing choice over the next five (5) years, and continue to make modifications based on events and activities in the community during this time period.

In order to affirmatively further fair housing in the Lehigh Valley, the participating entitlement communities recognized that they must look beyond their jurisdictional boundaries and coordinate fair housing with other Lehigh Valley jurisdictions. Fair housing choice is the goal of the AI and the opportunity should be made available to low-income residents and the members of the protected classes to live anywhere in the Lehigh Valley.

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## II. Background Data

The Lehigh Valley is a Metropolitan Statistical Area containing the eastern Pennsylvania Counties of Carbon, Lehigh and Northampton and the western New Jersey County of Warren. The Lehigh Valley is the third most populous Metropolitan Statistical Area in the Commonwealth of Pennsylvania and the 64th most populated metropolitan area in the United States. The Lehigh Valley is named for the Lehigh River, a tributary of the Delaware River, and is designated a Pennsylvania Scenic River. The traditional bounds of the region are the Pocono Mountains to the north, the Delaware River to the east, the Berks County/Montgomery County to the southwest, and Bucks County to the south. The Lehigh Valley is located approximately 60 miles north of Philadelphia, 80 miles northeast of Harrisburg, and 90 miles west of New York City. The Lehigh Valley is known historically for its production of steel, Portland cement and apparel.

The Lehigh Valley's principal cities are Allentown, Bethlehem, and Easton. The City of Allentown is the largest city on the Lehigh Valley. The City of Allentown is located in the southeastern portion of Pennsylvania in Lehigh County and is the county seat. It is Pennsylvania's third most populous city and the 231st largest city in the United States. The City of Bethlehem is the county seat for Northampton County. The City of Easton is located west of the Delaware River and borders the State of New Jersey.

For this document, demographic, housing, economic, and social data was analyzed, including statistics from the 2000 and 2010 U.S. Census, 2009-2013 and 2013-2017 American Community Survey (ACS) Five-Year Estimates, 2009-2013 Comprehensive Housing Affordability Strategy (CHAS), Association of Religious Data, U.S. Department of Housing and Urban Development (HUD), HUD CPD Maps, HUD AFFH Tool, RealtyTrac, and the participation jurisdictions. All data sets used in the analysis are documented in the section the data is presented. This data was used to evaluate the area's community and housing characteristics as a basis for determining and identifying any existing impediments to fair housing choice.

### A. Population, Race, Ethnicity, and Religion:

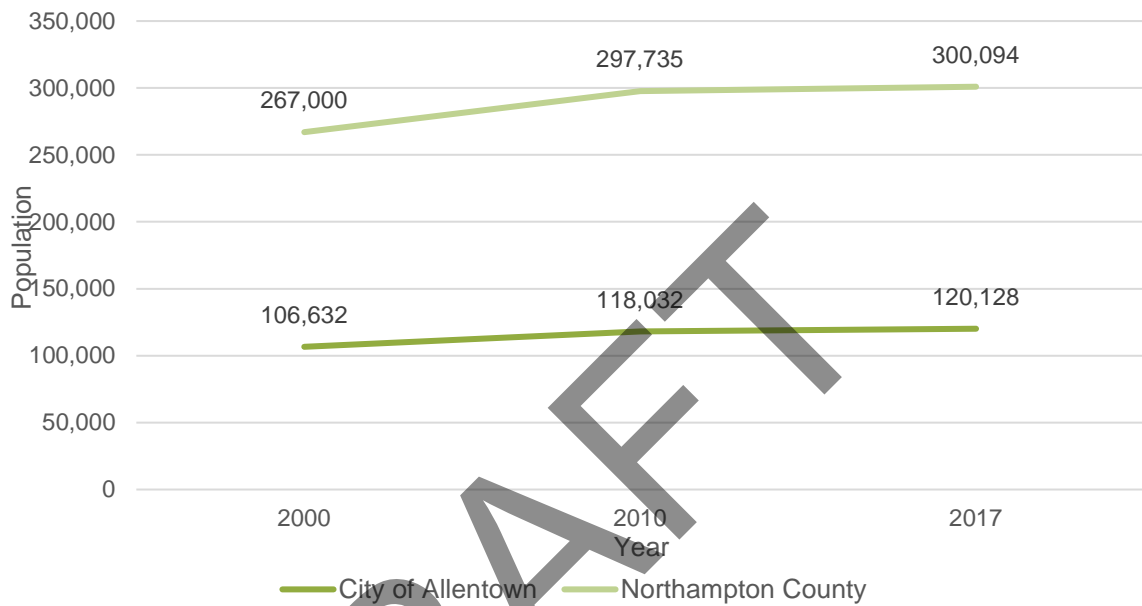
#### Population – Allentown

The City of Allentown's population increased from 106,632 people in 2000 to 118,032 in 2010 (an increase of 10.69%) and increased from 118,032 in 2010 to 120,128 people in 2017 (an increase of 1.78%).

Northampton County's population increased from 267,000 people in 2000 to 297,735 in 2010 (an increase of 11.51%) and increased from 297,735 in 2010 to 300,941 people in 2017 (an increase of 1.08%).

The Commonwealth of Pennsylvania's population increased from 12,281,054 people in 2000 to 12,612,705 in 2010 (an increase of 2.7%) and increased from 12,612,705 in 2010 to 12,790,505 people in 2017 (an increase of 1.41%).

### Population Change for the City of Allentown



Source: 2010 U.S. Census and 2013-2017 ACS

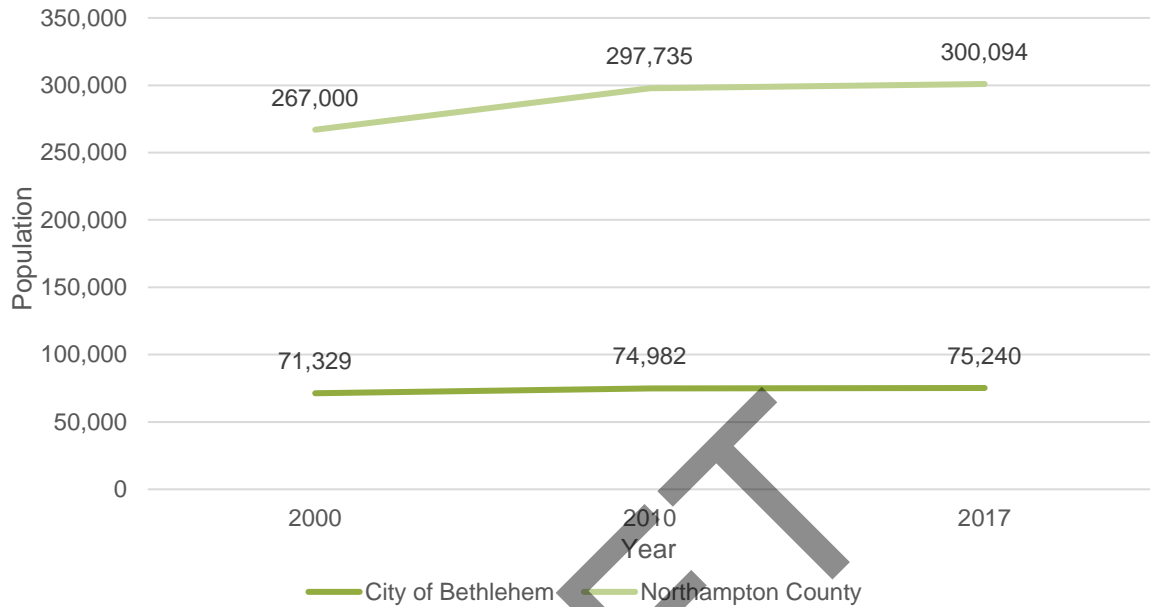
### Population – Bethlehem

The City of Bethlehem's population increased from 71,329 people in 2000 to 74,982 in 2010 (an increase of 5.12%) and increased from 74,982 in 2010 to 75,240 people in 2017 (an increase of 0.34%).

Northampton County's population increased from 267,000 people in 2000 to 297,735 in 2010 (an increase of 11.51%) and increased from 297,735 in 2010 to 300,941 people in 2017 (an increase of 1.08%).

The Commonwealth of Pennsylvania's population increased from 12,281,054 people in 2000 to 12,612,705 in 2010 (an increase of 2.7%) and increased from 12,612,705 in 2010 to 12,790,505 people in 2017 (an increase of 1.41%).

## Population Change for the City of Bethlehem



Source: U.S. Census Data (2000, 2010 and 2013 – 2017 ACS)

### Population – Easton

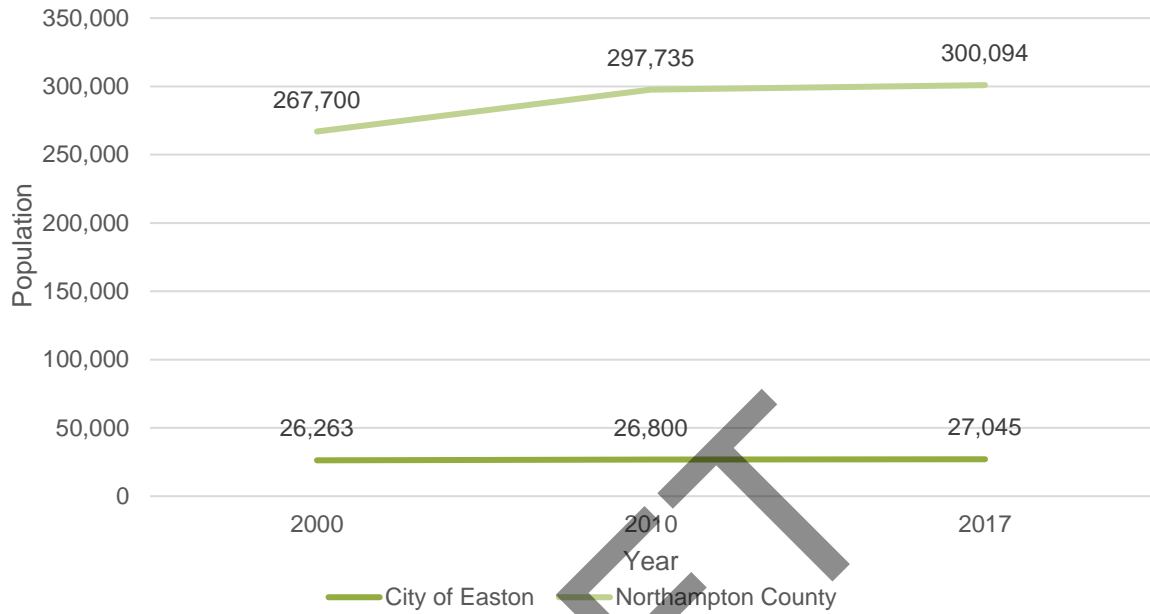
The City of Easton's population increased from 26,263 people in 2000 to 26,800 in 2010 (an increase of 2.04%) and increased from 26,800 in 2010 to 27,045 people in 2017 (an increase of 0.91%).

Northampton County's population increased from 267,000 people in 2000 to 297,735 in 2010 (an increase of 11.51%) and increased from 297,735 in 2010 to 300,941 people in 2017 (an increase of 1.08%).

The Commonwealth of Pennsylvania's population increased from 12,281,054 people in 2000 to 12,612,705 in 2010 (an increase of 2.7%) and increased from 12,612,705 in 2010 to 12,790,505 people in 2017 (an increase of 1.41%).



### Population Change for the City of Easton



Source: U.S. Census Data (2000, 2010 and 2013 – 2017 ACS)

### Race – Allentown

The following table highlights the racial composition of the City of Allentown as shown in the 2010 U.S. Census and in 2017.

#### Race and Hispanic or Latino Population in the City of Allentown

Race and Hispanic or Latino	2010 U.S. Census		2013-2017 ACS	
	#	%	#	%
Total	118,032	-	120,128	-
One Race	112,119	95.0%	114,618	95.4%
White Alone	69,061	58.5%	71,112	59.2%
Black or African American Alone	14,812	12.5%	16,914	14.1%
American Indian and Alaska Native Alone	893	0.8%	558	0.5%
Asian Alone	2,542	2.2%	2,559	2.1%
Native Hawaiian and Other Pacific Islander Alone	55	0.0%	102	0.1%

Some Other Race Alone	24,756	21.0%	23,373	19.5%
Hispanic or Latino	50,461	42.8%	60,800	50.6%

Source: 2010 U.S. Census and 2013-2017 ACS

The most common race identified in the City of Allentown in 2010 was White Alone with 69,061 residents comprising 58.5% of the population. The second most common race identified in the City of Allentown in 2010 was Some Other Race Alone with 24,756 residents comprising 21.0% of the population.

The most common race identified in the City of Allentown in 2017 was White Alone with 71,112 residents comprising 59.2% of the population. The second most common race identified in the City of Allentown in 2017 was Some Other Race Alone with 23,373 residents comprising 19.5% of the population.

It is notable that the percentage of Hispanic or Latino residents increased by 7.8% between 2010 and 2017 (50,461 persons, 42.8% in 2010 to 60,800 persons, 50.6% in 2017).

### Race – Bethlehem

The following table highlights the racial composition of the City of Bethlehem as shown in the 2010 U.S. Census and in 2017.

#### Race and Hispanic or Latino Population in the City of Bethlehem

Race and Hispanic or Latino	2010 U.S. Census		2013-2017 ACS	
	#	%	#	%
Total	74,982	-	75,240	-
One Race	72,422	96.6%	71,212	94.6%
White Alone	57,305	76.4%	59,196	78.7%
Black or African American Alone	5,199	6.9%	5,296	7.0%
American Indian and Alaska Native Alone	259	0.3%	267	0.4%
Asian Alone	2,143	2.9%	2,219	2.9%
Native Hawaiian and Other Pacific Islander Alone	31	0.0%	0	0.0%
Some Other Race Alone	7,485	10.0%	4,234	5.6%
Hispanic or Latino	18,268	24.4%	21,455	28.5%

Source: 2010 U.S. Census and 2013-2017 ACS

The most common race identified in the City of Bethlehem in 2010 was White Alone with 57,305 residents comprising 76.4% of the population. The second most common race identified in the City of Bethlehem in 2010 was Some Other Race Alone with 7,485 residents comprising 10.0% of the population.

The most common race identified in the City of Bethlehem in 2017 was White Alone with 59,196 residents comprising 78.7% of the population. The second most common race identified in the City of Bethlehem in 2017 was Black or African American Alone with 5,296 residents comprising 7.0% of the population.

It is notable that the percentage of Hispanic or Latino residents increased by 4.1% between 2010 and 2017 (18,268 persons, 24.4% in 2010 to 21,455 persons, 28.5% in 2017).

### Race – Easton

The following table highlights the racial composition of the City of Easton as shown in the 2010 U.S. Census and in 2017.

**Race and Hispanic or Latino Population in the City of Easton**

Race and Hispanic or Latino	2010 U.S. Census		2013-2017 ACS	
	#	%	#	%
Total	26,800	-	27,045	-
One Race	25,492	95.1%	25,125	92.9%
White Alone	17,997	67.2%	18,579	68.7%
Black or African American Alone	4,506	16.8%	4,063	15.0%
American Indian and Alaska Native Alone	106	0.4%	341	1.3%
Asian Alone	639	2.4%	879	3.3%
Native Hawaiian and Other Pacific Islander Alone	28	0.1%	29	0.1%
Some Other Race Alone	2,216	8.3%	1,234	4.6%
Hispanic or Latino	5,331	19.9%	5,873	21.7%

Source: 2010 U.S. Census and 2013-2017 ACS

The most common race identified in the City of Easton in 2010 was White Alone with 17,997 residents comprising 67.2% of the population. The second most

common race identified in the City of Easton in 2010 was Black or African American Alone with 4,506 residents comprising 16.8% of the population.

The most common race identified in the City of Easton in 2017 was White Alone with 18,579 residents comprising 68.7% of the population. The second most common race identified in the City of Easton in 2017 was Black or African American Alone with 4,063 residents comprising 15.0% of the population.

It is notable that the percentage of Hispanic or Latino residents increased by 1.8% between 2010 and 2017 (5,331 persons, 19.9% in 2010 to 5,873 persons, 21.7% in 2017).

### Race – Northampton

The following table highlights the racial composition of the County of Northampton as shown in the 2010 U.S. Census and in 2017.

**Race and Hispanic or Latino Population in the County of Northampton**

Race and Hispanic or Latino	2010 U.S. Census		2013-2017 ACS	
	#	%	#	%
Total	297,735	-	300,941	-
One Race	291,080	97.8%	291,302	96.8%
White Alone	256,895	86.3%	259,314	86.2%
Black or African American Alone	14,986	5.0%	16,204	5.4%
American Indian and Alaska Native Alone	609	0.2%	1,100	0.4%
Asian Alone	7,203	2.4%	8,328	2.8%
Native Hawaiian and Other Pacific Islander Alone	98	0.0%	53	0.0%
Some other race Alone	11,289	3.8%	6,303	2.1%
Hispanic or Latino	31,179	10.5%	37,343	12.4%

Source: 2010 U.S. Census and 2013-2017 ACS

The most common race identified in the County of Northampton in 2010 was White Alone with 256,895 residents comprising 86.3% of the population. The second most common race identified in the County of Northampton in 2010 was Black or African American Alone with 14,986 residents comprising 5.0% of the population.

The most common race identified in the County of Northampton in 2017 was White Alone with 259,314 residents comprising 86.2% of the population. The second most common race identified in the County of Northampton in 2010 was Black or African American Alone with 16,204 residents comprising of 5.4% of the population.

It is notable that the percentage of Hispanic or Latino residents increased by 1.9% between 2010 and 2017 (31,179 persons, 10.5% in 2010 to 37,343 persons, 12.4% in 2017).

### Ethnicity – Allentown

The following table highlights the ethnicities of Allentown residents as of 2010 and 2017.

**Ethnicity and Ancestry in the City of Allentown**

Ancestry	2006-2010 ACS		2013-2017 ACS	
	#	%	#	%
<b>Total Population</b>	<b>116,398</b>	<b>-</b>	<b>120,128</b>	<b>-</b>
Afghan	0	0.0%	0	0.0%
Albanian	126	0.1%	20	0.0%
Alsatian	9	0.0%	0	0.0%
American	3,325	2.9%	3,029	2.5%
Arab	3,073	2.6%	3,698	3.1%
Armenian	15	0.0%	50	0.0%
Assyrian/Chaldean/Syriac	20	0.0%	8	0.0%
Australian	120	0.1%	20	0.0%
Austrian	1,440	1.2%	981	0.8%
Basque	0	0.0%	0	0.0%
Belgian	20	0.0%	16	0.0%
Brazilian	43	0.0%	164	0.1%
British	217	0.2%	224	0.2%
Bulgarian	47	0.0%	9	0.0%
Cajun	0	0.0%	0	0.0%



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Canadian	64	0.1%	82	0.1%
Carpatho Rusyn	0	0.0%	0	0.0%
Celtic	0	0.0%	0	0.0%
Croatian	24	0.0%	38	0.0%
Cypriot	0	0.0%	0	0.0%
Czech	163	0.1%	151	0.1%
Czechoslovakian	338	0.3%	137	0.1%
Danish	57	0.0%	38	0.0%
Dutch	2,721	2.3%	1,452	1.2%
Eastern European	110	0.1%	171	0.1%
English	4,215	3.6%	2,436	2.0%
Estonian	0	0.0%	10	0.0%
European	264	0.2%	263	0.2%
Finnish	15	0.0%	17	0.0%
French (except Basque)	1,293	1.1%	1,057	0.9%
French Canadian	185	0.2%	177	0.1%
German	20,029	17.2%	14,238	11.9%
German Russian	0	0.0%	0	0.0%
Greek	573	0.5%	270	0.2%
Guyanese	79	0.1%	88	0.1%
Hungarian	1,829	1.6%	1,073	0.9%
Icelander	0	0.0%	0	0.0%
Iranian	56	0.0%	76	0.1%
Irish	8,860	7.6%	7,652	6.4%
Israeli	0	0.0%	10	0.0%
Italian	7,606	6.5%	5,397	4.5%
Latvian	0	0.0%	12	0.0%
Lithuanian	232	0.2%	323	0.3%
Luxemburger	11	0.0%	0	0.0%

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Macedonian	19	0.0%	0	0.0%
Maltese	0	0.0%	7	0.0%
New Zealander	0	0.0%	0	0.0%
Northern European	38	0.0%	8	0.0%
Norwegian	141	0.1%	68	0.1%
Pennsylvania German	4,292	3.7%	2,955	2.5%
Polish	3,566	3.1%	2,278	1.9%
Portuguese	136	0.1%	193	0.2%
Romanian	147	0.1%	72	0.1%
Russian	919	0.8%	781	0.7%
Scandinavian	1	0.0%	76	0.1%
Scotch-Irish	913	0.8%	243	0.2%
Scottish	970	0.8%	564	0.5%
Serbian	24	0.0%	0	0.0%
Slavic	13	0.0%	14	0.0%
Slovak	1,543	1.3%	1,366	1.1%
Slovene	73	0.1%	9	0.0%
Soviet Union	10	0.0%	0	0.0%
Subsaharan African	562	0.5%	1,075	0.9%
Swedish	502	0.4%	257	0.2%
Swiss	242	0.2%	144	0.1%
Turkish	53	0.0%	71	0.1%
Ukrainian	1,122	1.0%	784	0.7%
Welsh	1,050	0.9%	821	0.7%
West Indian (except Hispanic groups)	1,333	1.1%	1,736	1.4%
Yugoslavian	25	0.0%	22	0.0%
Other groups	56,336	48.4%	72,011	59.9%
Unclassified or not reported	8,417	7.2%	11,919	9.9%

Source: 2006-2010 ACS and 2013-2017 ACS

The most common specific ancestral group identified in the City of Allentown in 2010 was “German” with 20,029 residents comprising 17.2% of the population. The second most common specific ancestral group identified in the City of Allentown in 2010 was “Irish” with 8,860 residents comprising 7.6% of the population.

The most common specific ancestral group identified in the City of Allentown in 2017 was “German” with 14,238 residents comprising 11.9% of the population. The second most common specific ancestral group identified in the City of Allentown 2017 was “Irish” with 7,652 residents comprising 6.4% of the population.

The majority of respondents identified as, “Other Groups” and “Unclassified or Not Reported.” This classification accounted for 55.6% of the population in 2010 and 69.8% in 2017. The only notable change in proportional representation of the ancestral groups in the City of Allentown from 2010 to 2017 was the 5.3% decrease in the proportion of residents who identify as German (20,029 persons, or 17.2% in 2010 to 14,238 persons, or 11.9% in 2017).

### **Ethnicity – Bethlehem**

The following table highlights the ethnicities of Bethlehem residents as of 2010 and 2017.

**Ethnicity and Ancestry in the City of Bethlehem**

Ancestry	2006-2010 ACS		2013-2017 ACS	
	#	%	#	%
<b>Total Population</b>	<b>74,752</b>	<b>-</b>	<b>75,240</b>	<b>-</b>
Afghan	103	0.1%	0	0.0%
Albanian	0	0.0%	45	0.1%
Alsatian	0	0.0%	29	0.0%
American	1,759	2.4%	3,687	4.9%
Arab	564	0.8%	697	0.9%
Armenian	21	0.0%	37	0.0%
Assyrian/Chaldean/Syriac	8	0.0%	0	0.0%
Australian	9	0.0%	22	0.0%
Austrian	783	1.0%	482	0.6%

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Basque	12	0.0%	11	0.0%
Belgian	14	0.0%	26	0.0%
Brazilian	39	0.1%	192	0.3%
British	446	0.6%	283	0.4%
Bulgarian	10	0.0%	23	0.0%
Cajun	0	0.0%	0	0.0%
Canadian	147	0.2%	100	0.1%
Carpatho Rusyn	13	0.0%	0	0.0%
Celtic	11	0.0%	9	0.0%
Croatian	75	0.1%	169	0.2%
Cypriot	0	0.0%	0	0.0%
Czech	415	0.6%	211	0.3%
Czechoslovakian	166	0.2%	120	0.2%
Danish	97	0.1%	113	0.2%
Dutch	1,828	2.4%	1,343	1.8%
Eastern European	103	0.1%	157	0.2%
English	4,562	6.1%	3,922	5.2%
Estonian	0	0.0%	26	0.0%
European	487	0.7%	472	0.6%
Finnish	29	0.0%	74	0.1%
French (except Basque)	1,480	2.0%	1,129	1.5%
French Canadian	86	0.1%	136	0.2%
German	16,986	22.7%	15,111	20.1%
German Russian	0	0.0%	0	0.0%
Greek	657	0.9%	798	1.1%
Guyanese	173	0.2%	9	0.0%
Hungarian	3,458	4.6%	2,079	2.8%
Icelander	0	0.0%	0	0.0%
Iranian	64	0.1%	65	0.1%

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Irish	10,563	14.1%	8,904	11.8%
Israeli	0	0.0%	44	0.1%
Italian	8,252	11.0%	7,438	9.9%
Latvian	8	0.0%	23	0.0%
Lithuanian	430	0.6%	270	0.4%
Luxemburger	0	0.0%	0	0.0%
Macedonian	16	0.0%	6	0.0%
Maltese	0	0.0%	11	0.0%
New Zealander	14	0.0%	0	0.0%
Northern European	0	0.0%	30	0.0%
Norwegian	232	0.3%	174	0.2%
Pennsylvania German	2,599	3.5%	1,574	2.1%
Polish	3,725	5.0%	3,363	4.5%
Portuguese	625	0.8%	623	0.8%
Romanian	76	0.1%	34	0.0%
Russian	1,042	1.4%	773	1.0%
Scandinavian	22	0.0%	85	0.1%
Scotch-Irish	935	1.3%	452	0.6%
Scottish	1,079	1.4%	733	1.0%
Serbian	43	0.1%	100	0.1%
Slavic	80	0.1%	56	0.1%
Slovak	2,574	3.4%	2,032	2.7%
Slovene	316	0.4%	177	0.2%
Soviet Union	0	0.0%	0	0.0%
Subsaharan African	413	0.6%	601	0.8%
Swedish	556	0.7%	555	0.7%
Swiss	285	0.4%	208	0.3%
Turkish	184	0.2%	328	0.4%
Ukrainian	864	1.2%	734	1.0%

Welsh	1,433	1.9%	996	1.3%
West Indian (except Hispanic groups)	428	0.6%	738	1.0%
Yugoslavian	63	0.1%	0	0.0%
Other groups	23,637	31.6%	27,753	36.9%
Unclassified or not reported	5,152	6.9%	8,310	11.0%

Source: 2006-2010 ACS and 2013-2017 ACS

The most common specific ancestral group identified in the City of Bethlehem in 2010 was “German” with 16,986 residents comprising of 22.7% of the population. The second most common specific ancestral group identified in the City of Bethlehem in 2010 was “Irish” with 10,563 residents comprising of 14.1% of the population.

The most common specific ancestral group identified in the City of Bethlehem in 2017 was “German” with 15,111 residents comprising of 20.1% of the population. The second most common specific ancestral group identified in the City of Bethlehem 2017 was “Irish” with 8,904 residents comprising of 11.8% of the population.

The majority of respondents identified as, “Other Groups” and “Unclassified or Not Reported.” This classification accounted for 38.5% of the population in 2010 and 47.9% in 2017. There was not any change in proportional representation in the City of Bethlehem from 2010 to 2017 that was larger than 5.0 percentage points.

### **Ethnicity – Easton**

The following table highlights the ethnicities of Easton residents as of 2010 and 2017.

#### **Ethnicity and Ancestry in the City of Easton**

Ancestry	2006-2010 ACS		2013-2017 ACS	
	#	%	#	%
<b>Total Population</b>	26,902	-	27,045	-
Afghan	0	0.0%	0	0.0%
Albanian	0	0.0%	0	0.0%
Alsatian	0	0.0%	12	0.0%
American	1,439	5.3%	2,616	9.7%

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Arab	165	0.6%	417	1.5%
Armenian	8	0.0%	12	0.0%
Assyrian/Chaldean/Syriac	0	0.0%	0	0.0%
Australian	0	0.0%	14	0.1%
Austrian	100	0.4%	91	0.3%
Basque	9	0.0%	29	0.1%
Belgian	0	0.0%	0	0.0%
Brazilian	0	0.0%	20	0.1%
British	49	0.2%	41	0.2%
Bulgarian	0	0.0%	60	0.2%
Cajun	0	0.0%	0	0.0%
Canadian	41	0.2%	17	0.1%
Carpatho Rusyn	0	0.0%	0	0.0%
Celtic	0	0.0%	0	0.0%
Croatian	17	0.1%	5	0.0%
Cypriot	0	0.0%	0	0.0%
Czech	228	0.8%	106	0.4%
Czechoslovakian	22	0.1%	0	0.0%
Danish	13	0.0%	11	0.0%
Dutch	783	2.9%	446	1.6%
Eastern European	57	0.2%	131	0.5%
English	1,496	5.6%	1,335	4.9%
Estonian	0	0.0%	0	0.0%
European	149	0.6%	170	0.6%
Finnish	24	0.1%	19	0.1%
French (except Basque)	369	1.4%	339	1.3%
French Canadian	61	0.2%	75	0.3%
German	5,845	21.7%	4,974	18.4%
German Russian	0	0.0%	11	0.0%

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Greek	92	0.3%	146	0.5%
Guyanese	32	0.1%	62	0.2%
Hungarian	507	1.9%	537	2.0%
Icelander	0	0.0%	0	0.0%
Iranian	0	0.0%	0	0.0%
Irish	3,456	12.8%	3,101	11.5%
Israeli	0	0.0%	24	0.1%
Italian	3,632	13.5%	3,161	11.7%
Latvian	0	0.0%	31	0.1%
Lithuanian	100	0.4%	46	0.2%
Luxemburger	0	0.0%	0	0.0%
Macedonian	0	0.0%	6	0.0%
Maltese	0	0.0%	0	0.0%
New Zealander	0	0.0%	0	0.0%
Northern European	0	0.0%	3	0.0%
Norwegian	73	0.3%	113	0.4%
Pennsylvania German	711	2.6%	354	1.3%
Polish	1,144	4.3%	945	3.5%
Portuguese	46	0.2%	143	0.5%
Romanian	52	0.2%	112	0.4%
Russian	434	1.6%	203	0.8%
Scandinavian	0	0.0%	0	0.0%
Scotch-Irish	216	0.8%	121	0.4%
Scottish	325	1.2%	183	0.7%
Serbian	0	0.0%	21	0.1%
Slavic	8	0.0%	0	0.0%
Slovak	111	0.4%	117	0.4%
Slovene	0	0.0%	17	0.1%
Soviet Union	0	0.0%	0	0.0%



Subsaharan African	243	0.9%	143	0.5%
Swedish	299	1.1%	121	0.4%
Swiss	64	0.2%	83	0.3%
Turkish	0	0.0%	10	0.0%
Ukrainian	115	0.4%	201	0.7%
Welsh	272	1.0%	228	0.8%
West Indian (except Hispanic groups)	574	2.1%	312	1.2%
Yugoslavian	0	0.0%	0	0.0%
Other groups	9,593	35.7%	11,314	41.8%
Unclassified or not reported	2,670	9.9%	2,356	8.7%

The most common specific ancestral group identified in the City of Easton in 2010 was “German” with 5,854 residents comprising of 21.7% of the population. The second most common specific ancestral group identified in the City of Easton in 2010 was “Italian” with 3,632 residents comprising of 13.5% of the population.

The most common specific ancestral group identified in the City of Easton in 2017 was “German” with 4,974 residents comprising of 18.4% of the population. The second most common specific ancestral group identified in the City of Easton in 2017 was “Italian” with 3,632 residents comprising of 13.5% of the population.

The majority of respondents identified as, “Other Groups” and “Unclassified or Not Reported.” This classification accounted for 45.6% of the population in 2010 and 50.5% in 2017. There was not any change in proportional representation in the City of Easton from 2010 to 2017 that was larger than 5.0 percentage points.

### **Ethnicity – Northampton**

The following table highlights the ethnicities of Northampton residents as of 2010 and 2017.

#### **Ethnicity and Ancestry in the County of Northampton**

Ancestry	2006-2010 ACS		2013-2017 ACS	
	#	%	#	%
<b>Total Population</b>	294,536	-	300,941	-

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Afghan	48	0.0%	4	0.0%
Albanian	108	0.0%	65	0.0%
Alsatian	0	0.0%	41	0.0%
American	13,101	4.4%	19,240	6.4%
Arab	2,466	0.8%	2,234	0.7%
Armenian	151	0.1%	161	0.1%
Assyrian/Chaldean/Syriac	31	0.0%	20	0.0%
Australian	82	0.0%	68	0.0%
Austrian	3,315	1.1%	3,216	1.1%
Basque	59	0.0%	40	0.0%
Belgian	176	0.1%	115	0.0%
Brazilian	337	0.1%	164	0.1%
British	1,247	0.4%	1,098	0.4%
Bulgarian	103	0.0%	445	0.1%
Cajun	0	0.0%	2	0.0%
Canadian	527	0.2%	530	0.2%
Carpatho Rusyn	30	0.0%	7	0.0%
Celtic	0	0.0%	28	0.0%
Croatian	370	0.1%	455	0.2%
Cypriot	11	0.0%	0	0.0%
Czech	1,619	0.5%	1,075	0.4%
Czechoslovakian	683	0.2%	499	0.2%
Danish	471	0.2%	573	0.2%
Dutch	10,041	3.4%	7,312	2.4%
Eastern European	440	0.1%	678	0.2%
English	23,264	7.9%	19,727	6.6%
Estonian	105	0.0%	14	0.0%
European	1,869	0.6%	1,856	0.6%
Finnish	142	0.0%	323	0.1%

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French (except Basque)	5,181	1.8%	5,043	1.7%
French Canadian	683	0.2%	747	0.2%
German	87,044	29.6%	77,391	25.7%
German Russian	12	0.0%	62	0.0%
Greek	2,427	0.8%	1,654	0.5%
Guyanese	260	0.1%	236	0.1%
Hungarian	11,314	3.8%	9,541	3.2%
Icelander	0	0.0%	14	0.0%
Iranian	127	0.0%	130	0.0%
Irish	43,124	14.6%	40,781	13.6%
Israeli	59	0.0%	83	0.0%
Italian	45,169	15.3%	44,920	14.9%
Latvian	102	0.0%	93	0.0%
Lithuanian	1,185	0.4%	1,012	0.3%
Luxemburger	0	0.0%	0	0.0%
Macedonian	16	0.0%	12	0.0%
Maltese	0	0.0%	62	0.0%
New Zealander	30	0.0%	0	0.0%
Northern European	76	0.0%	79	0.0%
Norwegian	1,482	0.5%	1,328	0.4%
Pennsylvania German	14,088	4.8%	9,984	3.3%
Polish	17,349	5.9%	15,476	5.1%
Portuguese	1,877	0.6%	1,990	0.7%
Romanian	338	0.1%	433	0.1%
Russian	3,387	1.1%	3,813	1.3%
Scandinavian	166	0.1%	258	0.1%
Scotch-Irish	3,388	1.2%	1,961	0.7%
Scottish	4,300	1.5%	3,375	1.1%
Serbian	152	0.1%	186	0.1%

Slavic	411	0.1%	231	0.1%
Slovak	7,016	2.4%	6,764	2.2%
Slovene	412	0.1%	327	0.1%
Soviet Union	0	0.0%	0	0.0%
Subsaharan African	1,061	0.4%	1,062	0.4%
Swedish	1,823	0.6%	1,857	0.6%
Swiss	1,304	0.4%	902	0.3%
Turkish	460	0.2%	543	0.2%
Ukrainian	4,375	1.5%	4,000	1.3%
Welsh	6,030	2.0%	5,556	1.8%
West Indian (except Hispanic groups)	1,567	0.5%	2,529	0.8%
Yugoslavian	206	0.1%	238	0.1%
Other groups	54,311	18.4%	65,487	21.8%
Unclassified or not reported	21,046	7.1%	35,221	11.7%

Source: 2006-2010 ACS and 2013-2017 ACS

The most common specific ancestral group identified in the County of Northampton in 2010 was “German” with 87,044 residents comprising of 29.6% of the population. The second most common specific ancestral group identified in the County of Northampton in 2010 was “Italian” with 45,169 residents comprising of 15.3% of the population.

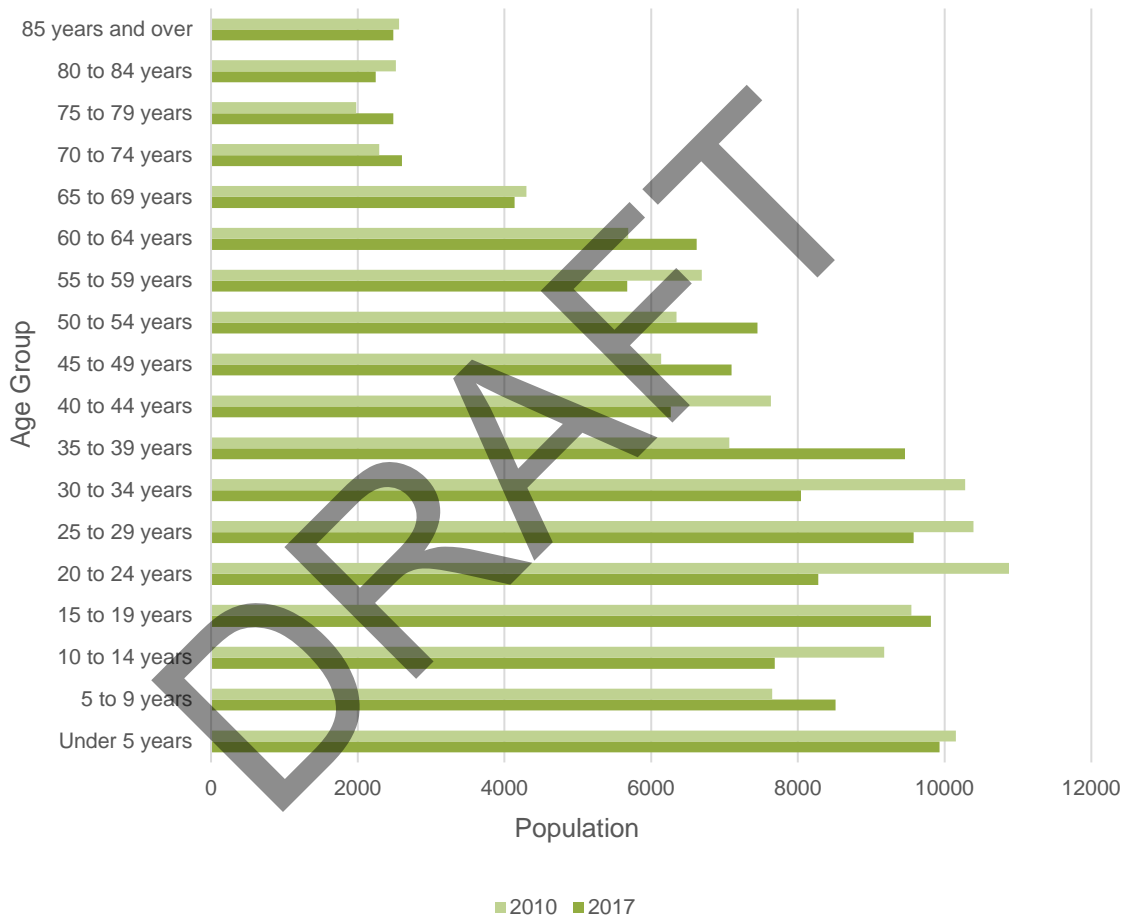
The most common specific ancestral group identified in the County of Northampton in 2017 was “German” with 77,391 residents comprising of 25.7% of the population. The second most common specific ancestral group identified in the County of Northampton 2017 was “Italian” with 44,920 residents comprising of 14.9% of the population.

The majority of respondents identified as, “Other Groups” and “Unclassified or Not Reported.” This classification accounted for 25.5% of the population in 2010 and 33.5% in 2017. There was not any change in proportional representation in the County of Northampton from 2010 to 2017 that was larger than 5.0 percentage points.

## Age – Allentown

The following chart illustrates age distribution in the City of Allentown at the time of the 2010 U.S. Census and 2013-2017 ACS. The Census shows that currently, children under 20 years of age represent 30.2% of the population; 38.2% of the population is between 20 and 45 years of age; 20.5% of the population is 45 to 65; and 11.2% of the population is 65 years of age and older.

### Age Distribution Change for the City of Allentown

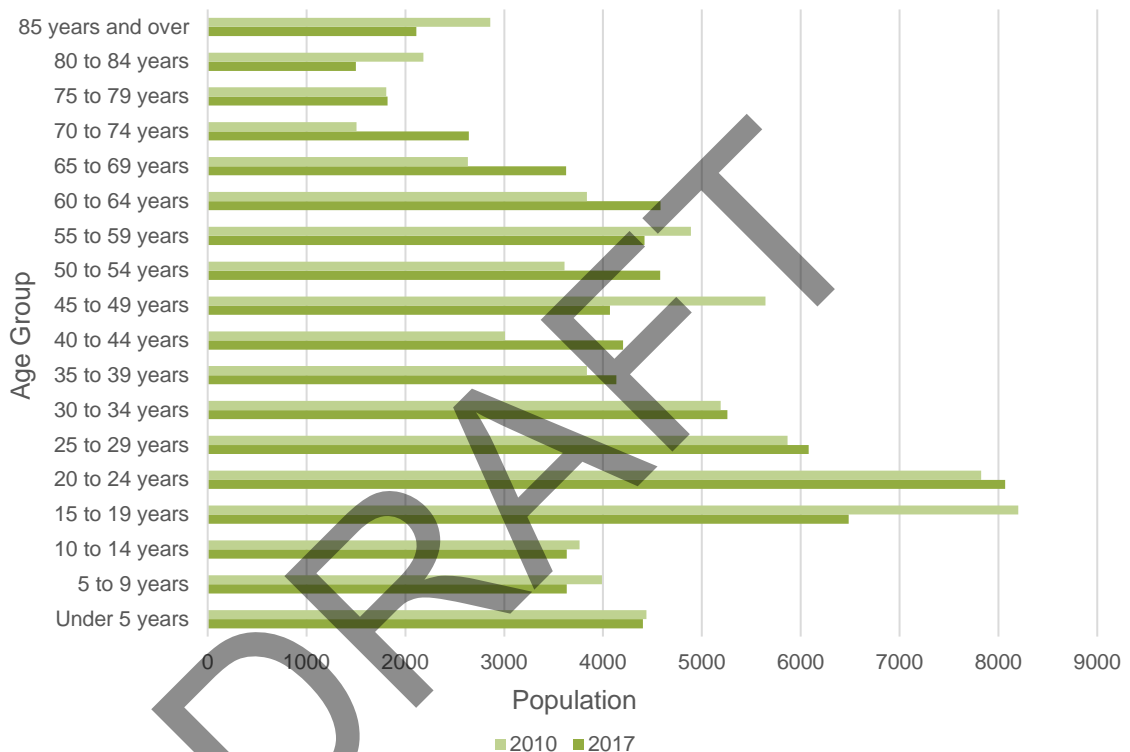


Source: 2010 U.S. Census and 2013-2017 ACS

## Age – Bethlehem

The following chart illustrates age distribution in the City of Bethlehem at the time of the 2010 U.S. Census and 2013-2017 ACS. The Census shows that currently, children under 20 years of age represent 24.1% of the population; 36.9% of the population is between 20 and 45 years of age; 23.5% of the population is 45 to 65; and 15.5% of the population is 65 years of age and older.

### Age Distribution Change for the City of Bethlehem

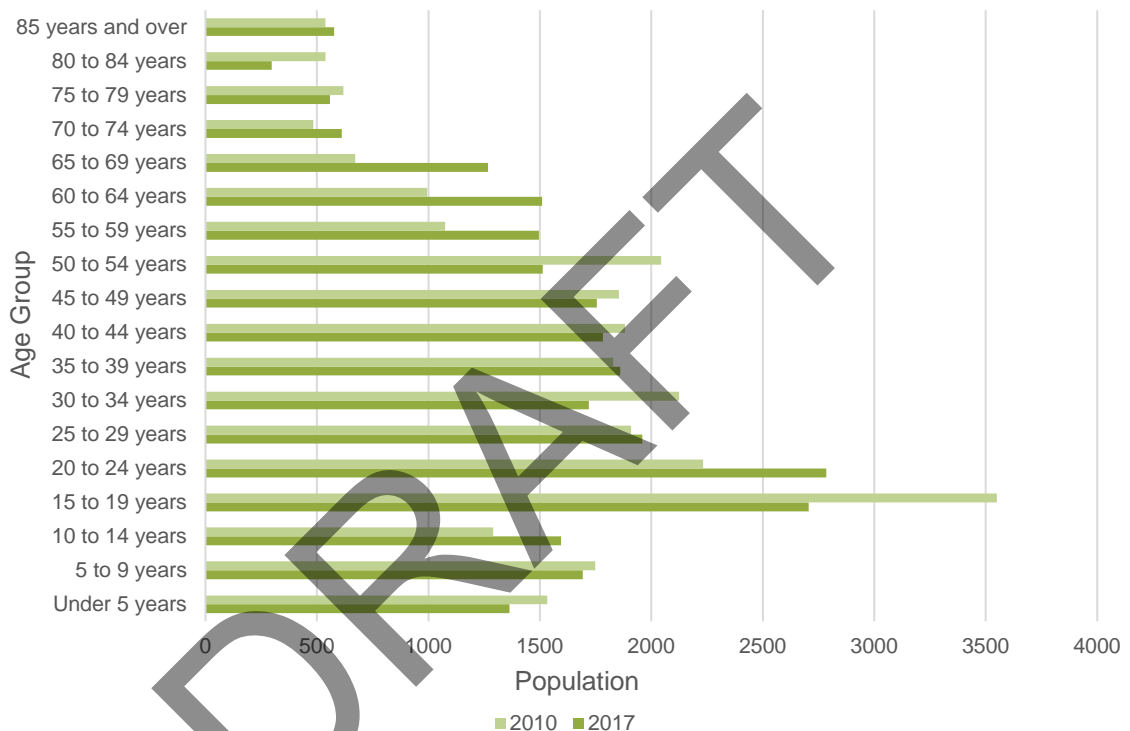


Source: 2010 U.S. Census and 2013-2017 ACS

## Age – Easton

The following chart illustrates age distribution in the City of Easton at the time of the 2010 U.S. Census and 2013-2017 ACS. The Census shows that currently, children under 20 years of age represent 27.2% of the population; 37.4% of the population is between 20 and 45 years of age; 23.2% of the population is 45 to 65; and 12.3% of the population is 65 years of age and older.

### Age Distribution Change for the City of Easton

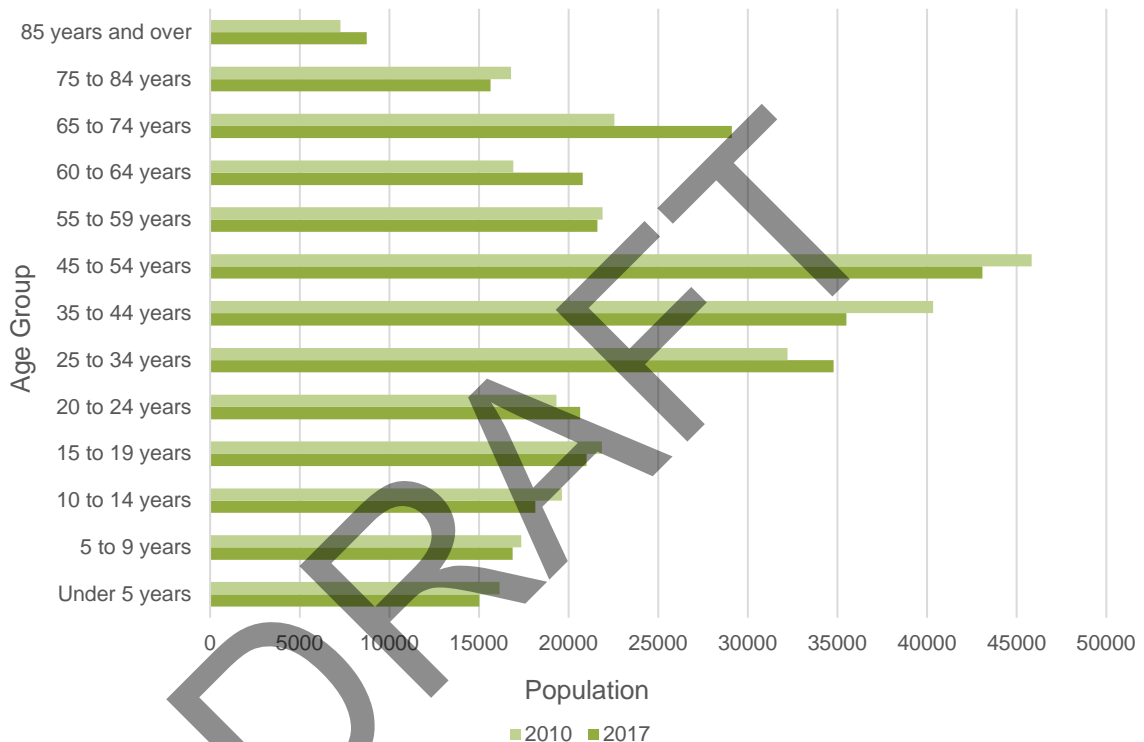


Source: 2010 U.S. Census and 2013-2017 ACS

## Age – Northampton

The following chart illustrates age distribution in the County of Northampton at the time of the 2010 U.S. Census and 2013-2017 ACS. The Census shows that currently, children under 20 years of age represent 23.6% of the population; 30.3% of the population is between 20 and 45 years of age; 28.4% of the population is 45 to 65; and 17.8% of the population is 65 years of age and older.

### Age Distribution Change for the County of Northampton



Source: 2010 U.S. Census and 2013-2017 ACS



## Religion – Allentown-Bethlehem-Easton, PA-NJ, Metropolitan Statistical Area

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

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

**Religious Affiliation in Northampton County**

	1980		1990		2000		2010	
	#	%	#	%	#	%	#	%
Evangelical Protestant	19,108	3.0%	25,216	3.7%	22,090	3.0%	44,186	5.4%
Black Protestant	556	0.1%	556	0.1%	0	0.0%	1,132	0.1%
Mainline Protestant	216,142	34.0%	197,190	28.7%	175,099	23.6%	145,769	17.8%
Catholic	187,653	29.5%	190,025	27.7%	230,329	31.1%	190,201	23.2%
Orthodox	840	0.1%	615	0.1%	7,959	1.1%	5,239	0.6%
Other	10,388	1.6%	10,400	1.5%	12,757	1.7%	24,795	3.0%
Total Adherents:	434,687	68.4%	424,002	61.7%	448,234	60.5%	411,322	50.0%
Unclaimed (% of total population)	200,794	31.6%	262,686	38.3%	292,161	39.5%	409,854	49.9%
<b>Total Population</b>	<b>635,481</b>	<b>-</b>	<b>686,688</b>	<b>-</b>	<b>740,395</b>	<b>-</b>	<b>821,173</b>	<b>-</b>

Source: The Association of Religion Data

The most common religious affiliation identified in the County of Northampton in 1980 was "Mainline Protestant" with 216,142 adherents comprising of 34.0% of the population. The second most common religious affiliation identified in the

County of Northampton in 1980 was “Unclaimed” with 200,794 non-adherents comprising of 31.6% of the population. The “Catholic” religious affiliation, although technically the third largest, should be noted as well as 187,653 adherents comprising of 29.5% of the population identified as “Catholic”.

The most common religious affiliation identified in the County of Northampton in 2010 was “Unclaimed” with 409,854 non-adherents comprising of 49.9% of the population. The second most common religious affiliation identified in the County of Northampton in 2010 was “Catholic” with 190,201 adherents comprising of 23.2% of the population. The “Mainline Protestant” religious affiliation, although technically the third largest, should be noted as well as 145,769 adherents comprising of 17.8% of the population identified as “Mainline Protestant”.

There were three changes in proportional representation of the religious groups in the County of Northampton from 1980 to 2010 that were larger than 5.0 percentage points. First, there was a 18.3% increase in the number of residents who identify as “Unclaimed” which included 200,764 persons, or 31.6%, in 1980 to 409,854 persons, or 49.9%, in 2010. Second, there was a 16.3% decrease in the number of residents who identify as “Mainline Protestant” which included 216,142 persons, or 34.0% in 1980 to 145,769 persons, or 17.8%, in 2010. Third, there was a 6.4% decrease in the number of residents who identify as “Catholic” which included 187,653 persons, or 29.5%, in 1980 to 190,201 persons, or 23.2%, in 2010. It is important to note that although the nominal number of “Catholics” in Northampton County increased from 1980 to 2010, the percentage of Northampton County residents who identify as “Catholic” decreased.

## B. Households:

The following table highlights the changes in the number of households and population in the area over the past seventeen (17) years.

Year	HOUSEHOLDS		POPULATION	
	#	Change	#	Change
<b>Allentown</b>				
2000	42,032	-	106,632	-
2010	44,013	4.7%	118,032	10.7%
2017	41,935	-4.7%	120,128	1.8%
<b>Bethlehem</b>				

2000	28,116	-	71,329	-
2010	29,349	4.4%	74,982	5.1%
2017	28,936	-1.4%	75,240	0.3%
<b>Easton</b>				
2000	9,544	-	26,263	-
2010	9,226	-3.3%	26,800	2.0%
2017	9,521	3.2%	27,045	0.9%
<b>Northampton</b>				
2000	101,541	-	267,700	-
2010	111,706	10.0%	297,735	11.2%
2017	113,827	1.9%	300,094	0.8%

Source: 2000 U.S. Census, 2010 U.S. Census, and 2013-2017 ACS

### Household Tenure – Allentown

According to the 2000 U.S. Census, there were 45,960 housing units in the City of Allentown. Of these housing units, 42,032 (91.5%) were occupied and 3,928 (5.6%) were unoccupied. Of the occupied housing units, 22,284 (53.0%) were owner-occupied and 19,748 (47.0%) were renter-occupied.

According to the 2010 U.S. Census, the total number of housing units increased to 46,921; a 2.1% increase. Of the total housing units, 42,804 (91.2%) units were occupied and 4,117 (8.8%) were unoccupied. Of the occupied housing units in 2010, 20,730 (48.4%) were owner-occupied and 22,074 (51.6%) were renter-occupied. The increase in housing units between 2000 and 2010 was 961 units.

According to the 2017 ACS 5-Year estimates, there were 45,790 housing units in the City of Allentown; a 2.4% decrease. Of the total housing units, 41,935 (91.6%) were occupied and 3,855 (8.4%) were unoccupied. Of the occupied housing units, 18,195 (43.4%) were owner-occupied and 23,740 (56.6%) were renter-occupied. From 2010 to 2017 there was: a 1,131 unit decrease in the total number of housing units; a 869 unit decrease (2.6%) in the number of occupied units; and a 262 unit decrease (6.4%) in the number of unoccupied housing units. The number of owner-occupied units decreased by 2,535 units (12.2%) and the number of renter-occupied units increased by 1,666 (7.5%).

The maps below illustrate the concentrations of owner-occupied and renter-occupied housing units. Higher concentrations of a particular housing type are accentuated by a darker color. In Allentown, owner-occupied units increase

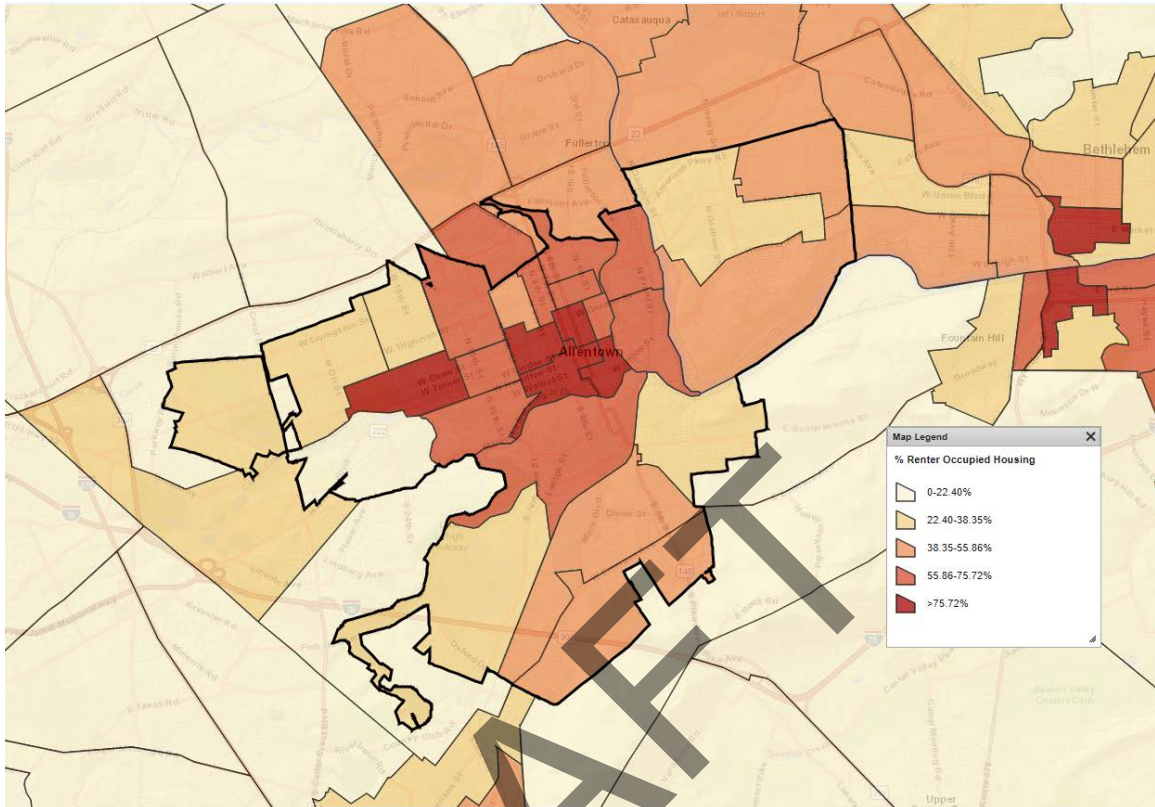
towards the outskirts of the city and renter-occupied units increase towards the city center.

### Percentage Owner-Occupied Housing



Source: HUD CPD Maps

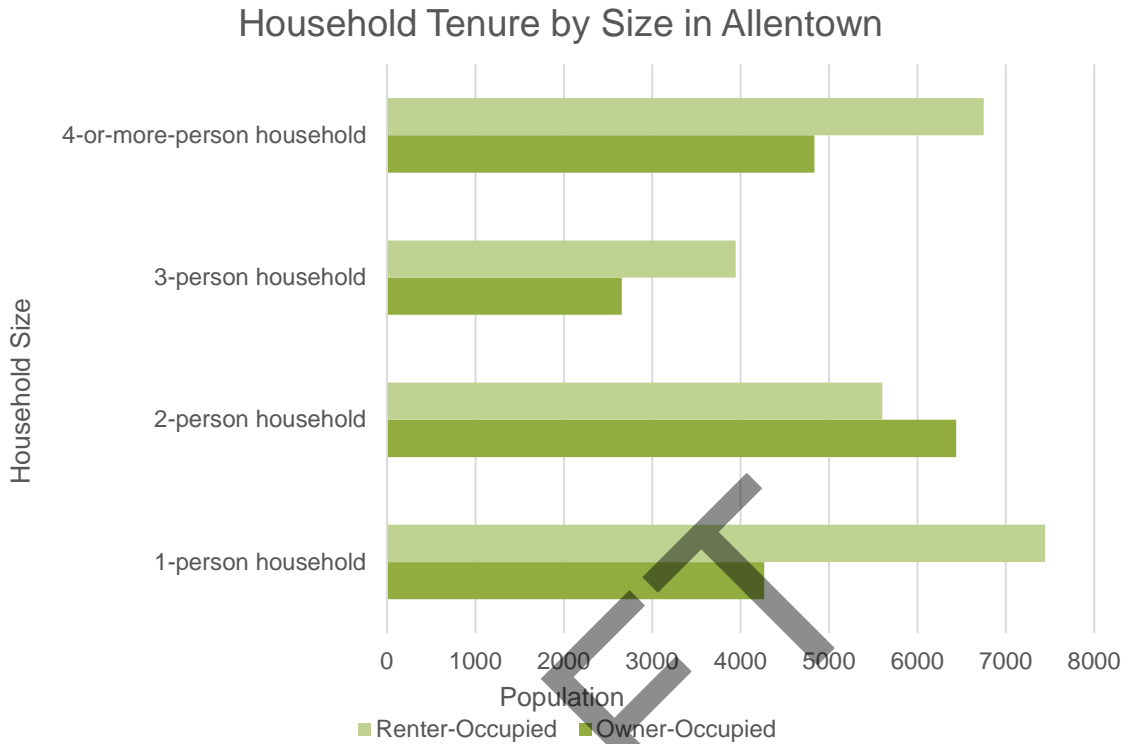
## Percentage Renter-Occupied Housing



Source: HUD CPD Maps

In 2000, the average household size was 2.42 persons and the average family size was 3.09 persons. In 2010, the average household size was 2.64 persons and the average family size was 3.29 persons. In 2017, the average household size was 2.74 persons and the average family size was 3.36 persons.





Source: 2013-2017 ACS

Significant household shifts in Allentown included the 2,535 unit decrease in owner-occupied units from 2010 to 2017 and the 1,666 unit increase in renter-occupied units from 2010 to 2017. Family and household sizes have increased since 2000. While owner-occupancy rates are declining, for an urban city, there still is a healthy balance between owner-occupied and renter-occupied housing units. The number of households has been declining over the past 17 years at the same time as the population has increased. The decrease in households and increase in population has put more housing supply pressure on the renter-occupied housing market.

### Household Tenure – Bethlehem

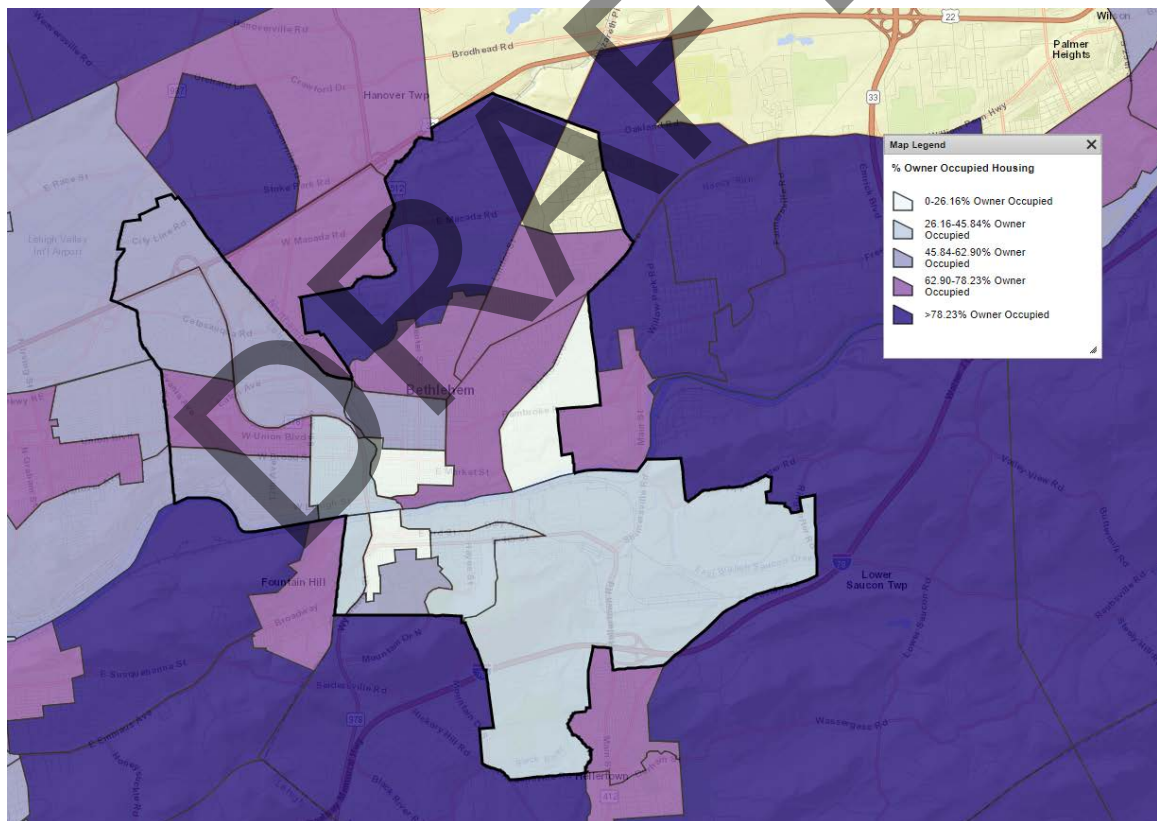
According to the 2000 U.S. Census, there were 29,631 housing units in the City of Bethlehem. Of these housing units, 28,116 (94.9%) were occupied and 1,515 (5.1%) were unoccupied. Of the occupied housing units, 16,327 (58.1%) were owner-occupied and 11,789 (41.9%) were renter-occupied.

According to the 2010 U.S. Census, the total number of housing units increased to 31,221; a 5.4% increase. Of the total housing units, 29,365 (94.1%) were occupied and 1,856 (5.9%) were unoccupied. Of the occupied housing units in 2010, 15,727 (53.6%) were owner-occupied and 13,638 (46.4%) were renter-occupied. The increase in housing units between 2000 and 2010 was 1,590 units.

According to the 2017 ACS 5-Year estimates, there were 31,260 housing units in the City of Bethlehem; a 0.1% increase. Of the total housing units, 28,936 (92.6%) were occupied and 2,324 (7.4%) were unoccupied. Of the occupied housing units, 14,955 (51.7%) were owner-occupied and 13,981 (48.3%) were renter-occupied. From 2010 to 2017 there was: a 39 unit increase in the total number of housing units; a 429 unit decrease (1.5%) in the number of occupied units; and a 468 unit increase (25.2%) in the number of unoccupied housing units. The number of owner-occupied units decreased by 772 units (4.9%) and the number of renter-occupied units increased by 343 (2.5%).

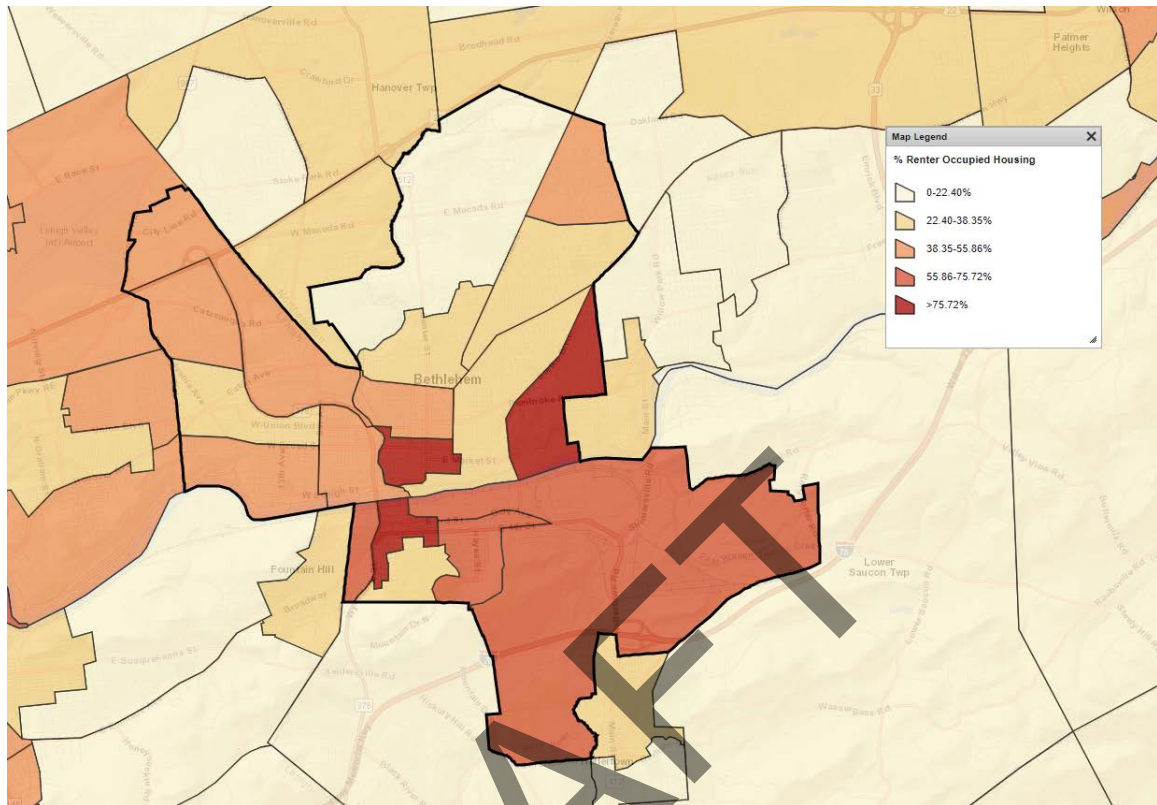
The maps below illustrate the concentrations of owner-occupied and renter-occupied housing units. Higher concentrations of a particular housing type are accentuated by a darker color. In Bethlehem, owner-occupied units are more prevalent in the northern and outlying areas of the city and renter-occupied units are more prevalent in the southern and city center.

### Percentage Owner-Occupied Housing



Source: HUD CPD Maps

## Percentage Renter-Occupied Housing



Source: HUD CPD Maps

In 2000, the average household size was 2.34 persons and the average family size was 2.95 persons. In 2010, the average household size was 2.31 persons and the average family size was 2.95 persons. In 2017, the average household size was 2.39 persons and the average family size was 3.07 persons.





Source: 2013-2017 ACS

Family and household sizes have remained relatively constant since 2000 but the number of households and residents has increased since 2000. Owner-occupancy rates are declining and renter-occupancy rates are increasing. The current ratio is close to 1 for 1 and for an urban city, this ratio represents a healthy balance between owner-occupied and renter-occupied housing units. The number of housing units has remained relatively stable over the past 17 years while households and residents have increased in the area applying housing supply pressure to both the owner-occupied and renter-occupied housing market.

### Household Tenure – Easton

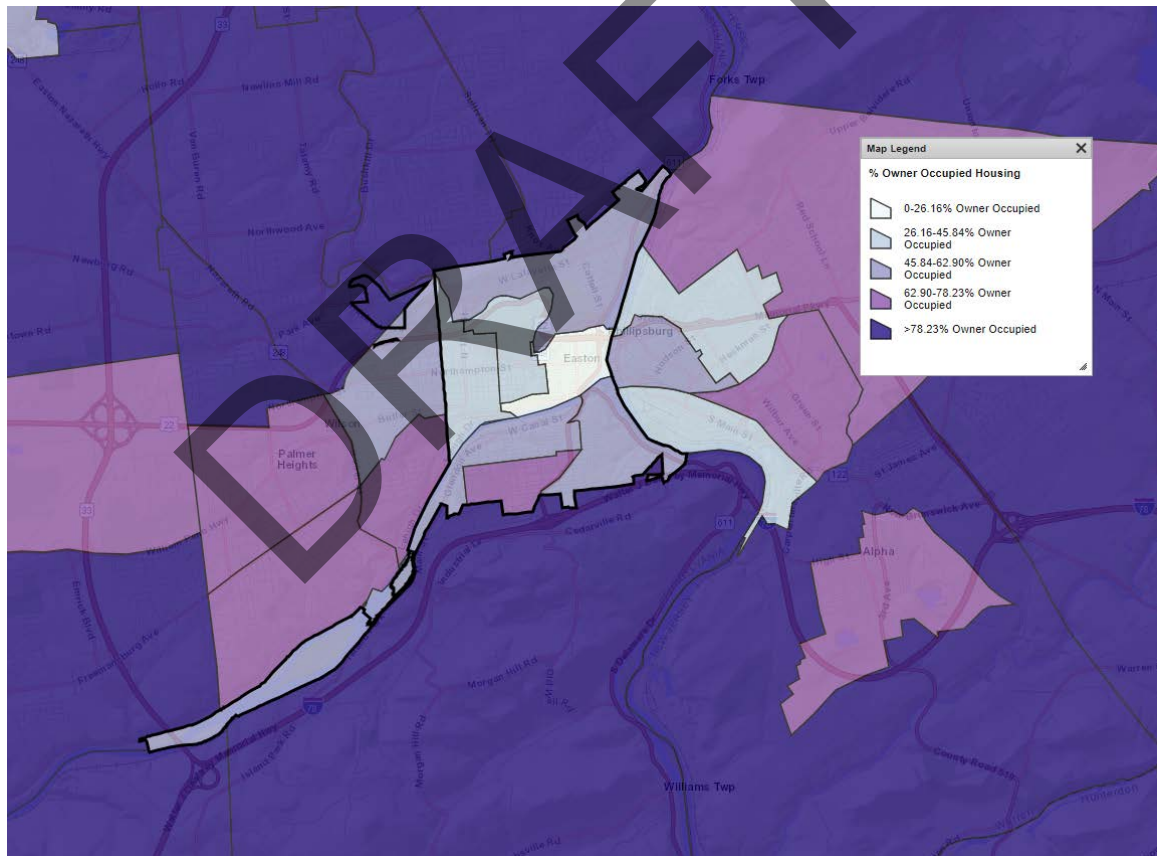
According to the U.S. Census for 2000, there were 10,545 housing units in the City of Easton. Of these housing units, 9,544 (90.5%) were occupied and 1,001 (9.5%) were unoccupied. Of the occupied housing units, 4,632 (48.5%) were owner-occupied and 4,912 (51.5%) were renter-occupied.

According to the 2010 U.S. Census, the total number of housing units decreased to 10,356, a 1.8% decrease. Of the total housing units, 9,307 (89.9%) were occupied and 1,049 (10.1%) were unoccupied. Of the occupied housing units in 2010, 4,325 (46.5%) were owner-occupied and 4,982 (53.5%) were renter-occupied. The decrease in housing units between 2000 and 2010 was 189 units.

According to the 2017 ACS 5-Year estimates, there were 11,125 housing units in the City of Easton; a 1.1% increase. Of the total housing units, 9,521 (85.6%) were occupied and 1,604 (14.4%) were unoccupied. Of the occupied housing units, 4,326 (45.4%) were owner-occupied and 5,195 (54.6%) were renter-occupied. From 2010 to 2017 there was: a 769 unit increase in the total number of housing units; a 214 unit increase (4.3%) in the number of occupied units; and a 555 unit increase (4.3%) in the number of unoccupied housing units. The number of owner-occupied units increased by 1 unit (0.0%) and the number of renter-occupied units increased by 213 (4.3%).

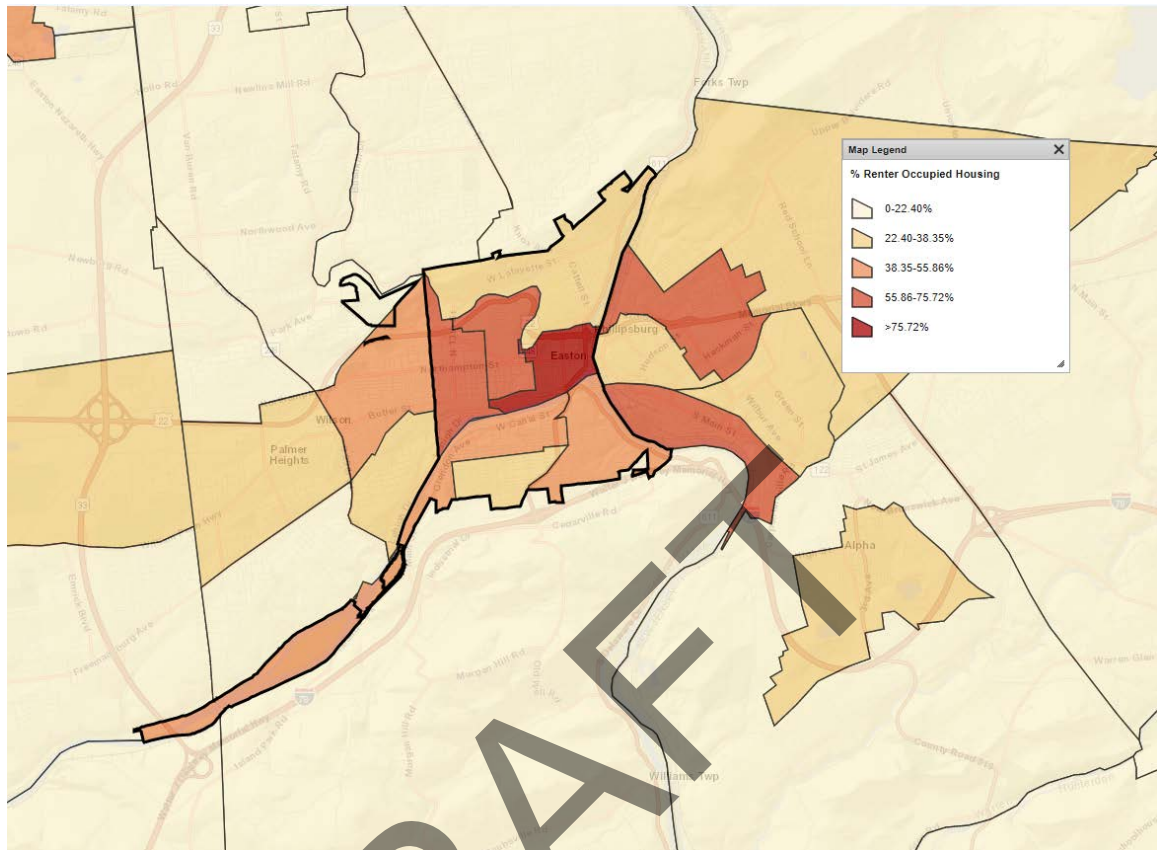
The maps below illustrate the concentrations of owner-occupied and renter-occupied housing units. Higher concentrations of a particular housing type are accentuated by a darker color. In Easton, owner-occupied units are most prevalent in the northern and southern sections of the city and renter-occupied units are most prevalent in the city center.

### Percentage Owner-Occupied Housing



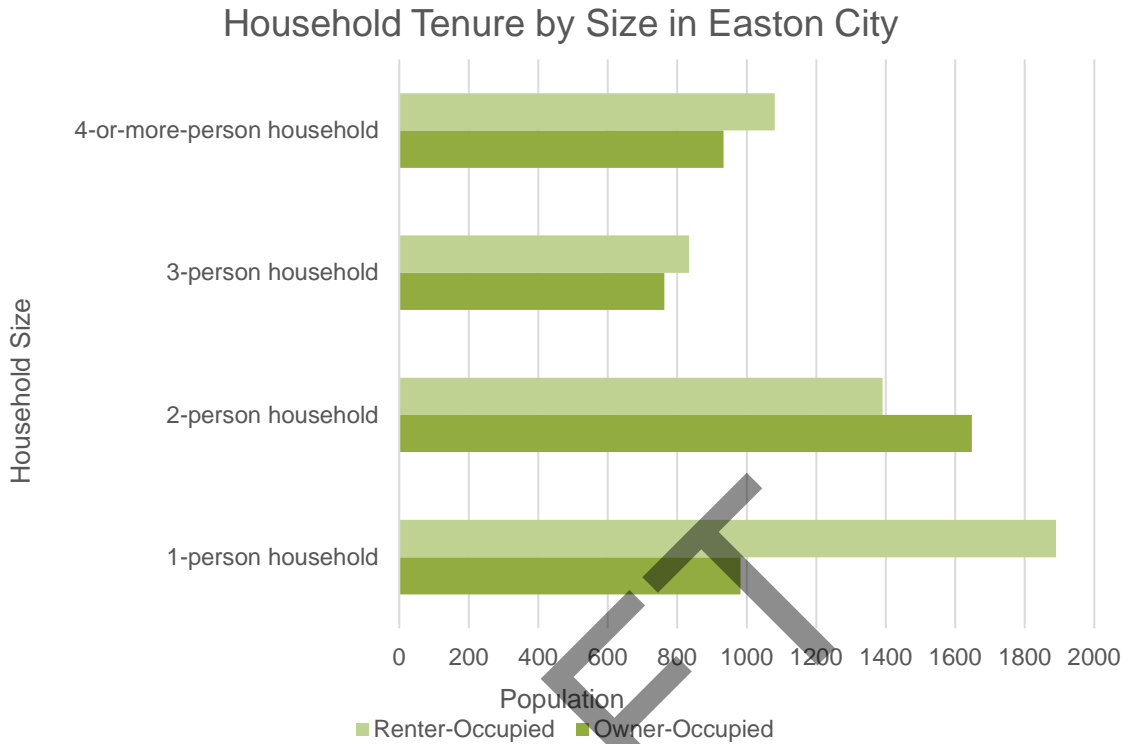
Source: HUD CPD Maps

## Percentage Renter-Occupied Housing



Source: HUD CPD Maps

In 2000, the average household size was 2.46 persons and the average family size was 3.10 persons. In 2010, the average household size was 2.55 persons and the average family size was 3.20 persons. In 2017, the average household size was 2.48 persons and the average family size was 3.14 persons.



Source: 2013-2017 ACS

The number of housing units in the City of Easton has increased slightly since 2000. Family and household sizes have remained relatively stable since 2000. Owner-occupancy rates have been declining while renter-occupancy rates have increased. The current ratio is still close to 1:1. Of note, the amount of unoccupied housing units has increased by 60.2% (from 1,001 units to 1,604 units) since 2000.

### Household Tenure – Northampton County

According to the U.S. Census for 2000, there were 106,710 housing units in Northampton County. Of these housing units, 101,541 (95.2%) were occupied and 5,169 (4.8%) were unoccupied. Of the occupied housing units, 74,464 (73.3%) were owner-occupied and 27,077 (26.7%) were renter-occupied.

According to the 2010 U.S. Census, the total number of housing units increased to 120,363; a 12.8% increase. Of the total housing units, 113,565 (94.4%) were occupied and 6,798 (5.6%) were unoccupied. Of the occupied housing units in 2010, 82,719 (72.8%) were owner-occupied and 30,846 (27.2%) were renter-occupied. The increase in housing units between 2000 and 2010 was 13,653 units.

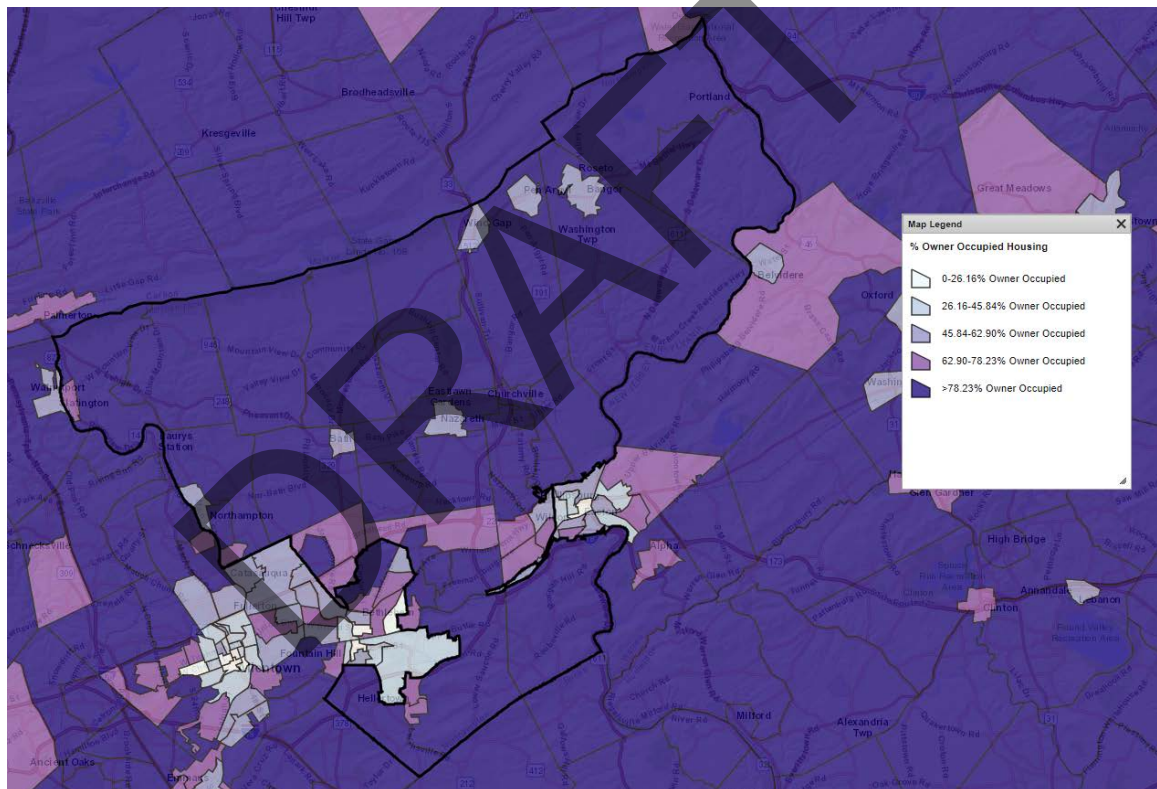
According to the 2017 ACS 5-Year estimates, there were 122,452 housing units in Northampton County; a 1.7% increase. Of the total housing units, 113,827 (93.0%) were occupied and 8,625 (7.0%) were unoccupied. Of the occupied



housing units, 81,540 (72.8%) were owner-occupied and 32,287 (28.4%) were renter-occupied. From 2010 to 2017 there was a 2,089 unit increase in the total number of housing units, a 262 unit increase (0.2%) in the number of occupied units, and a 1,827 unit increase (26.9%) in the number of unoccupied housing units. The number of owner-occupied units decreased by 1,179 units (1.4%) and the number of renter-occupied units increased by 1,441 (4.7%).

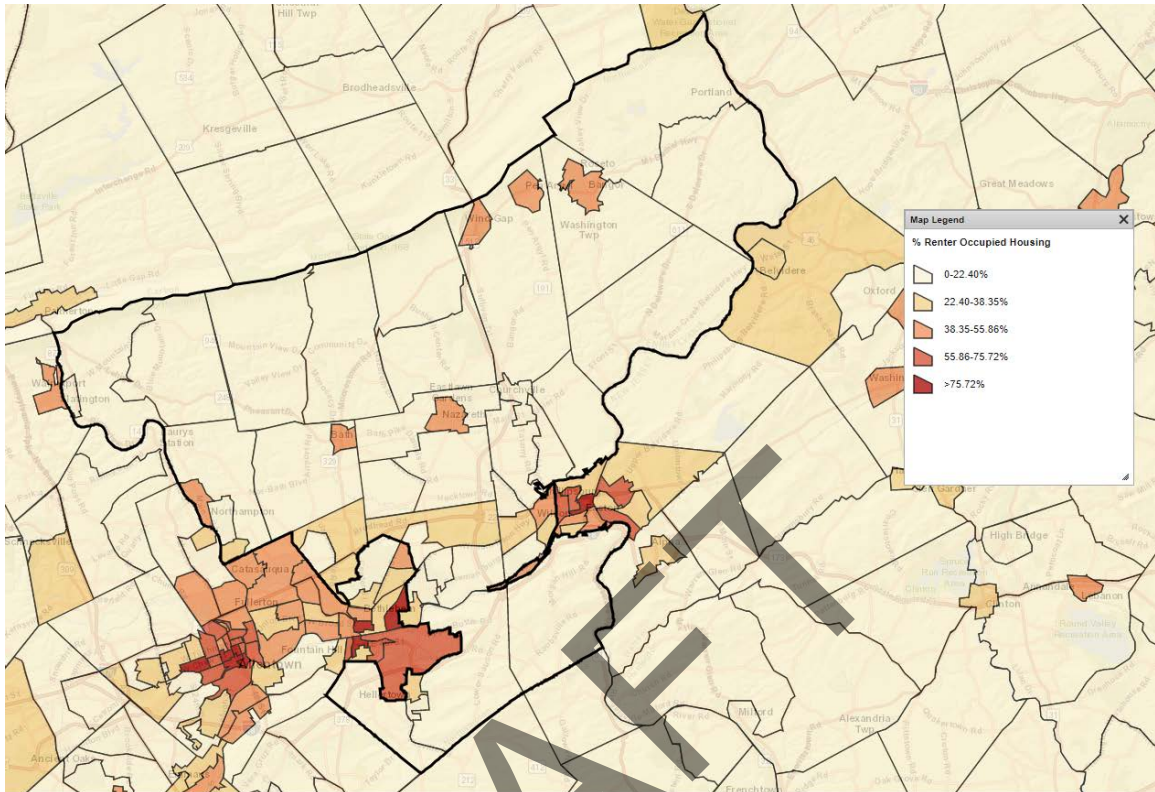
The maps below illustrate the concentrations of owner-occupied and renter-occupied housing units. Higher concentrations of a particular housing type are accentuated by a darker color. In Northampton County, owner-occupied units are most prevalent in the rural areas and renter-occupied units are most prevalent in the urban areas and along the Rt. 22 and Hwy 78 corridor between Allentown and Easton.

### Percentage Owner-Occupied Housing



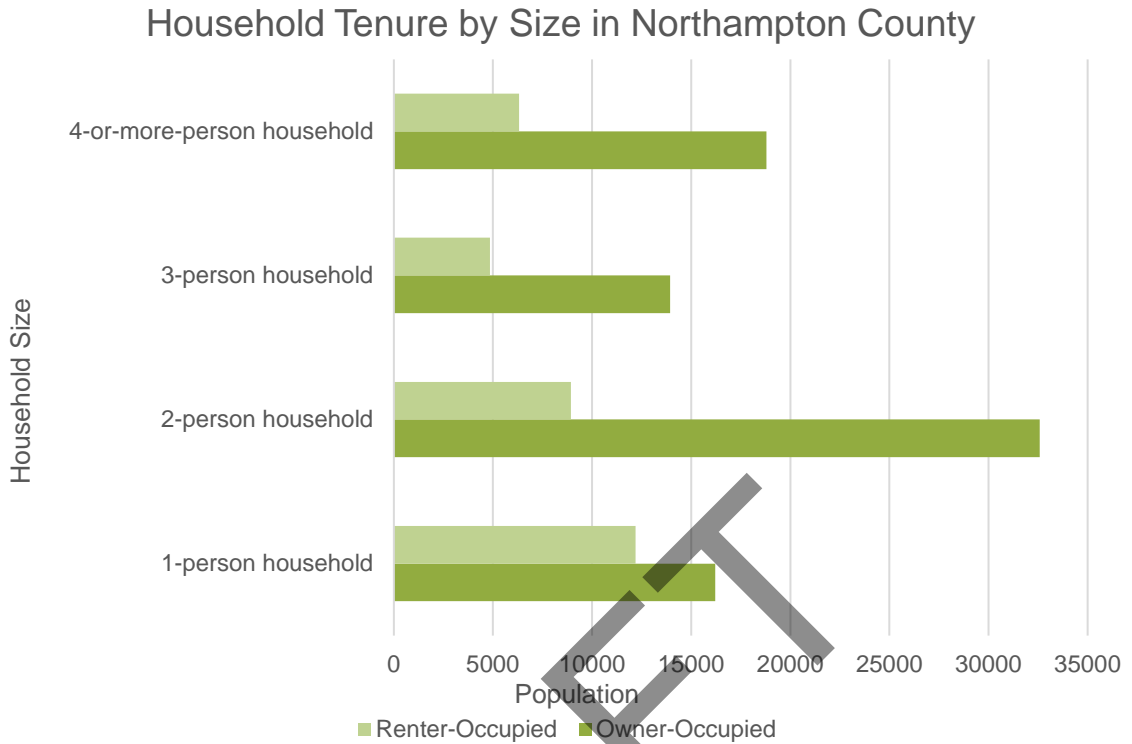
Source: HUD CPD Maps

## Percentage Renter-Occupied Housing



Source: HUD CPD Maps

In 2000, the average household size was 2.53 persons and the average family size was 3.02 persons. In 2010, the average household size was 2.52 persons and the average family size was 3.00 persons. In 2017, the average household size was 2.55 persons and the average family size was 3.05 persons.



Source: 2013-2017 ACS

The number of housing units in Northampton County increased by 15% since 2000. Family and household sizes have remained relatively stable since 2000. Owner-occupancy and renter-occupancy rates have also remained level since 2000. The ratio of owner-occupied to renter-occupied housing units is 3:1. Homeownership rates are traditionally higher in rural areas. Across the northeastern United States, rates are around 80%. The percentage of owner-occupied housing units in the County is within this average rate. Of note, the amount of unoccupied housing units has increased by 66.9% (from 5,169 units to 8,625 units) since 2000.

### Household Tenure by Race and Ethnicity – Allentown

The table below compares homeowners and renters by race and ethnicity in Allentown. White households represent 65.5% of all households, 75.8% of homeowners, and 57.7% of renters. Black or African American households represent 13.0% of all households, 7.6% of homeowners, and 17.1% of renters. Hispanic or Latino households represent 41.2% of all households, 28.5% of homeowners, and 51.0% of renters.

**Household Tenure by Race and Ethnicity in the City of Allentown**

<b>Cohort</b>	<b>2010 U.S. Census</b>		<b>2013-2017 ACS</b>	
	<b>Owner</b>	<b>Renter</b>	<b>Owner</b>	<b>Renter</b>
Householder who is White alone	77.9%	56.8%	75.8%	57.7%
Householder who is Black or African American alone	7.0%	14.5%	7.6%	17.1%
Householder who is American Indian and Alaska Native alone	0.4%	0.8%	0.6%	0.5%
Householder who is Asian alone	2.0%	1.9%	2.4%	2.1%
Householder who is Native Hawaiian and Other Pacific Islander alone	0.0%	0.0%	0.0%	0.1%
Householder who is some other race alone	10.4%	22.1%	11.4%	19.7%
Householder who is two or more races	2.4%	3.9%	2.2%	2.8%
Householder who is Hispanic or Latino	18.3%	39.7%	28.5%	51.0%

Source: 2010 U.S. Census and 2013-2017 ACS

Homeownership rates continue to decline in Allentown. Homeowners represented 53.0% (22,284 households) of all households in 2000, 48.4% (20,730 households) of all households in 2010, and 43.4% (18,195 households) of all households in 2017. In response, rental rates increased in the City. Renters represented 47.0% (19,748 households) of all households in 2000, 51.6% (22,074 households) of all households in 2010, and 56.6% (23,740 households) of all households in 2017.

Significant shifts in Allentown include the 2,535 unit decrease in owner-occupied units from 2010 to 2017 was a 5.0% decrease and the 1,666 unit increase in renter-occupied units from 2010 to 2017 was a 5.0% increase. Additionally, there was a 543 unit (10.2% increase) increase in the number of Hispanic or Latino Householder owner-occupied units, a 4,852 unit (10.2% decrease) decrease in the number of not Hispanic or Latino Householder owner-occupied units, a 2,767 unit (11.3% increase) increase in the number of Hispanic or Latino Householder renter-occupied units, and a 5,102 unit (14.2% decrease) decrease in the number of Hispanic or Latino Householder renter-occupied units.



### Household Tenure by Race and Ethnicity – Bethlehem

The table below compares homeowners and renters by race and ethnicity in Bethlehem. White households represent 83.9% of all households, 89.6% of homeowners and 77.8% of renters. Black or African American households represent 5.5% of all households, 2.9% of homeowners and 8.2% of renters. Hispanic or Latino households represent 23.1% of all households, 13.5% of homeowners and 33.3% of renters.

#### Household Tenure by Race and Ethnicity in the City of Bethlehem

Cohort	2010 U.S. Census		2013-2017 ACS	
	Owner	Renter	Owner	Renter
Householder who is White alone	90.1%	71.5%	89.6%	77.8%
Householder who is Black or African American alone	3.1%	8.9%	2.9%	8.2%
Householder who is American Indian and Alaska Native alone	0.2%	0.4%	0.2%	0.5%
Householder who is Asian alone	1.2%	3.6%	1.2%	2.8%
Householder who is Native Hawaiian and Other Pacific Islander alone	0.0%	0.0%	0.0%	0.0%
Householder who is some other race alone	4.2%	12.7%	3.4%	6.2%
Householder who is two or more races	1.2%	2.8%	2.7%	4.4%
Householder who is Hispanic or Latino	13.7%	25.5%	13.5%	33.3%

Source: 2010 U.S. Census and 2013-2017 ACS

Homeownership rates continue to decline in the Bethlehem. Homeowners represented 58.1% (16,327 households) of all households in 2000, 53.6% (15,727 households) of all households in 2010, and 51.7% (14,955 households) of all households in 2017. In response, rental rates increased in the City. Renters represented 41.9% (11,789 households) of all households in 2000, 46.4% (13,638 households) of all households in 2010, and 48.3% (13,981 households) of all households in 2017.

Significant shifts in Bethlehem include the 1,121 unit increase in renter-occupied units whose Householder is White alone from 2010 to 2017 was a

6.3% increase and the 860 unit decrease in renter-occupied units whose Householder is Some Other Race alone from 2010 to 2017 was a 6.5% decrease. Additionally, there was a 852 unit (7.8% increase) increase in the number of Hispanic or Latino Householder renter-occupied units, and a 2,225 unit (8.8% decrease) decrease in the number of not Hispanic or Latino Householder renter-occupied units.

### Household Tenure by Race and Ethnicity – Easton

The table below compares homeowners and renters by race and ethnicity in Easton. White households represent 75.2% of all households, 84.6% of homeowners and 67.6% of renters. Black or African American households represent 13.5% of all households, 8.5% percent of homeowners and 17.7% of renters. Hispanic or Latino households represent 18.6% of all households, 10.5% of homeowners and 25.4% of renters.

**Household Tenure by Race and Ethnicity in the City of Easton**

Cohort	2010 U.S. Census		2013-2017 ACS	
	Owner	Renter	Owner	Renter
Householder who is White alone	80.6%	66.0%	84.3%	67.6%
Householder who is Black or African American alone	11.1%	20.1%	8.5%	17.7%
Householder who is American Indian and Alaska Native alone	0.1%	0.7%	0.1%	1.1%
Householder who is Asian alone	1.9%	1.5%	2.4%	1.6%
Householder who is Native Hawaiian and Other Pacific Islander alone	0.1%	0.1%	0.0%	0.3%
Householder who is some other race alone	3.9%	8.3%	2.7%	6.6%
Householder who is two or more races	2.2%	3.4%	2.0%	5.1%
Householder who is Hispanic or Latino	8.2%	17.5%	10.5%	25.4%

Source: 2010 U.S. Census and 2013-2017 ACS

Homeownership rates continue to decline in Easton. Homeowners represented 48.5% (4,632 households) of all households in 2000, 46.5% (4,325 households) of all households in 2010, and 45.4% (4,326 households) of all households in 2017. In response, rental rates increased in the City. Renters

represented 51.5% (4,912 households) of all households in 2000, 53.5% (4,982 households) of all households in 2010, and 54.6% (5,195 households) of all households in 2017.

The only shift larger than 5.0 percentage points in Easton City was the 432 unit increase in owner-occupied units whose Householder is not Hispanic or Latino from 2010 to 2017 which was a 7.9% increase.

### Household Tenure by Race and Ethnicity – Northampton County

The table below compares homeowners and renters by race and ethnicity in Northampton County. White households represent 89.9% of all households, 92.7% of homeowners and 82.7% of renters. Black or African American households represent 4.3% of all households, 2.8% of homeowners and 8.0% of renters. Hispanic or Latino households represent 9.8% of all households, 5.4% of homeowners and 20.9% of renters.

#### Household Tenure by Race and Ethnicity in Northampton County

Cohort	2010 U.S. Census		2013-2017 ACS	
	Owner	Renter	Owner	Renter
Householder who is White alone	93.2%	80.3%	92.7%	82.7%
Householder who is Black or African American alone	2.7%	8.1%	2.8%	8.0%
Householder who is American Indian and Alaska Native alone	0.1%	0.3%	0.1%	0.6%
Householder who is Asian alone	1.7%	2.1%	2.2%	1.7%
Householder who is Native Hawaiian and Other Pacific Islander alone	0.0%	0.0%	0.0%	0.1%
Householder who is some other race alone	1.4%	6.9%	1.1%	3.7%
Householder who is two or more races	0.8%	2.3%	1.0%	3.2%
Householder who is Hispanic or Latino	4.7%	15.2%	5.4%	20.9%

Source: 2010 U.S. Census and 2013-2017 ACS

The total number of owner-occupied units in Northampton County increased from 2000 to 2010 and then decreased slightly from 2010 to 2017, with the overall total number of owner-occupied units in 2017 being greater than the

number in 2000 but fewer than the total number in 2010. However, the percentage of units that were owner-occupied has decreased steadily from 2000 to 2017. Homeowners represented 73.3% (74,464 households) of all households in 2000, 72.8% (82,719 households) of all households in 2010, and 71.6% (81,540 households) of all households in 2017. The total number of renter-occupied units have increased steadily from 2000 to 2017 as have the rental rates increased in the County. Renters represented 26.7% (27,077 households) of all households in 2000, 27.2% (30,846 households) of all households in 2010, and 28.4% (32,287 households) of all households in 2017.

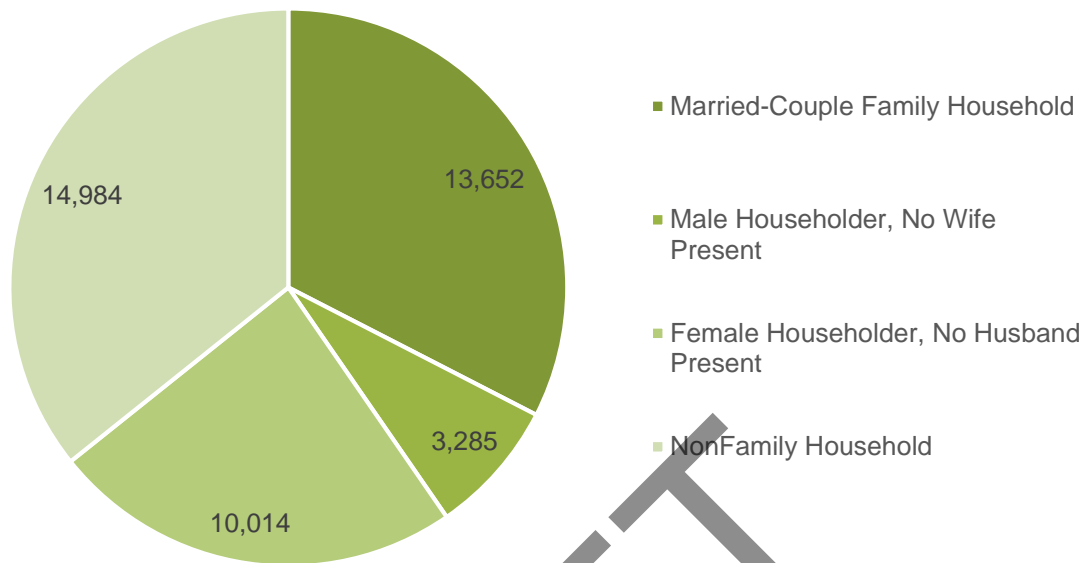
The only shift larger than 5.0 percentage points in Northampton County was the 1,776 unit increase in renter-occupied units whose Householder is Hispanic or Latino from 2010 to 2017 which was a 5.7% increase.

### **Families - Allentown**

In 2000, there were a total of 42,032 households in Allentown. Non-family households comprised 40.2% (16,905 households) of all households. In 2010, there were a total of 44,013 households, an increase of 1,981 households, and the percentage of non-family households had decreased to 39.0% (17,151 households) even though the total number of non-family households increased. In 2017, there were a total of 41,935 households, of which 35.7% (14,984 households) were non-family households. The total number of households in Allentown decreased by 2,078 households from 2010 to 2017, as did the total number of non-family households, a decrease of 3.2% (2,167 households). A non-family household is defined as a householder living alone or with others not related by family.

In 2017, non-family households comprised 35.7% of all households, married-couple family households comprised 32.6% of all households, female householders with no husband present comprised 23.9% of all households, and male householders with no wife present comprised 7.8% of all households in the City. The chart below illustrates the breakdown of households by type in the City of Allentown as of 2017 using data from the 2013-2017 ACS.

## Households in Allentown



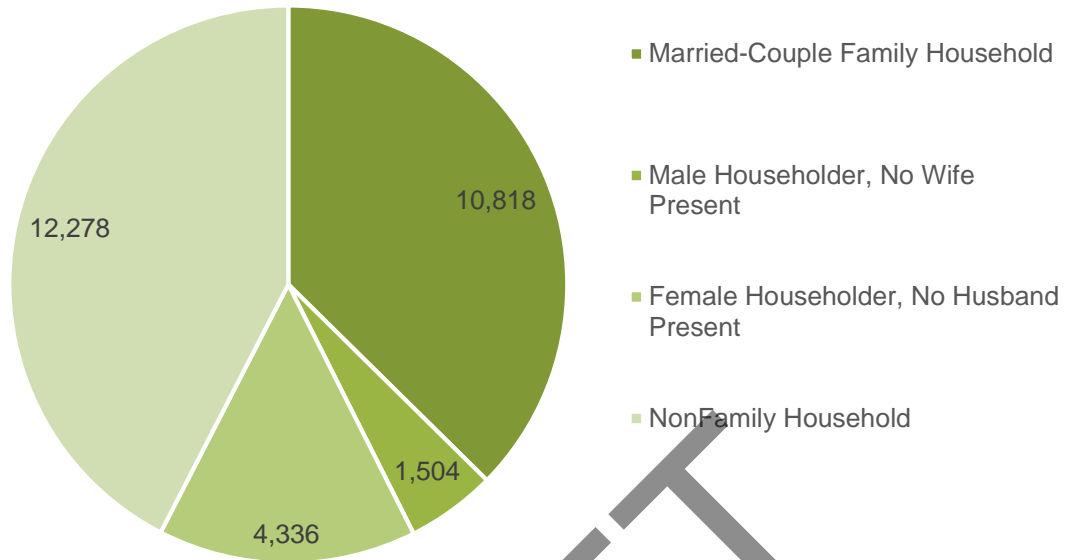
Source: 2013-2017 ACS

## Families – Bethlehem

In 2000, there were a total of 28,116 households in Bethlehem. Non-family households comprised 39.2% (11,026 households) of all households. In 2010, there were a total of 29,349 households, an increase of 1,233 households, and the percentage of non-family households had increased to 41.5% (12,191 households). In 2017, there were a total of 28,936 households, of which 42.4% (12,278 households) comprised of non-family households. The total number of households in Bethlehem decreased by 413 units from 2010 to 2017, whereas the total number of non-family households increased by 87 units, an increase of 0.9%. A non-family household is defined as a householder living alone or with others not related by family.

In 2017, non-family households comprised 42.4% of all households, married-couple family households comprised 37.4% of all households, female householders with no husband present comprised 15.0% of all households, and male householders with no wife present comprised 5.2% of all households in the City. The chart below illustrates the breakdown of households by type in the City of Bethlehem as of 2017 using data from the 2013-2017 ACS.

### Households in Bethlehem City



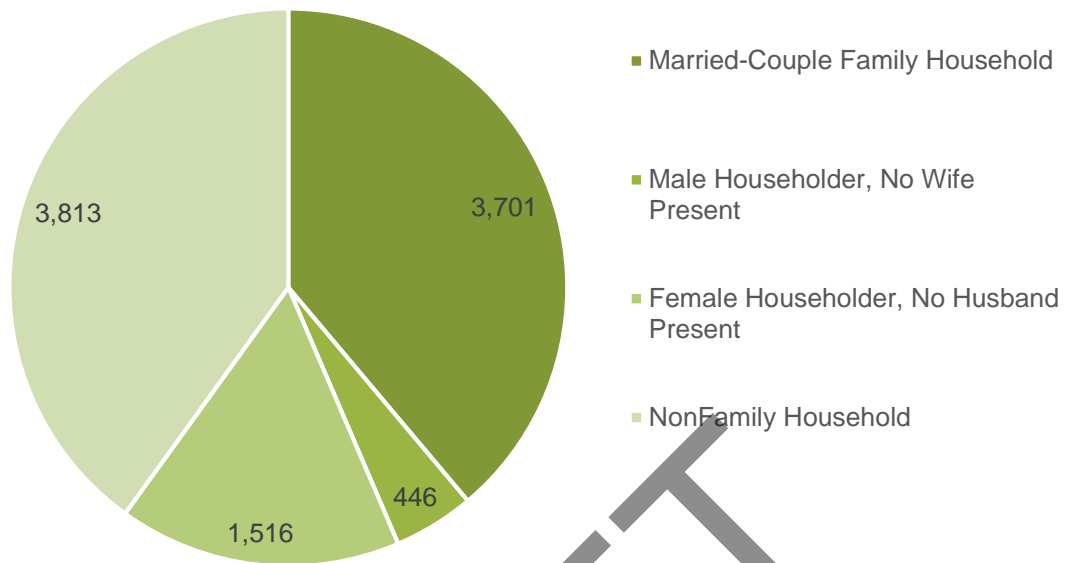
Source: 2013-2017 ACS

### Families – Easton

In 2000, there were a total of 9,544 households in Easton. Non-family households comprised 39.9% (3,806 households) of all households. In 2010, there were a total of 9,226 households, a decrease of 318 households, and the percentage of non-family households had decreased to 37.4% (3,447 households). In 2017, there were a total of 9,521 households, of which 40.0% (3,813 households) comprised of non-family households. The total number of households in Easton increased by 295 units from 2010 to 2017, and the total number of non-family households increased by 366 units, an increase of 2.7%. A non-family household is defined as a householder living alone or with others not related by family.

In 2017, non-family households comprised 40.0% of all households, married-couple family households comprised 38.9% of all households, female householders with no husband present comprised 16.4% of all households, and male householders with no wife present comprised 4.7% of all households in the City. The chart below illustrates the breakdown of households by type in the City of Easton as of 2017 using data from the 2013-2017 ACS.

### Households in Easton



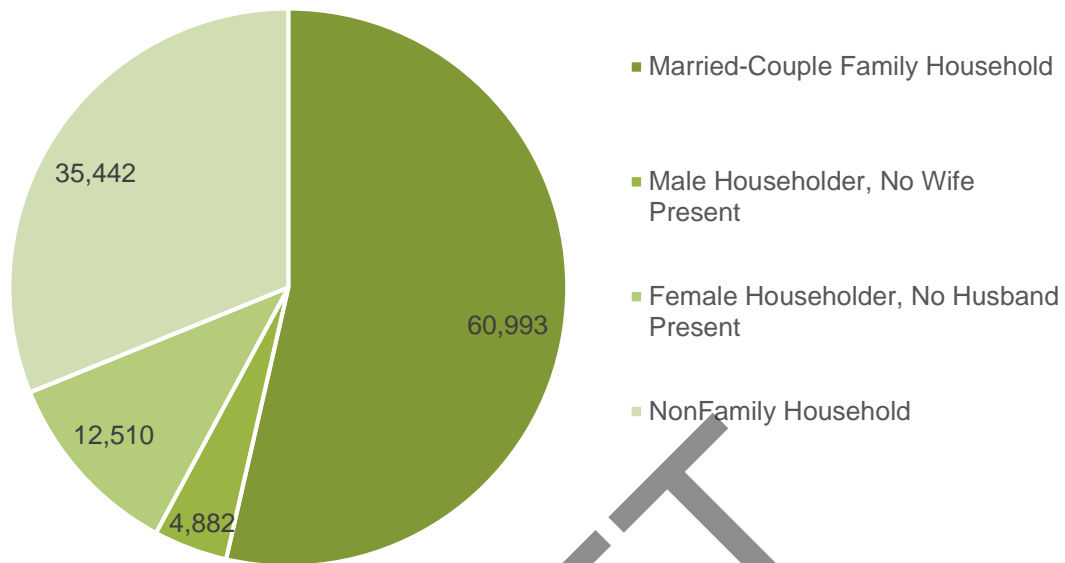
Source: 2013-2017 ACS

### Families – Northampton County

In 2000, there were a total of 101,541 households in Northampton County. Non-family households comprised 30.0% (30,467 households) of all households. In 2010, there were a total of 111,706 households, an increase of 10,165 households, and the percentage of non-family households had increased to 31.7% (4,941 households). In 2017, there were a total of 113,827 households, of which 31.1% (35,442 households) comprised of non-family households. The total number of households in Northampton County increased by 2121 units from 2010 to 2017, and the total number of non-family households increased by 34 units, but the percentage of non-family households declined by 0.6%. A non-family household is defined as a householder living alone or with others not related by family.

In 2017, non-family households comprised 31.1% of all households, married-couple family households comprised 53.6% of all households, female householders with no husband present comprised 11.0% of all households, and male householders with no wife present comprised 4.3% of all households in the County. The chart below illustrates the breakdown of households by type in the County of Northampton as of 2017 using data from the 2013-2017 ACS.

## Households in Northampton



Source: 2013-2017 ACS

## C. Income and Poverty:

## Household Income – Allentown

The median household income for the City of Allentown increased by 6.4% over the time period of 2010 to 2017 from \$36,202 in 2010 to \$38,522 in 2017.

The median household income for Northampton County increased by 11.3% over the same time period from \$58,762 in 2010 to \$65,390 in 2017.

The median household income for the Commonwealth of Pennsylvania increased by 13.0% over the same time period from \$50,398 in 2010 to \$56,951 in 2017.

The table below compares the distribution of household income according to the 2006-2010 American Community Survey and the 2013-2017 American Community Survey.

## Household Income in Allentown

Items	2006-2010 ACS		2013-2017 ACS	
	Number of Households	Percentage	Number of Households	Percentage



Total Households	43,738	-	41,935	-
Less than \$10,000	5,061	11.6%	4,601	11.0%
\$10,000 to \$14,999	3,761	8.6%	3,442	8.2%
\$15,000 to \$24,999	6,584	15.1%	5,809	13.9%
\$25,000 to \$34,999	5,707	13.0%	5,396	12.9%
\$35,000 to \$49,999	7,468	17.1%	6,057	14.4%
\$50,000 to \$74,999	7,186	16.4%	8,146	19.4%
\$75,000 to \$99,999	4,165	9.5%	4,218	10.1%
\$100,000 to \$149,999	2,735	6.3%	2,982	7.1%
\$150,000 to \$199,999	619	1.4%	722	1.7%
\$200,000 or more	452	1.0%	562	1.3%
<b>Median Household Income</b>	<b>\$36,202</b>	<b>-</b>	<b>\$38,522</b>	<b>-</b>

Source: 2006-2010 and 2013-2017 ACS

### Household Income – Bethlehem

The median household income for the City of Bethlehem increased by 17.1% over the time period of 2010 to 2017 from \$44,310 in 2010 to \$51,880 in 2017.

The median household income for Northampton County increased by 11.3% over the same time period from \$58,762 in 2010 to \$65,390 in 2017

The median household income for the Commonwealth of Pennsylvania increased by 13.0 percent over the same time period from \$50,398 in 2010 to \$56,951 in 2017.

The table below compares the distribution of household income according to the 2006-2010 American Community Survey and the 2013-2017 American Community Survey.

**Household Income in Bethlehem**

Items	2006-2010 ACS		2013-2017 ACS	
	Number of Households	Percentage	Number of Households	Percentage
Total Households	29,584	-	28,936	-
Less than \$10,000	2,476	8.4%	2,210	7.6%
\$10,000 to \$14,999	2,118	7.2%	1,680	5.8%
\$15,000 to \$24,999	4,048	13.7%	3,197	11.0%
\$25,000 to \$34,999	3,272	11.1%	3,083	10.7%
\$35,000 to \$49,999	4,444	15.0%	3,864	13.4%
\$50,000 to \$74,999	5,881	19.9%	5,423	18.7%
\$75,000 to \$99,999	3,475	11.7%	3,466	12.0%
\$100,000 to \$149,999	2,623	8.9%	3,804	13.1%
\$150,000 to \$199,999	735	2.5%	1,220	4.2%
\$200,000 or more	512	1.7%	989	3.4%
<b>Median Household Income</b>	<b>\$44,310</b>	<b>-</b>	<b>\$51,880</b>	<b>-</b>

Source: 2006-2010 and 2013-2017 ACS

**Household Income – Easton**

The median household income for the City of Easton increased by 21.3% over the time period of 2010 to 2017 from \$38,613 in 2010 to \$46,835 in 2017.

The median household income for Northampton County increased by 11.3% over the same time period from \$58,762 in 2010 to \$65,390 in 2017.

The median household income for the Commonwealth of Pennsylvania increased by 13.0 percent over the same time period from \$50,398 in 2010 to \$56,951 in 2017.

The table below compares the distribution of household income according to the 2006-2010 American Community Survey and the 2013-2017 American Community Survey.

### Household Income in Easton

Items	2006-2010 ACS		2013-2017 ACS	
	Number of Households	Percentage	Number of Households	Percentage
Total Households	9,222	-	9,521	-
Less than \$10,000	946	10.3%	641	6.7%
\$10,000 to \$14,999	689	7.5%	710	7.5%
\$15,000 to \$24,999	1,331	14.4%	1,401	14.7%
\$25,000 to \$34,999	1,137	12.3%	1,134	11.9%
\$35,000 to \$49,999	1,589	17.2%	1,148	12.1%
\$50,000 to \$74,999	1,722	18.7%	1,827	19.2%
\$75,000 to \$99,999	780	8.5%	995	10.5%
\$100,000 to \$149,999	752	8.2%	1,057	11.1%
\$150,000 to \$199,999	171	1.9%	319	3.4%
\$200,000 or more	105	1.1%	289	3.0%
<b>Median Household Income</b>	<b>\$38,613</b>	-	<b>\$46,835</b>	-

Source: 2006-2010 and 2013-2017 ACS

### Household Income – Northampton County

The median household income for Northampton County increased by 11.3% over the time period from \$58,762 in 2010 to \$65,390 in 2017

The median household income for the Commonwealth of Pennsylvania increased by 13.0% over the same time period from \$50,398 in 2010 to \$56,951 in 2017.

The table below compares the distribution of household income according to the 2006-2010 American Community Survey and the 2013-2017 American Community Survey.

### Household Income in Northampton County, PA

Items	2006-2010 ACS		2013-2017 ACS	
	Number of Households	Percentage	Number of Households	Percentage
Total Households	111,929	-	113,827	-
Less than \$10,000	5,244	4.7%	4,741	4.2%
\$10,000 to \$14,999	5,108	4.6%	4,106	3.9%
\$15,000 to \$24,999	10,982	9.8%	10,410	9.1%
\$25,000 to \$34,999	10,593	9.5%	9,609	8.4%
\$35,000 to \$49,999	15,494	13.8%	14,393	12.6%
\$50,000 to \$74,999	22,730	20.3%	21,114	18.5%
\$75,000 to \$99,999	16,040	14.3%	15,940	14.0%
\$100,000 to \$149,999	16,764	15.0%	19,117	16.8%
\$150,000 to \$199,999	5,159	4.6%	7,549	6.6%
\$200,000 or more	3,815	3.4%	6,548	5.8%
<b>Median Household Income</b>	<b>\$58,762</b>	<b>-</b>	<b>\$65,390</b>	<b>-</b>

Source: 2006-2010 and 2013-2017 ACS

The Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for assisted housing programs including the Public Housing, Section 8 project-based, Section 8 Housing Choice Voucher, Section 202 housing for the elderly, and Section 811 housing for persons with disabilities programs. HUD develops income limits based on Median Family Income estimates and Fair Market Rent area definitions for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan county.

The Median Income for a family income in Northampton County was \$79,209 for 2017.

The table below identifies the FY 2019 HUD Income Limits applicable to the City of Allentown, the City of Bethlehem, and the City of Easton, these cities are part of the Allentown-Bethlehem-Easton-Northampton Census Tract, MD HUD Metro FMR Area.

**FY 2019 Income Limits Allentown-Bethlehem-Easton, PA  
MSA HUD Metro FMR Area**

Income Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
<b>Extremely Low (30%) Income Limits</b>	\$16,450	\$18,800	\$21,330	\$25,750	\$30,170	\$34,590	\$39,010	\$43,430
<b>Very Low (50%) Income Limits</b>	\$27,450	\$31,400	\$35,300	\$39,200	\$42,350	\$45,500	\$48,650	\$51,750
<b>Low (80%) Income Limits</b>	\$43,900	\$50,200	\$56,450	\$62,700	\$67,750	\$72,750	\$77,750	\$82,800

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

On February 14, 2019, HUD CPD-19-02 Notice that updated the Department's Low- and Moderate-Income Summary Data (LMISD) based on the American Community Survey 2011-2015 5-year estimates (2015 ACS). This data replaced the prior LMISD based on the American Community Survey 2006-2010 5-year estimates (2010 ACS) for the purposes of demonstrating compliance with the CDBG National Objective of providing benefit to low- and moderate-income persons on an area basis ("Area Benefit" or LMA). The table below highlights the current low- and moderate-income populations in the Cities of Allentown, Bethlehem, Easton, and Northampton County. The block groups that have a population of more than 51% low- and moderate-income are **highlighted and bold**.

The City of Allentown has an overall low- and moderate-income population of 65.67%. The City of Bethlehem has an overall low- and moderate-income population of 50.58%. The City of Easton has an overall low- and moderate-income population of 59.10%. Northampton County has an overall low- and moderate-income population of 35.77%. Northampton County qualifies as an Upper Quartile Exception Criteria Community. Any Census Tracts and Block Groups that exceeds LMI% of 46.58% qualifies as LMA as established by HUD for Northampton County.

**Low- and Moderate-Income Population FY 2019 for Allentown, Bethlehem, Easton, and Northampton County**

PLACE	COUNTY	CT	BG	LMI	TOT POP	PERCENT
Allentown	Lehigh County	000101	1	540	1,135	47.58%
Allentown	Lehigh County	000101	2	600	1,300	46.15%
<b>Allentown</b>	<b>Lehigh County</b>	<b>000101</b>	<b>3</b>	<b>615</b>	<b>920</b>	<b>66.85%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>000102</b>	<b>1</b>	<b>940</b>	<b>1,060</b>	<b>88.68%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>000102</b>	<b>2</b>	<b>580</b>	<b>1,065</b>	<b>54.46%</b>
Allentown	Lehigh County	000102	3	735	1,520	48.36%
Allentown	Lehigh County	000102	4	385	770	50.00%
<b>Allentown</b>	<b>Lehigh County</b>	<b>000400</b>	<b>1</b>	<b>945</b>	<b>1,285</b>	<b>73.54%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>000400</b>	<b>2</b>	<b>1,965</b>	<b>2,490</b>	<b>78.92%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>000500</b>	<b>1</b>	<b>1,260</b>	<b>1,535</b>	<b>82.08%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>000500</b>	<b>2</b>	<b>825</b>	<b>985</b>	<b>83.76%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>000600</b>	<b>1</b>	<b>1,925</b>	<b>3,055</b>	<b>63.01%</b>
Allentown	Lehigh County	000600	2	320	1,220	26.23%
<b>Allentown</b>	<b>Lehigh County</b>	<b>000600</b>	<b>3</b>	<b>460</b>	<b>760</b>	<b>60.53%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>000600</b>	<b>4</b>	<b>1,140</b>	<b>1,570</b>	<b>72.61%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>000700</b>	<b>1</b>	<b>825</b>	<b>970</b>	<b>85.05%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>000700</b>	<b>2</b>	<b>1,070</b>	<b>1,850</b>	<b>57.84%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>000700</b>	<b>3</b>	<b>1,415</b>	<b>1,630</b>	<b>86.81%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>000800</b>	<b>1</b>	<b>790</b>	<b>790</b>	<b>100.00%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>000800</b>	<b>2</b>	<b>1,045</b>	<b>1,200</b>	<b>87.08%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>000800</b>	<b>3</b>	<b>900</b>	<b>1,170</b>	<b>76.92%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>000800</b>	<b>4</b>	<b>530</b>	<b>765</b>	<b>69.28%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>000900</b>	<b>1</b>	<b>1,275</b>	<b>1,415</b>	<b>90.11%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>001000</b>	<b>1</b>	<b>1,165</b>	<b>1,595</b>	<b>73.04%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>001000</b>	<b>2</b>	<b>1,005</b>	<b>1,240</b>	<b>81.05%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>001200</b>	<b>1</b>	<b>935</b>	<b>1,260</b>	<b>74.21%</b>

Allentown	Lehigh County	001401	1	1,040	1,495	69.57%
Allentown	Lehigh County	001401	2	1,890	3,130	60.38%
Allentown	Lehigh County	001401	3	955	1,350	70.74%
Allentown	Lehigh County	001401	4	595	810	73.46%
Allentown	Lehigh County	001401	5	850	1,830	46.45%
Allentown	Lehigh County	001402	1	565	1,220	46.31%
Allentown	Lehigh County	001402	2	415	700	59.29%
Allentown	Lehigh County	001501	1	700	1,110	63.06%
Allentown	Lehigh County	001501	2	1,815	2,300	78.91%
Allentown	Lehigh County	001501	3	1,110	1,300	85.38%
Allentown	Lehigh County	001501	4	1,230	2,145	57.34%
Allentown	Lehigh County	001502	1	805	1,945	41.39%
Allentown	Lehigh County	001502	2	495	1,095	45.21%
Allentown	Lehigh County	001502	3	570	1,465	38.91%
Allentown	Lehigh County	001502	4	1,580	2,590	61.00%
Allentown	Lehigh County	001600	1	785	785	100.00%
Allentown	Lehigh County	001600	2	1,085	1,260	86.11%
Allentown	Lehigh County	001600	3	595	680	87.50%
Allentown	Lehigh County	001600	4	630	785	80.25%
Allentown	Lehigh County	001700	1	725	970	74.74%
Allentown	Lehigh County	001700	2	1,805	2,840	63.56%
Allentown	Lehigh County	001700	3	1,180	1,370	86.13%
Allentown	Lehigh County	001800	1	840	1,020	82.35%
Allentown	Lehigh County	001800	2	1,360	1,720	79.07%
Allentown	Lehigh County	001800	3	615	895	68.72%
Allentown	Lehigh County	001800	4	995	1,230	80.89%
Allentown	Lehigh County	001900	1	420	1,370	30.66%
Allentown	Lehigh County	001900	2	2,095	2,995	69.95%
Allentown	Lehigh County	002000	1	640	815	78.53%

Allentown	Lehigh County	002000	2	830	930	89.25%
Allentown	Lehigh County	002000	3	430	565	76.11%
Allentown	Lehigh County	002000	4	1,170	1,810	64.64%
Allentown	Lehigh County	002000	5	705	940	75.00%
Allentown	Lehigh County	002100	1	1,215	1,490	81.54%
Allentown	Lehigh County	002100	2	980	1,530	64.05%
Allentown	Lehigh County	002100	3	1,135	1,310	86.64%
Allentown	Lehigh County	002100	4	640	985	64.97%
Allentown	Lehigh County	002100	5	825	945	87.30%
Allentown	Lehigh County	002201	1	480	860	55.81%
Allentown	Lehigh County	002201	2	395	955	41.36%
Allentown	Lehigh County	002201	3	685	1,575	43.49%
Allentown	Lehigh County	002201	4	450	865	52.02%
Allentown	Lehigh County	002202	1	470	800	58.75%
Allentown	Lehigh County	002202	2	655	830	78.92%
Allentown	Lehigh County	002301	1	535	1,550	34.52%
Allentown	Lehigh County	002301	2	135	780	17.31%
Allentown	Lehigh County	002301	3	415	740	56.08%
Allentown	Lehigh County	002301	4	455	1,715	26.53%
Allentown	Lehigh County	002301	5	180	795	22.64%
Allentown	Lehigh County	002301	6	130	705	18.44%
Allentown	Lehigh County	002302	1	350	825	42.42%
Allentown	Lehigh County	002302	2	775	1,280	60.55%
Allentown	Lehigh County	002302	3	160	610	26.23%
Allentown	Lehigh County	009600	1	1,505	1,930	77.98%
Allentown	Lehigh County	009600	2	1,190	2,240	53.13%
Allentown	Lehigh County	009600	3	1,210	1,580	76.58%
Allentown	Lehigh County	009600	4	830	905	91.71%
Allentown	Lehigh County	009600	5	600	755	79.47%



<b>Allentown</b>	<b>Lehigh County</b>	<b>009700</b>	<b>1</b>	<b>1,030</b>	<b>1,215</b>	<b>84.77%</b>
<b>Allentown</b>	<b>Lehigh County</b>	<b>009700</b>	<b>2</b>	<b>1,775</b>	<b>2,250</b>	<b>78.89%</b>
Bethlehem	Lehigh County	009100	1	455	1,300	35.00%
<b>Bethlehem</b>	<b>Lehigh County</b>	<b>009100</b>	<b>2</b>	<b>390</b>	<b>565</b>	<b>69.03%</b>
Bethlehem	Lehigh County	009100	3	520	1,100	47.27%
Bethlehem	Lehigh County	009200	1	710	1,620	43.83%
Bethlehem	Lehigh County	009200	2	320	1,295	24.71%
Bethlehem	Lehigh County	009200	3	375	945	39.68%
Bethlehem	Lehigh County	009300	1	335	1,000	33.50%
Bethlehem	Lehigh County	009300	2	200	660	30.30%
Bethlehem	Lehigh County	009300	3	345	730	47.26%
Bethlehem	Lehigh County	009300	4	160	705	22.70%
<b>Bethlehem</b>	<b>Lehigh County</b>	<b>009400</b>	<b>1</b>	<b>600</b>	<b>1,170</b>	<b>51.28%</b>
<b>Bethlehem</b>	<b>Lehigh County</b>	<b>009400</b>	<b>2</b>	<b>590</b>	<b>735</b>	<b>80.27%</b>
Bethlehem	Lehigh County	009400	3	490	1,105	44.34%
<b>Bethlehem</b>	<b>Lehigh County</b>	<b>009400</b>	<b>4</b>	<b>930</b>	<b>1,300</b>	<b>71.54%</b>
Bethlehem	Lehigh County	009500	1	160	815	19.63%
Bethlehem	Lehigh County	009500	2	390	830	46.99%
<b>Bethlehem</b>	<b>Lehigh County</b>	<b>009500</b>	<b>3</b>	<b>585</b>	<b>1,060</b>	<b>55.19%</b>
Bethlehem	Lehigh County	009500	4	410	895	45.81%
Bethlehem	Lehigh County	009500	5	295	885	33.33%
Bethlehem	Northampton County	010100	1	625	1,545	40.45%
Bethlehem	Northampton County	010100	2	455	1,030	44.17%
Bethlehem	Northampton County	010100	3	505	1,325	38.11%
Bethlehem	Northampton County	010200	1	415	2,065	20.10%
Bethlehem	Northampton County	010200	2	215	1,510	14.24%
Bethlehem	Northampton County	010300	1	120	640	18.75%
Bethlehem	Northampton County	010300	2	320	695	46.04%
Bethlehem	Northampton County	010300	3	265	790	33.54%

Bethlehem	Northampton County	010300	4	265	780	33.97%
Bethlehem	Northampton County	010400	1	205	1,195	17.15%
Bethlehem	Northampton County	010400	2	465	1,090	42.66%
Bethlehem	Northampton County	010400	3	265	780	33.97%
Bethlehem	Northampton County	010400	4	310	1,420	21.83%
Bethlehem	Northampton County	010400	5	145	775	18.71%
Bethlehem	Northampton County	010500	1	395	985	40.10%
<b>Bethlehem</b>	<b>Northampton County</b>	<b>010500</b>	<b>2</b>	<b>1,170</b>	<b>1,240</b>	<b>94.35%</b>
<b>Bethlehem</b>	<b>Northampton County</b>	<b>010500</b>	<b>3</b>	<b>985</b>	<b>1,325</b>	<b>74.34%</b>
<b>Bethlehem</b>	<b>Northampton County</b>	<b>010500</b>	<b>4</b>	<b>455</b>	<b>565</b>	<b>80.53%</b>
Bethlehem	Northampton County	010600	1	195	510	38.24%
<b>Bethlehem</b>	<b>Northampton County</b>	<b>010600</b>	<b>2</b>	<b>470</b>	<b>735</b>	<b>63.95%</b>
Bethlehem	Northampton County	010600	3	250	960	26.04%
<b>Bethlehem</b>	<b>Northampton County</b>	<b>010600</b>	<b>4</b>	<b>430</b>	<b>725</b>	<b>59.31%</b>
<b>Bethlehem</b>	<b>Northampton County</b>	<b>010600</b>	<b>5</b>	<b>1,075</b>	<b>2,000</b>	<b>53.75%</b>
Bethlehem	Northampton County	010600	6	500	1,095	45.66%
<b>Bethlehem</b>	<b>Northampton County</b>	<b>010600</b>	<b>7</b>	<b>1,000</b>	<b>1,510</b>	<b>66.23%</b>
Bethlehem	Northampton County	010700	1	580	1,455	39.86%
<b>Bethlehem</b>	<b>Northampton County</b>	<b>010700</b>	<b>2</b>	<b>1,030</b>	<b>1,905</b>	<b>54.07%</b>
<b>Bethlehem</b>	<b>Northampton County</b>	<b>010700</b>	<b>3</b>	<b>255</b>	<b>405</b>	<b>62.96%</b>
Bethlehem	Northampton County	010700	4	380	805	47.20%
Bethlehem	Northampton County	010800	1	330	705	46.81%
<b>Bethlehem</b>	<b>Northampton County</b>	<b>010800</b>	<b>2</b>	<b>930</b>	<b>1,370</b>	<b>67.88%</b>
<b>Bethlehem</b>	<b>Northampton County</b>	<b>010900</b>	<b>1</b>	<b>1,155</b>	<b>1,445</b>	<b>79.93%</b>
<b>Bethlehem</b>	<b>Northampton County</b>	<b>010900</b>	<b>2</b>	<b>1,000</b>	<b>1,850</b>	<b>54.05%</b>
<b>Bethlehem</b>	<b>Northampton County</b>	<b>011000</b>	<b>1</b>	<b>700</b>	<b>835</b>	<b>83.83%</b>
<b>Bethlehem</b>	<b>Northampton County</b>	<b>011000</b>	<b>2</b>	<b>380</b>	<b>465</b>	<b>81.72%</b>
<b>Bethlehem</b>	<b>Northampton County</b>	<b>011000</b>	<b>3</b>	<b>1,275</b>	<b>1,540</b>	<b>82.79%</b>

Bethlehem	Northampton County	011100	1	140	160	87.50%
Bethlehem	Northampton County	011200	1	1,405	1,830	76.78%
Bethlehem	Northampton County	011200	2	1,220	1,460	83.56%
Bethlehem	Northampton County	011200	3	865	1,065	81.22%
Bethlehem	Northampton County	011200	4	810	1,270	63.78%
Bethlehem	Northampton County	011300	1	925	2,465	37.53%
Bethlehem	Northampton County	011300	2	1,765	1,940	90.98%
Northampton County	Northampton County	014100	1	185	775	23.87%
Northampton County	Northampton County	014100	2	245	935	26.20%
Northampton County	Northampton County	014100	3	300	725	41.38%
Northampton County	Northampton County	014100	4	135	985	13.71%
Northampton County	Northampton County	014200	1	465	855	54.39%
Northampton County	Northampton County	014200	2	700	1,005	69.65%
Northampton County	Northampton County	014200	3	1,200	1,415	84.81%
Northampton County	Northampton County	014200	4	1,140	1,625	70.15%
Northampton County	Northampton County	014200	5	360	715	50.35%
Northampton County	Northampton County	014300	1	855	1,235	69.23%
Northampton County	Northampton County	014300	2	1,495	1,585	94.32%
Northampton County	Northampton County	014300	3	580	735	78.91%
Northampton County	Northampton County	014400	1	530	845	62.72%
Northampton County	Northampton County	014400	2	335	430	77.91%
Northampton County	Northampton County	014400	3	410	745	55.03%
Northampton County	Northampton County	014500	1	1,005	2,120	47.41%
Northampton County	Northampton County	014500	2	530	955	55.50%
Northampton County	Northampton County	014600	1	705	1,250	56.40%
Northampton County	Northampton County	014600	2	1,640	2,035	80.59%
Northampton County	Northampton County	014700	1	505	1,385	36.46%

<b>Northampton County</b>	<b>Northampton County</b>	<b>014700</b>	<b>2</b>	<b>665</b>	<b>1,315</b>	<b>50.57%</b>
<b>Northampton County</b>	<b>Northampton County</b>	<b>015201</b>	<b>1</b>	<b>1,270</b>	<b>2,050</b>	<b>61.95%</b>
<b>Northampton County</b>	<b>Northampton County</b>	<b>015201</b>	<b>2</b>	<b>690</b>	<b>1,115</b>	<b>61.88%</b>
<b>Northampton County</b>	<b>Northampton County</b>	<b>015201</b>	<b>3</b>	<b>860</b>	<b>1,660</b>	<b>51.81%</b>
Northampton County	Northampton County	015201	4	660	1,670	39.52%
<b>Northampton County</b>	<b>Northampton County</b>	<b>015201</b>	<b>5</b>	<b>300</b>	<b>400</b>	<b>75.00%</b>
Northampton County	Northampton County	015300	1	475	2,400	19.79%
Northampton County	Northampton County	015300	2	370	1,580	23.42%
Northampton County	Northampton County	015300	3	440	1,055	41.71%
Northampton County	Northampton County	015400	1	165	1,185	13.92%
Northampton County	Northampton County	015400	2	370	935	39.57%
Northampton County	Northampton County	015400	3	385	970	39.69%
Northampton County	Northampton County	015500	1	650	2,320	28.02%
Northampton County	Northampton County	015500	2	545	2,015	27.05%
Northampton County	Northampton County	015500	3	440	1,810	24.31%
Northampton County	Northampton County	015600	1	565	1,765	32.01%
<b>Northampton County</b>	<b>Northampton County</b>	<b>015600</b>	<b>2</b>	<b>265</b>	<b>440</b>	<b>60.23%</b>
<b>Northampton County</b>	<b>Northampton County</b>	<b>015600</b>	<b>3</b>	<b>935</b>	<b>1,320</b>	<b>70.83%</b>
<b>Northampton County</b>	<b>Northampton County</b>	<b>015700</b>	<b>1</b>	<b>510</b>	<b>865</b>	<b>58.96%</b>
Northampton County	Northampton County	015700	2	185	1,035	17.87%
<b>Northampton County</b>	<b>Northampton County</b>	<b>015700</b>	<b>3</b>	<b>445</b>	<b>810</b>	<b>54.94%</b>
Northampton County	Northampton County	015801	1	295	2,245	13.14%
Northampton County	Northampton County	015801	2	385	2,985	12.90%
Northampton County	Northampton County	015802	1	240	1,480	16.22%
Northampton County	Northampton County	015802	2	360	1,615	22.29%
<b>Northampton County</b>	<b>Northampton County</b>	<b>015901</b>	<b>1</b>	<b>660</b>	<b>1,260</b>	<b>52.38%</b>
Northampton County	Northampton County	015901	2	650	1,715	37.90%
Northampton County	Northampton County	015901	3	210	1,010	20.79%

Northampton County	Northampton County	015901	4	665	1,790	37.15%
Northampton County	Northampton County	015902	1	385	1,435	26.83%
Northampton County	Northampton County	015902	2	450	1,220	36.89%
Northampton County	Northampton County	015902	3	420	955	43.98%
Northampton County	Northampton County	016001	1	390	1,615	24.15%
Northampton County	Northampton County	016001	2	485	2,400	20.21%
Northampton County	Northampton County	016001	3	575	2,005	28.68%
Northampton County	Northampton County	016002	1	555	1,550	35.81%
Northampton County	Northampton County	016002	2	180	580	31.03%
Northampton County	Northampton County	016002	3	465	1,335	34.83%
Northampton County	Northampton County	016002	4	255	940	27.13%
Northampton County	Northampton County	016100	1	270	710	38.03%
Northampton County	Northampton County	016100	2	305	1,390	21.94%
Northampton County	Northampton County	016201	1	285	1,370	20.80%
Northampton County	Northampton County	016201	2	430	1,185	36.29%
<b>Northampton County</b>	<b>Northampton County</b>	<b>016201</b>	<b>3</b>	<b>940</b>	<b>1,370</b>	<b>68.61%</b>
<b>Northampton County</b>	<b>Northampton County</b>	<b>016201</b>	<b>4</b>	<b>1,290</b>	<b>1,715</b>	<b>75.22%</b>
Northampton County	Northampton County	016202	1	420	1,720	24.42%
Northampton County	Northampton County	016202	2	950	2,530	37.55%
Northampton County	Northampton County	016300	1	490	1,120	43.75%
Northampton County	Northampton County	016300	2	620	1,715	36.15%
Northampton County	Northampton County	016400	1	375	1,670	22.46%
Northampton County	Northampton County	016400	2	450	2,845	15.82%
Northampton County	Northampton County	016500	1	115	580	19.83%
Northampton County	Northampton County	016500	2	265	2,595	10.21%
Northampton County	Northampton County	016500	3	495	1,675	29.55%
<b>Northampton County</b>	<b>Northampton County</b>	<b>016600</b>	<b>1</b>	<b>635</b>	<b>1,285</b>	<b>49.42%</b>
<b>Northampton County</b>	<b>Northampton County</b>	<b>016600</b>	<b>2</b>	<b>820</b>	<b>1,325</b>	<b>61.89%</b>
Northampton County	Northampton County	016700	1	270	2,305	11.71%

Northampton County	Northampton County	016700	2	305	2,395	12.73%
Northampton County	Northampton County	016700	3	205	1,090	18.81%
Northampton County	Northampton County	016800	1	270	1,210	22.31%
<b>Northampton County</b>	<b>Northampton County</b>	<b>016800</b>	<b>2</b>	<b>880</b>	<b>1,880</b>	<b>46.81%</b>
Northampton County	Northampton County	016800	3	225	770	29.22%
Northampton County	Northampton County	016800	4	725	1,710	42.40%
Northampton County	Northampton County	016901	1	170	890	19.10%
Northampton County	Northampton County	016901	2	405	2,315	17.49%
Northampton County	Northampton County	016902	1	265	1,595	16.61%
Northampton County	Northampton County	016902	2	125	1,020	12.25%
Northampton County	Northampton County	017000	1	240	1,155	20.78%
Northampton County	Northampton County	017000	2	190	990	19.19%
Northampton County	Northampton County	017101	1	305	2,965	10.29%
Northampton County	Northampton County	017101	2	160	745	21.48%
Northampton County	Northampton County	017101	3	485	2,700	17.96%
Northampton County	Northampton County	017102	1	840	3,525	23.83%
Northampton County	Northampton County	017102	2	670	1,735	38.62%
Northampton County	Northampton County	017102	3	745	3,415	21.82%
<b>Northampton County</b>	<b>Northampton County</b>	<b>017200</b>	<b>1</b>	<b>525</b>	<b>1,020</b>	<b>51.47%</b>
<b>Northampton County</b>	<b>Northampton County</b>	<b>017200</b>	<b>2</b>	<b>1,195</b>	<b>2,390</b>	<b>50.00%</b>
Northampton County	Northampton County	017200	3	325	805	40.37%
Northampton County	Northampton County	017200	4	970	2,100	46.19%
<b>Northampton County</b>	<b>Northampton County</b>	<b>017300</b>	<b>1</b>	<b>635</b>	<b>1,295</b>	<b>49.03%</b>
<b>Northampton County</b>	<b>Northampton County</b>	<b>017300</b>	<b>2</b>	<b>670</b>	<b>1,415</b>	<b>47.35%</b>
Northampton County	Northampton County	017401	1	360	1,605	22.43%
<b>Northampton County</b>	<b>Northampton County</b>	<b>017401</b>	<b>2</b>	<b>530</b>	<b>925</b>	<b>57.30%</b>
Northampton County	Northampton County	017401	3	530	3,155	16.80%
Northampton County	Northampton County	017401	4	95	2,040	4.66%

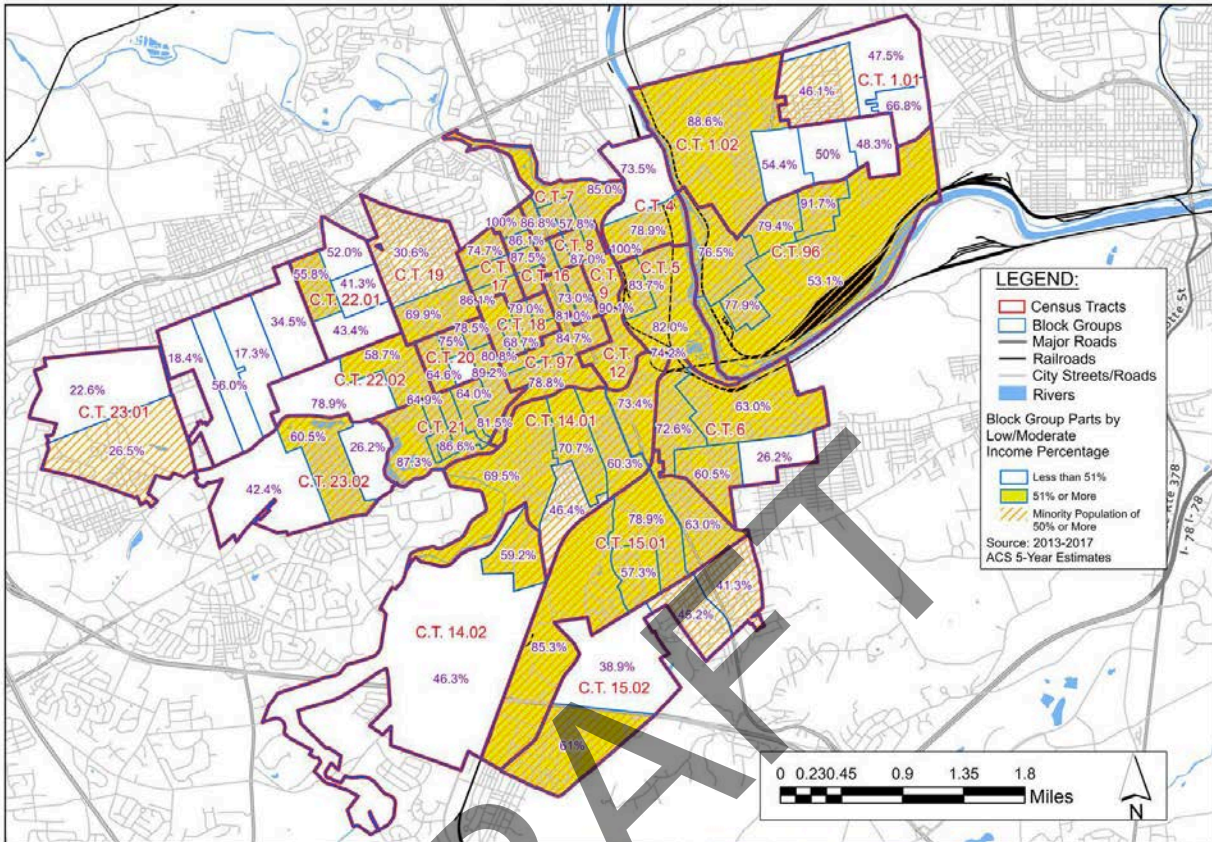
Northampton County	Northampton County	017402	1	360	1,115	32.29%
Northampton County	Northampton County	017402	2	420	1,975	21.27%
Northampton County	Northampton County	017402	3	340	730	46.58%
Northampton County	Northampton County	017501	1	580	1,690	34.32%
Northampton County	Northampton County	017501	2	425	1,370	31.02%
Northampton County	Northampton County	017501	3	310	735	42.18%
Northampton County	Northampton County	017502	1	550	1,915	28.72%
Northampton County	Northampton County	017502	2	865	2,580	33.53%
Northampton County	Northampton County	017502	3	245	880	27.84%
Northampton County	Northampton County	017603	1	410	1,315	31.18%
Northampton County	Northampton County	017603	2	365	1,190	30.67%
Northampton County	Northampton County	017603	3	75	555	13.51%
Northampton County	Northampton County	017603	4	245	745	32.89%
Northampton County	Northampton County	017604	1	345	1,665	20.72%
Northampton County	Northampton County	017604	2	455	1,170	38.89%
Northampton County	Northampton County	017604	3	345	1,405	24.56%
Northampton County	Northampton County	017605	1	570	2,295	24.84%
Northampton County	Northampton County	017605	2	195	1,300	15.00%
Northampton County	Northampton County	017606	1	340	2,905	11.70%
Northampton County	Northampton County	017606	2	230	2,025	11.36%
Northampton County	Northampton County	017607	1	550	2,810	19.57%
Northampton County	Northampton County	017607	2	125	1,760	7.10%
Northampton County	Northampton County	017607	3	670	2,040	32.84%
Northampton County	Northampton County	017702	1	320	2,255	14.19%
Northampton County	Northampton County	017703	1	130	490	26.53%
Northampton County	Northampton County	017703	2	665	2,260	29.42%
Northampton County	Northampton County	017704	1	855	3,785	22.59%
Northampton County	Northampton County	017704	2	395	2,455	16.09%
Northampton County	Northampton County	017800	1	650	1,460	44.52%

<b>Northampton County</b>	<b>Northampton County</b>	<b>017800</b>	<b>2</b>	<b>575</b>	<b>1,120</b>	<b>51.34%</b>
Northampton County	Northampton County	017901	1	230	880	26.14%
Northampton County	Northampton County	017901	2	200	510	39.22%
Northampton County	Northampton County	017901	3	370	815	45.40%
<b>Northampton County</b>	<b>Northampton County</b>	<b>017901</b>	<b>4</b>	<b>690</b>	<b>1,415</b>	<b>48.76%</b>
Northampton County	Northampton County	017902	1	195	630	30.95%
<b>Northampton County</b>	<b>Northampton County</b>	<b>017902</b>	<b>2</b>	<b>415</b>	<b>885</b>	<b>46.89%</b>
Northampton County	Northampton County	017902	3	185	705	26.24%
Northampton County	Northampton County	018001	1	245	605	40.50%
Northampton County	Northampton County	018001	2	695	2,125	32.71%
Northampton County	Northampton County	018001	3	495	1,335	37.08%
Northampton County	Northampton County	018002	1	195	1,515	12.87%
Northampton County	Northampton County	018002	2	345	1,335	25.84%
Northampton County	Northampton County	018002	3	160	1,930	8.29%
Northampton County	Northampton County	018002	4	450	1,845	24.39%
Northampton County	Northampton County	018100	1	465	1,520	30.59%
Northampton County	Northampton County	018100	2	530	1,585	33.44%
Northampton County	Northampton County	018100	3	160	1,710	9.36%
Northampton County	Northampton County	018100	4	210	1,565	13.42%
Northampton County	Northampton County	018200	1	835	2,210	37.78%
Northampton County	Northampton County	018200	2	525	1,280	41.02%
Northampton County	Northampton County	018300	1	210	535	39.25%
Northampton County	Northampton County	018300	2	390	975	40.00%
<b>Northampton County</b>	<b>Northampton County</b>	<b>018300</b>	<b>3</b>	<b>560</b>	<b>1,180</b>	<b>47.46%</b>
Northampton County	Northampton County	018300	4	695	2,240	31.03%

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



## Low- and Moderate-Income Population for the City of Allentown



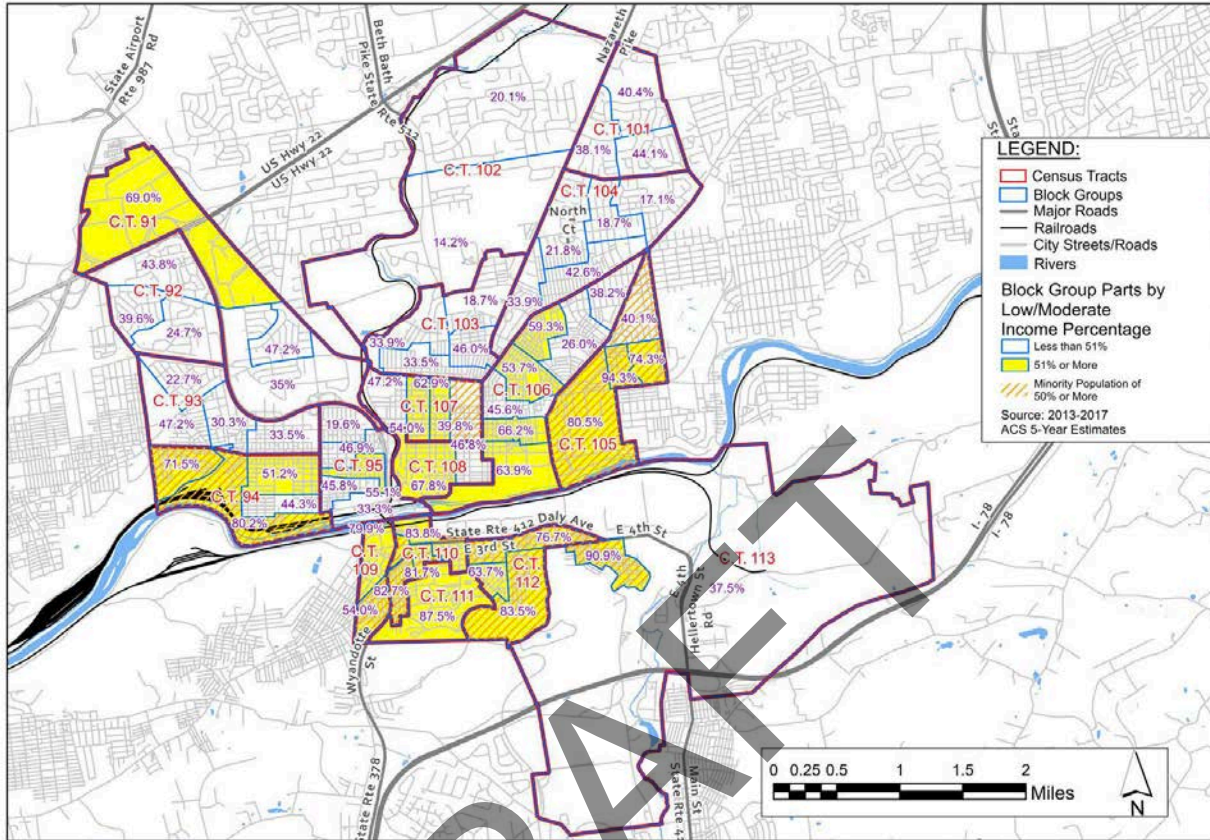
Source: U.S. Department of Housing and Urban Development

The low- and moderate-income census tracts are generally located in the central and southern sections of the City. There is some overlap of higher minority concentrations in the low- and moderate income census tracts in the central and eastern sections of the City.

The percentage of families living in poverty experienced an increase from 21.1% in 2010 to 23.4% in 2017, according to U.S. Census and ACS data. Female head of household, no husband present, families with related children under the age of 18 whose income was below poverty level was 48.8% in 2010 and 47.3% in 2017, according to U.S. Census and ACS data.

There was an increase in all people whose income level was below poverty level from 18.5% in 2000 to 24.6% in 2010 and then an additional increase to 27.3% in 2017, according to U.S. Census and ACS data. Individuals under the age of 18 whose income was below the poverty level was 14.6% in 2000, 35.8% in 2010 and 39.9% in 2017, according to U.S. Census and ACS data.

## Low- and Moderate-Income Population for the City of Bethlehem



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

The low- and moderate-income census tracts are generally located in the central and southern sections of the City. There is some overlap of higher minority concentrations in the low- and moderate income census tracts in the south-central sections of the City.

The percentage of families living in poverty experienced a decrease from 18.5% in 2010 to 11.4% in 2017, according to U.S. Census and ACS data. Female head of household, no husband present, families with related children under the age of 18 whose income was below poverty level was 46.2% in 2010, and 24.1% in 2017, according to U.S. Census and ACS data.

There was an increase in all people whose income level was below poverty level from 15.0% in 2000 to 16.8% in 2010 and then a decrease to 15.8% in 2017, according to U.S. Census and ACS data. Individuals under the age of 18 whose income was below the poverty level was 20.7% in 2000, 24.3% in 2010 and 22.2% in 2017, according to U.S. Census and ACS data.

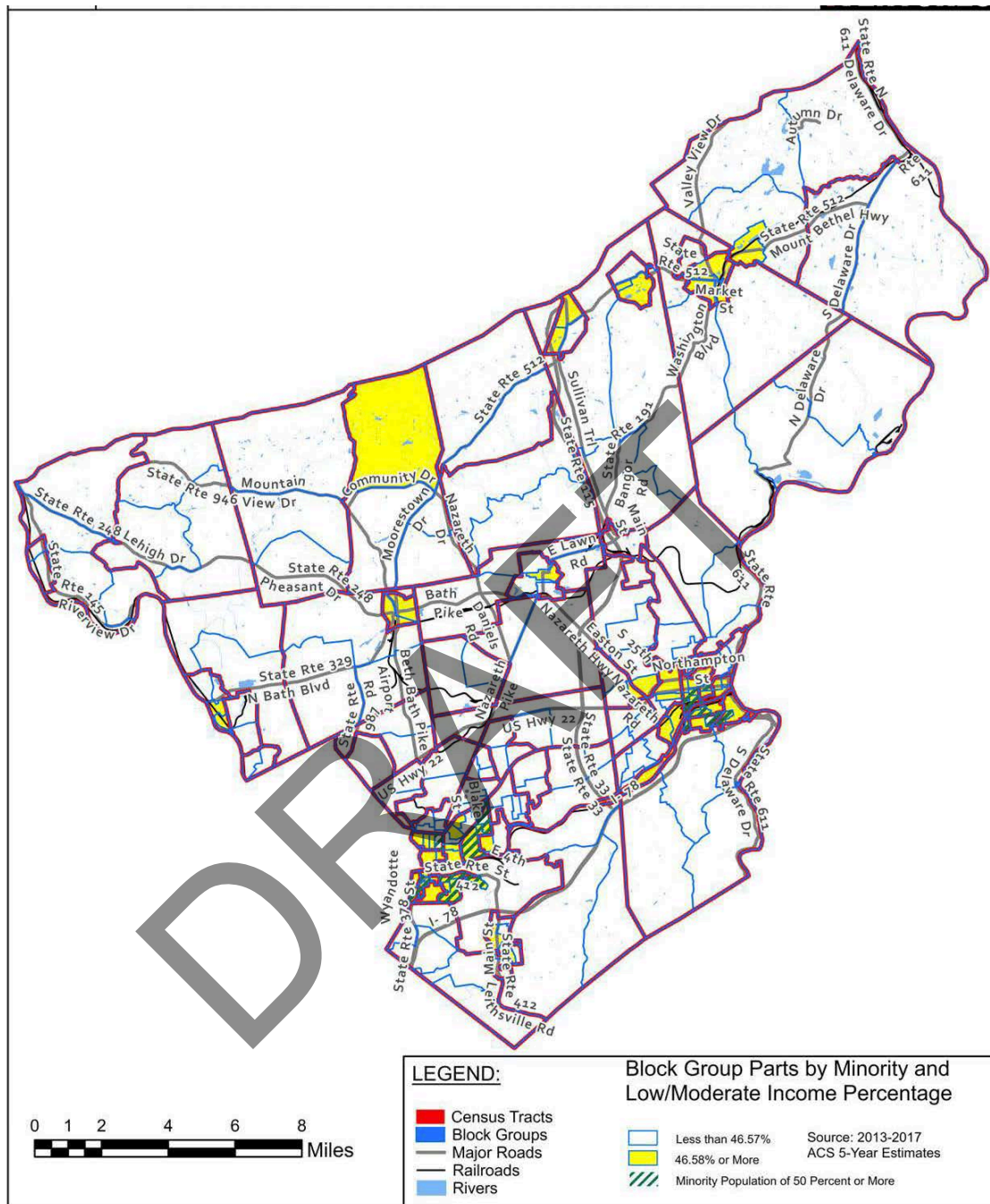




The percentage of families living in poverty experienced a decrease from 25.3% in 2010 to 14.8% in 2017, according to U.S. Census and ACS data. Female head of household, no husband present, families with related children under the age of 18 whose income was below poverty level was 41.7% in 2010, and 35.5% in 2017, according to U.S. Census and ACS data.

## Analysis of Impediments to Fair Housing Choice

## Low- and Moderate-Income Population 2019 for Northampton County



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

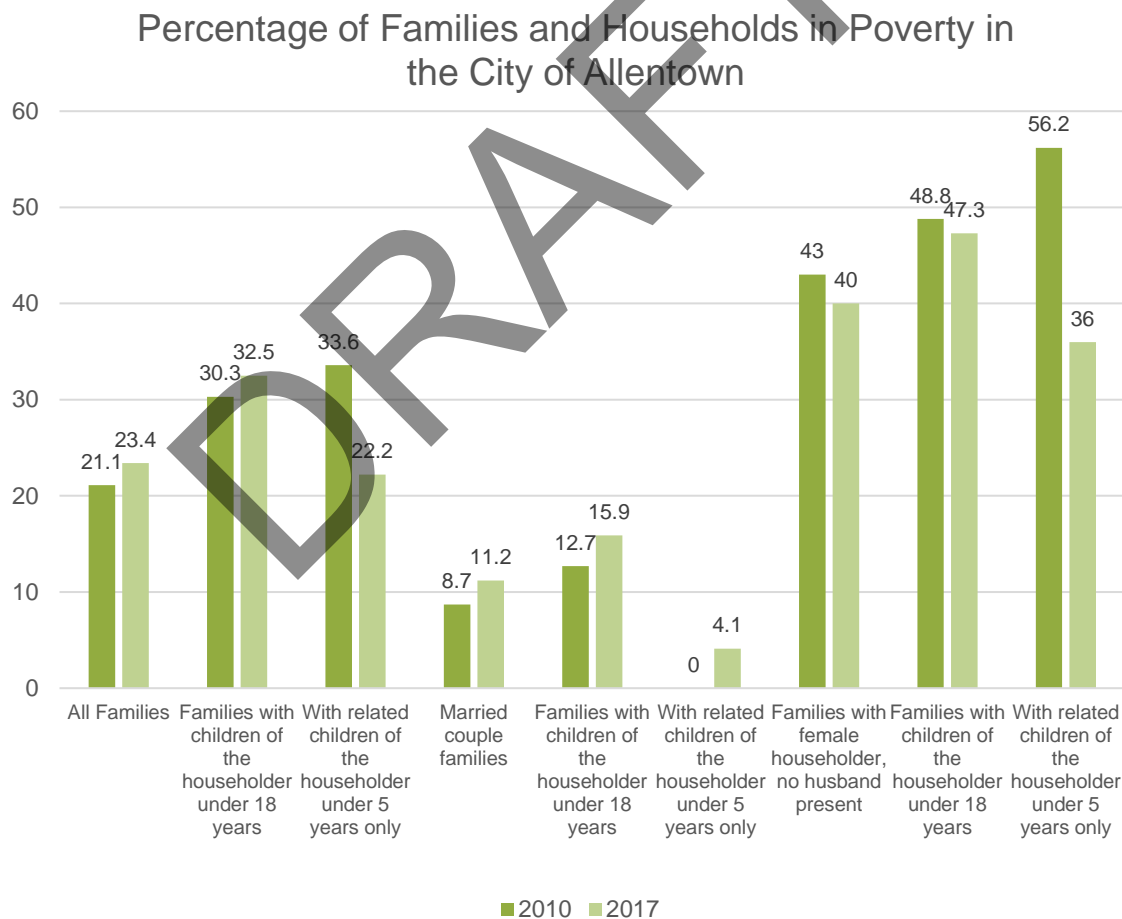
The low- and moderate-income census tracts are generally located in urban centers, though there are a string of low- and moderate-income census tracts in the northern part of the County. There is some overlap of higher minority concentrations in the low- and moderate income census tracts in the urban centers.

The percentage of families living in poverty experienced a decrease from 9.1% in 2010 to 6.6% in 2017, according to U.S. Census and ACS data. Female head of household, no husband present, families with related children under the age of 18 whose income was below poverty level was 30.5% in 2010, and 21.7% in 2017, according to U.S. Census and ACS data.

There was an increase in all people whose income level was below poverty level from 7.9% in 2000 to 8.8% in 2010 and then an additional increase to 9.2% in 2017, according to U.S. Census and ACS data. Individuals under the age of 18 whose income was below the poverty level was 9.8% in 2000, 12.0% in 2010 and 13.6% in 2017, according to U.S. Census and ACS data.

### Family and Household Poverty – Allentown

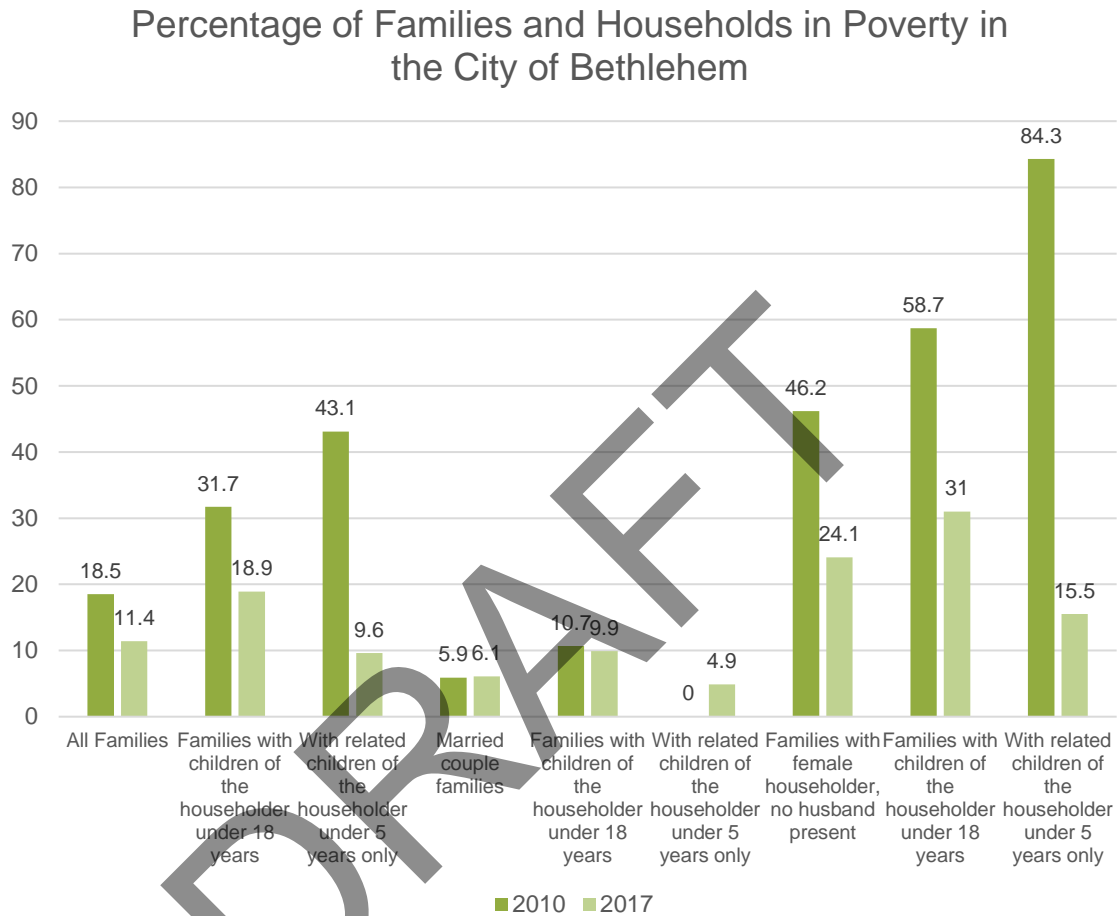
Allentown's poverty statistics for families with children are highlighted in the chart below.



Source: 2006-2010 and 2013-2017 ACS

## Family and Household Poverty – Bethlehem

Bethlehem City's poverty statistics for families with children are highlighted in the chart below.

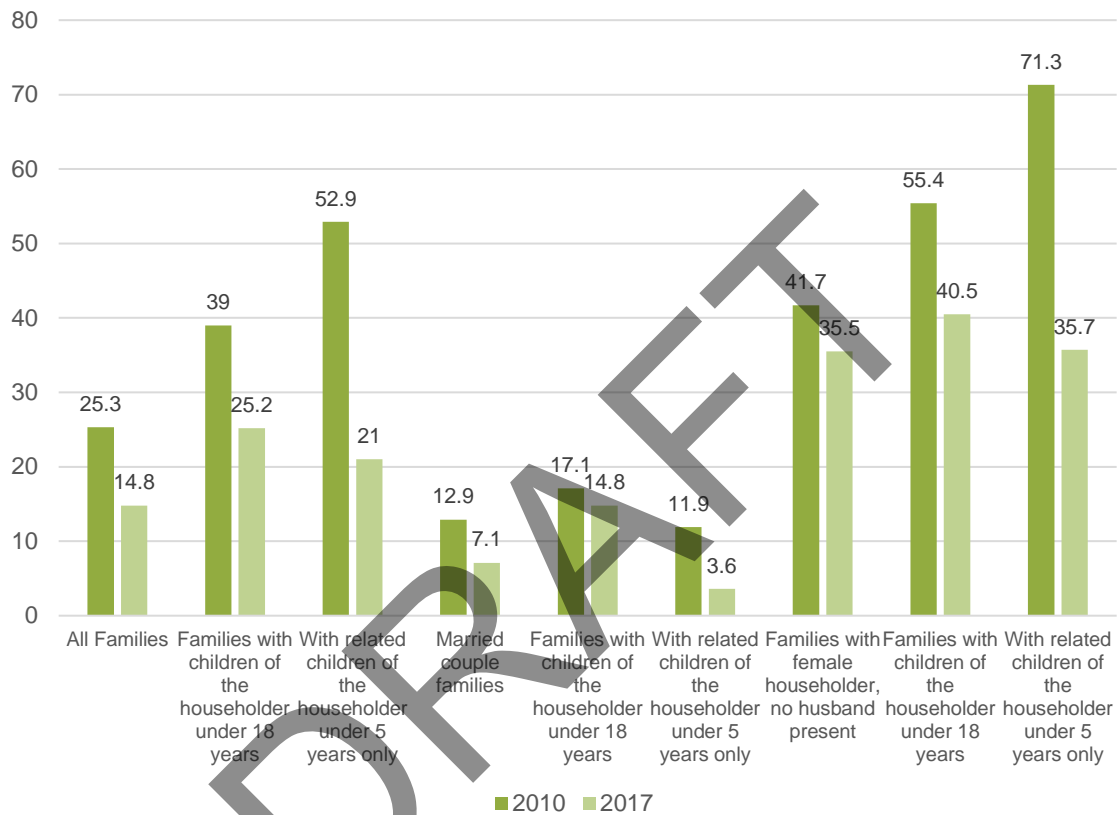


Source: 2006-2010 and 2013-2017 ACS

## Family and Household Poverty – Easton

Easton City's poverty statistics for families with children are highlighted in the chart below.

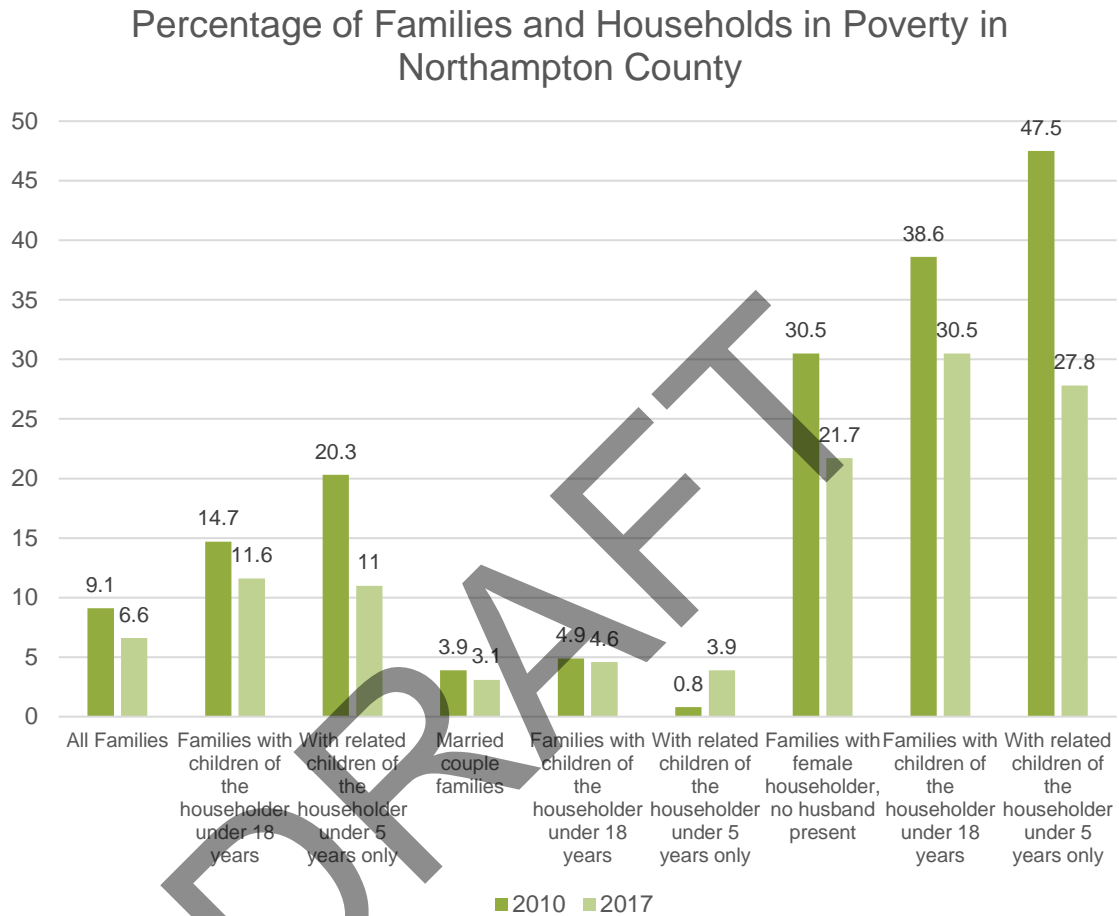
Percentage of Families and Households in Poverty in the City of Easton



Source: 2006-2010 and 2013-2017 ACS

## Family and Household Poverty – Northampton County

Northampton County's poverty statistics for families with children are highlighted in the chart below.



Source: 2006-2010 and 2013-2017 ACS

## D. Employment:

### Occupation – Allentown

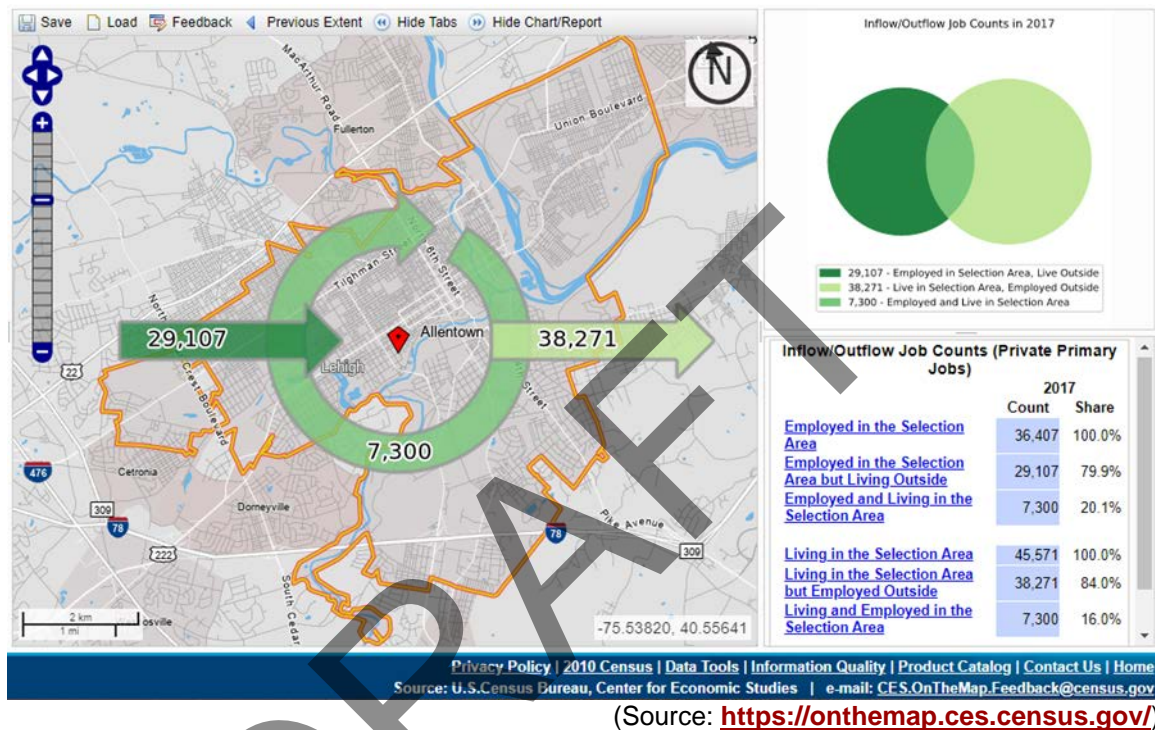
In 2010, according to 2010 ACS Estimates, the total number of eligible workers (population 16 years and over) in Allentown was 89,921 persons. In 2010, 61.9% (55,689 persons) of eligible workers were active in the labor force and 10.2% (9,160 persons) of eligible workers in the work force were unemployed.

In 2017, according to 2017 ACS Estimates, the total number of eligible workers (population 16 years and over) in Allentown was 91,604 persons. In 2017,



62.5% (57,265 persons) of eligible workers were active in the labor force and 7.7% (7,097 persons) of eligible workers in the work force were unemployed.

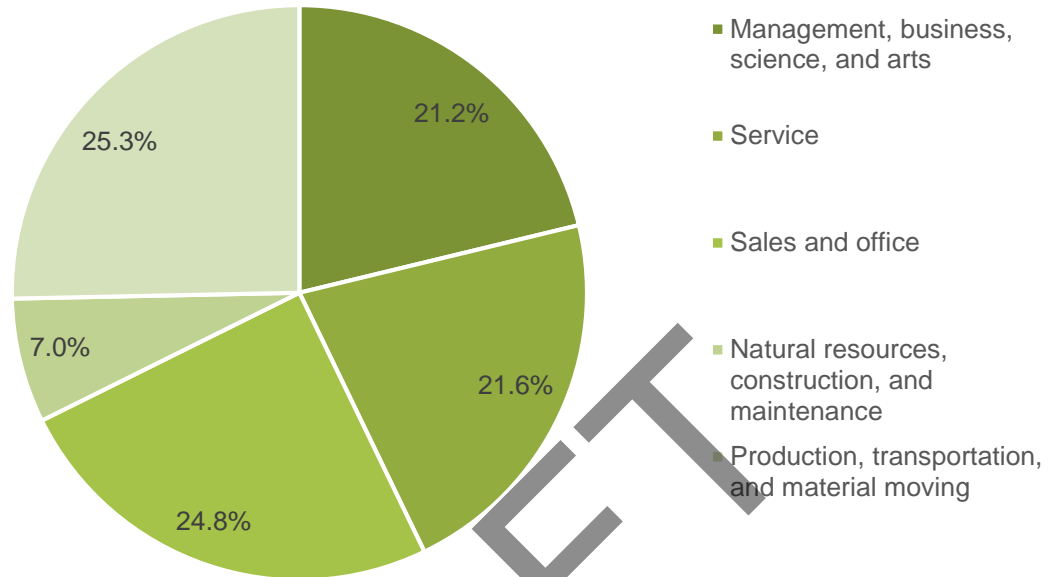
Workers in 2017 had a mean travel time to work of 23.6 minutes. The following labor market resident inflow/outflow data as of 2017 applied to the City of Allentown. There were a total of 36,407 jobs in the City and 7,300 (20.1%) of those jobs were held by residents of the City.



According to the 2013-2017 American Community Survey, an estimated 30.7 percent (12,859 households) of households in the City of Allentown receive income from Social Security. The mean Social Security Income for 2017 was \$15,481.

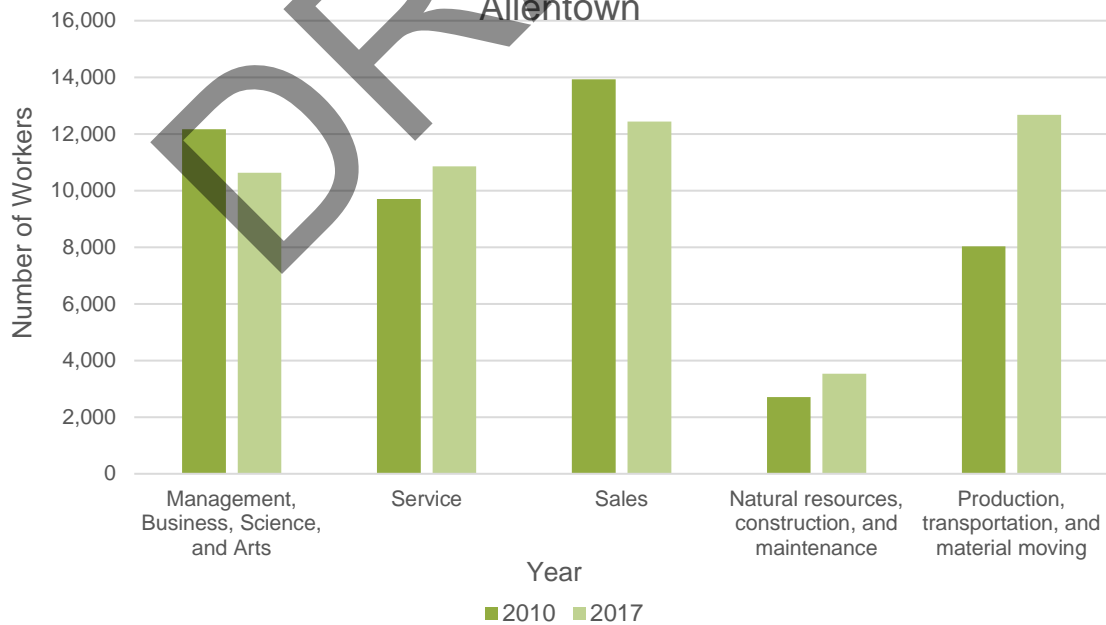
The following charts outline the distribution of Allentown workers by occupation.

### Occupations in the City of Allentown

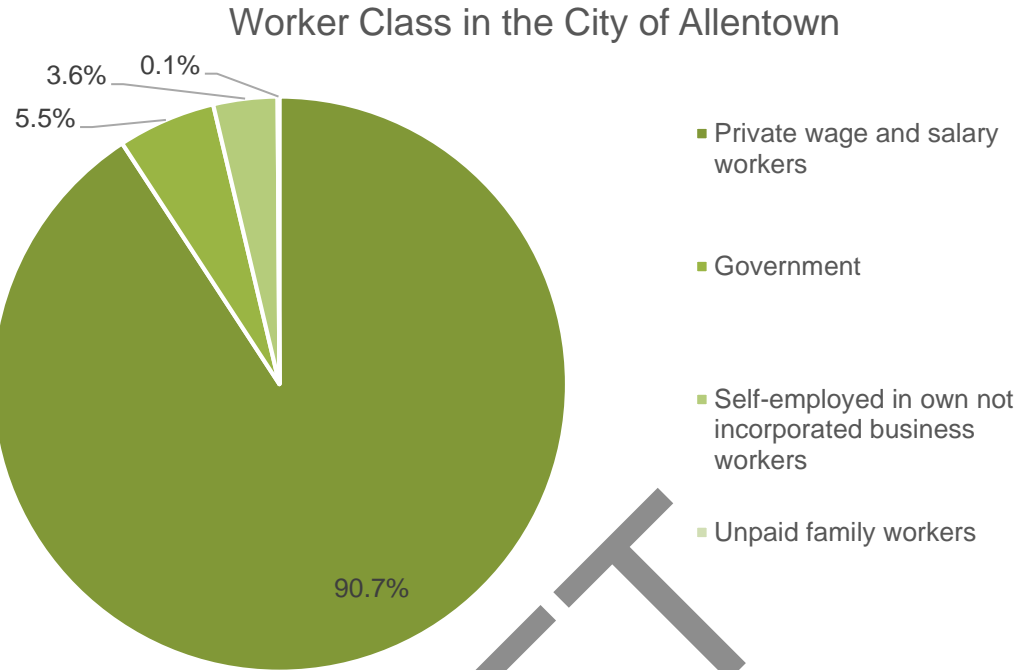


Source: 2013-2017 ACS

### Worker Distribution by Occupation in the City of Allentown



Source: 2006-2010 ACS and 2013-2017 ACS



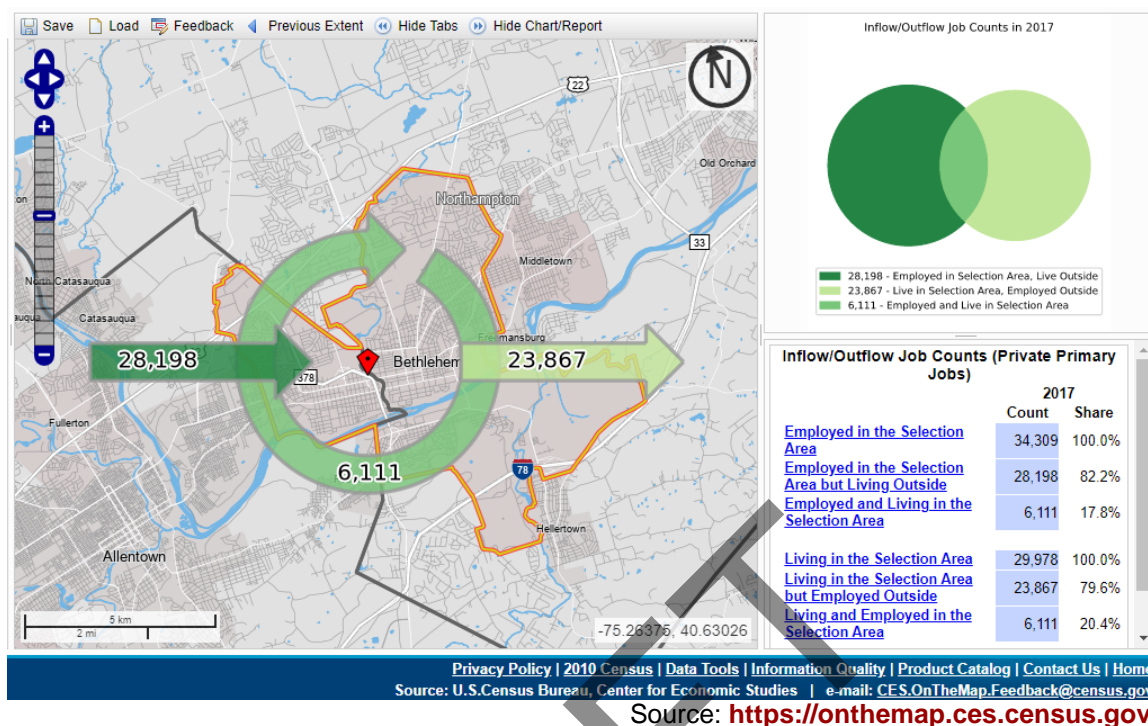
Source: 2006-2010 ACS and 2013-2017 ACS

### Occupation – Bethlehem

In 2010, according to 2010 ACS Estimates, the total number of eligible workers (population 16 years and over) in Bethlehem was 62,224 persons. In 2010, 56.1% (34,906 persons) of eligible workers were active in the labor force and 6.9% (4,295 persons) of eligible workers in the work force were unemployed.

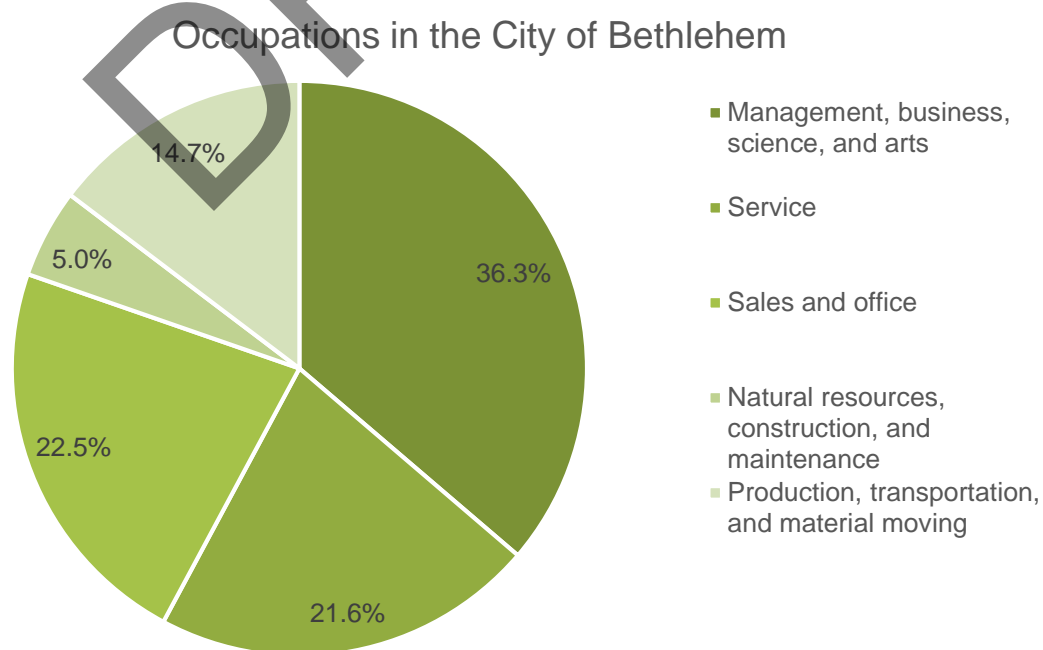
In 2017, according to 2017 ACS Estimates, the total number of eligible workers (population 16 years and over) in Bethlehem was 91,604 persons. In 2017, 62.5% (57,265 persons) of eligible workers were active in the labor force and 3.8% (2,378 persons) of eligible workers in the work force were unemployed.

Workers in 2017 had a mean travel time to work of 23.6 minutes. The following labor market resident inflow/outflow data as of 2017 applied to the City of Bethlehem. There were a total of 34,309 jobs in the City and 6,111 (17.8%) of those jobs were held by residents of the City.

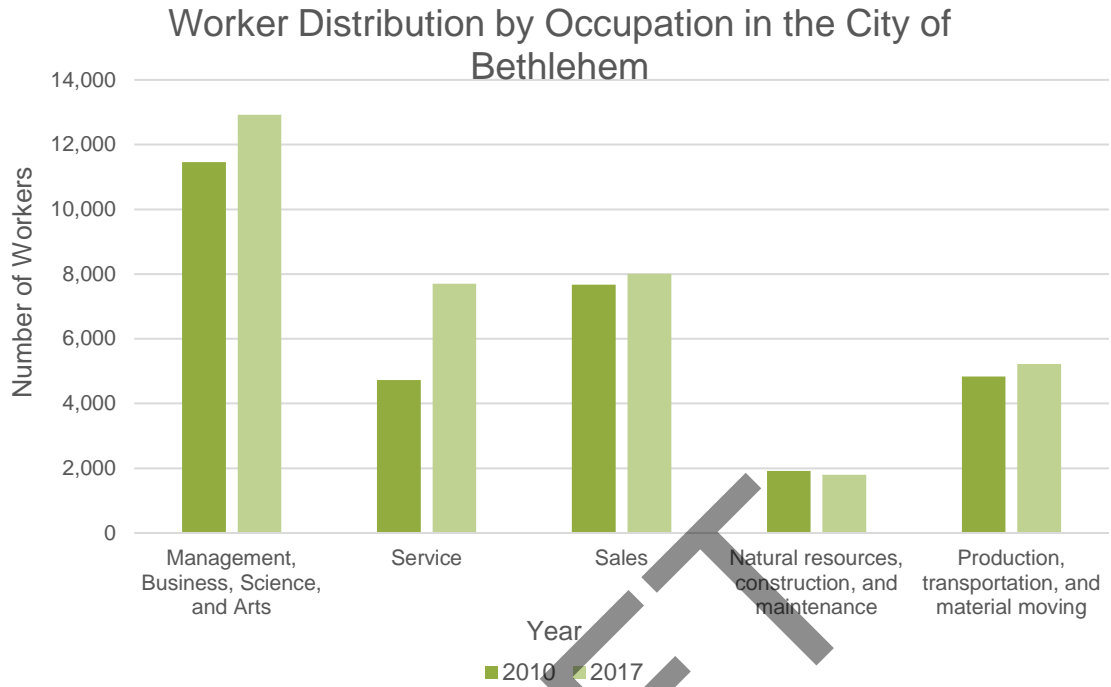


According to the 2013-2017 American Community Survey, an estimated 33% (9,560 households) of households in the City of Bethlehem receive income from Social Security. The mean Social Security Income for 2017 was \$18,503.

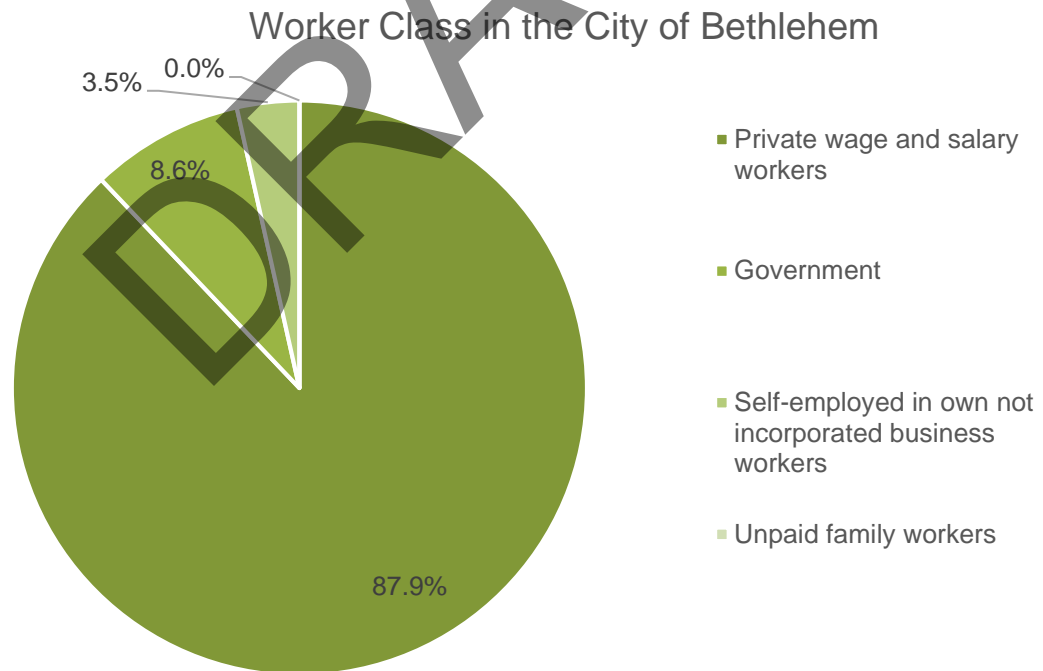
The following charts outline the distribution of Bethlehem workers by occupation.



Source: 2013-2017 ACS



Source: 2006-2010 ACS and 2013-2017 ACS



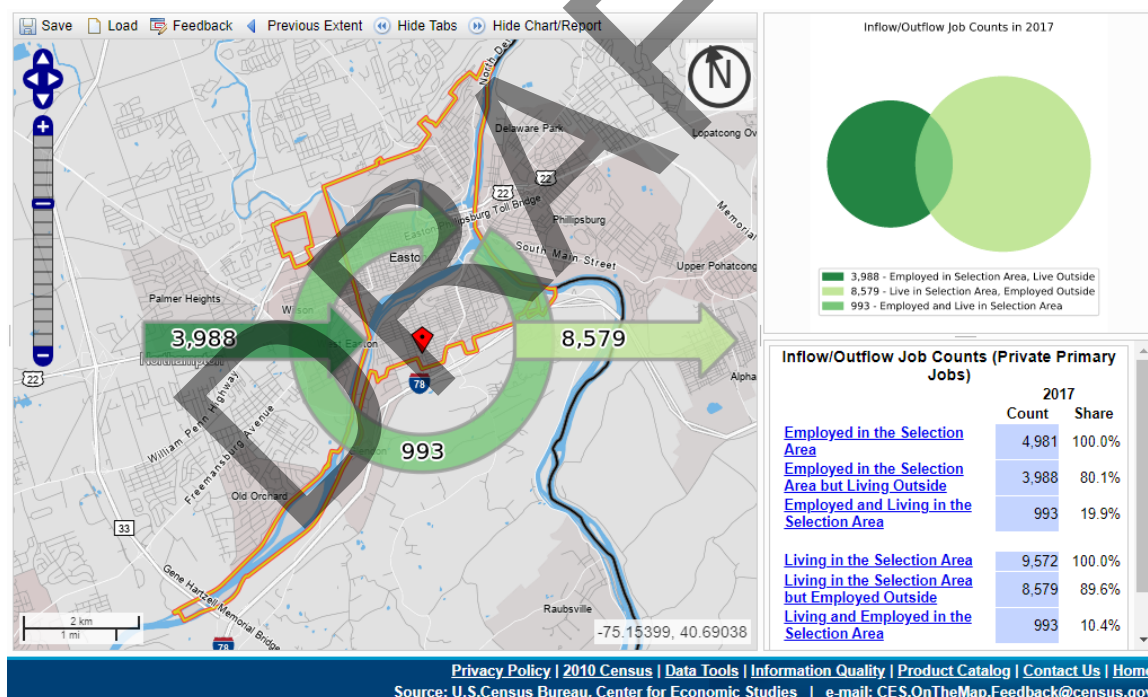
Source: 2013-2017 ACS

## Occupation – Easton

In 2010, according to 2010 ACS Estimates, the total number of eligible workers (population 16 years and over) in Easton was 22,062 persons. In 2010, 54.0 percent (11,907 persons) of eligible workers were active in the labor force and 7.3 percent (1,616 persons) of eligible workers in the work force were unemployed.

In 2017, according to 2017 ACS Estimates, the total number of eligible workers (population 16 years and over) in Easton was 22,105 persons. In 2017, 60.3 percent (13,321 persons) of eligible workers were active in the labor force and 4.5 percent (1,002 persons) of eligible workers in the work force were unemployed.

Workers in 2017 had a mean travel time to work of 24.8 minutes. The following labor market resident inflow/outflow data as of 2017 applied to the City of Easton. There were a total of 4,981 jobs in the City and 993 (19.9%) of those jobs were held by residents of the City.



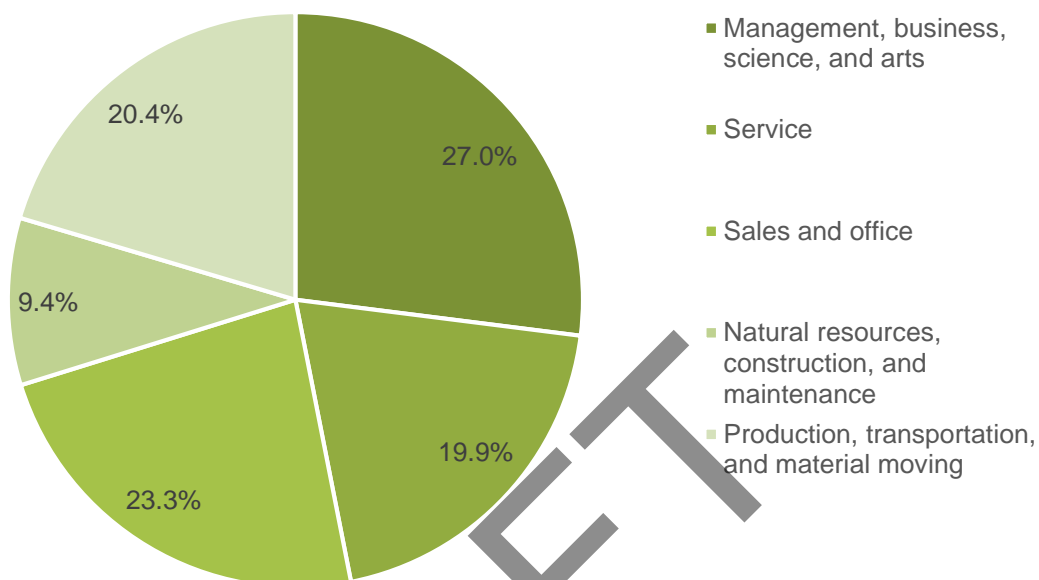
Source: <https://onthemap.ces.census.gov/>

According to the 2013-2017 American Community Survey, an estimated 30.1% (2,864 households) of households in the City of Easton receive income from Social Security. The mean Social Security Income for 2017 was \$17,311.

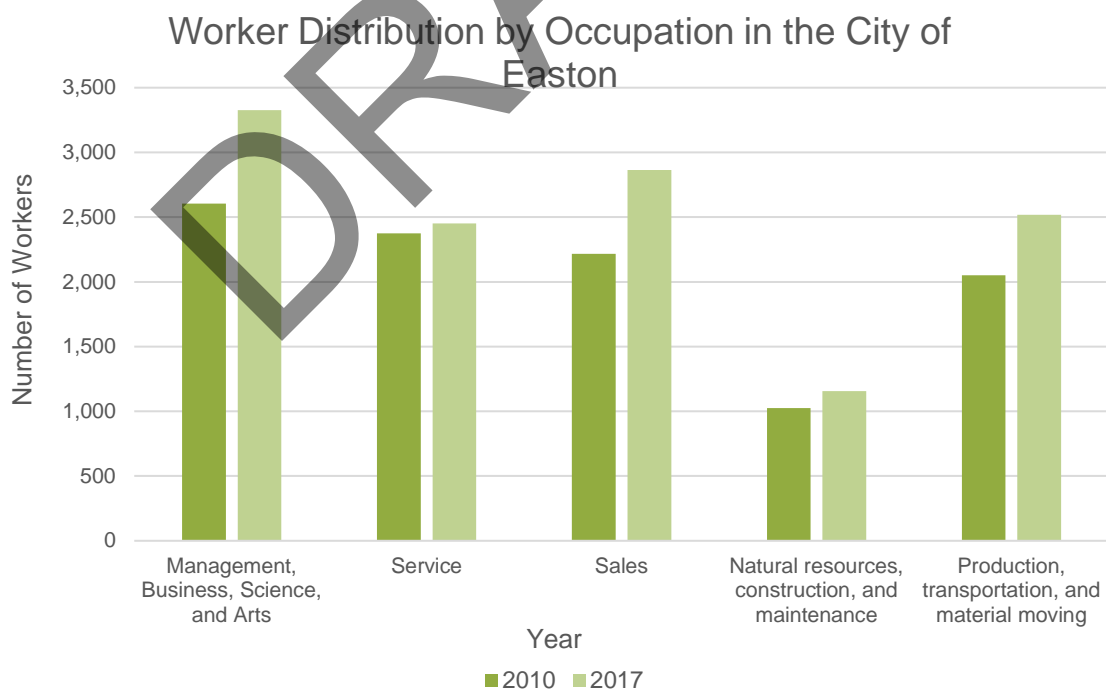


The following charts outline the distribution of Easton workers by occupation.

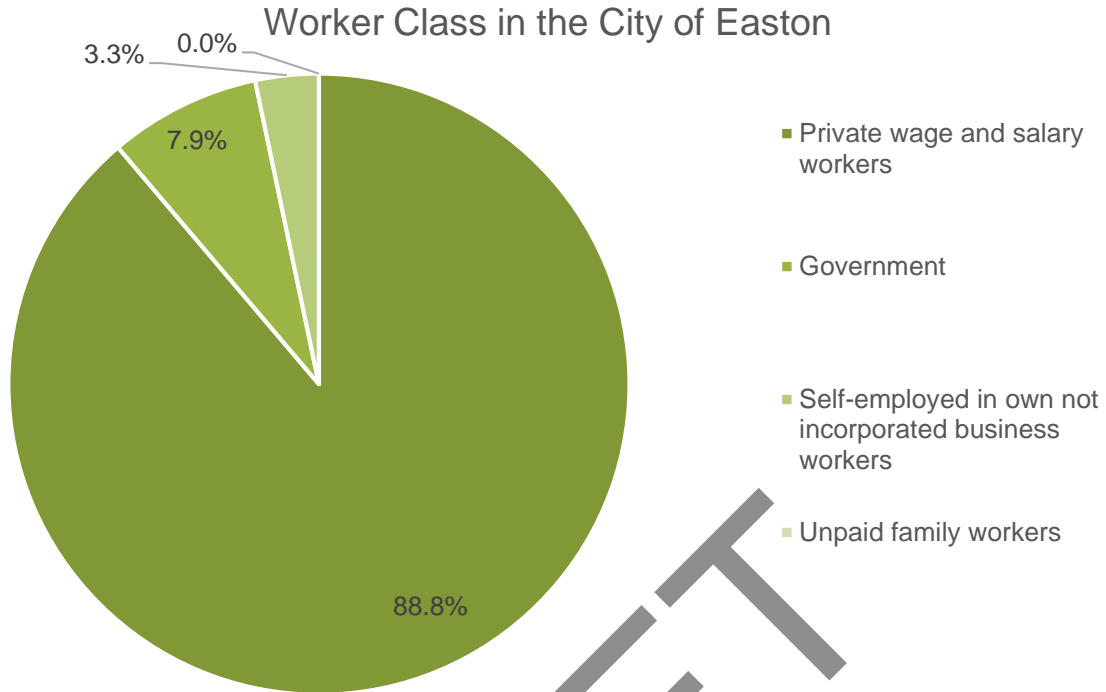
### Occupations in the City of Easton



Source: 2013-2017 ACS



Source: 2006-2010 ACS and 2013-2017 ACS



Source: 2013-2017 ACS

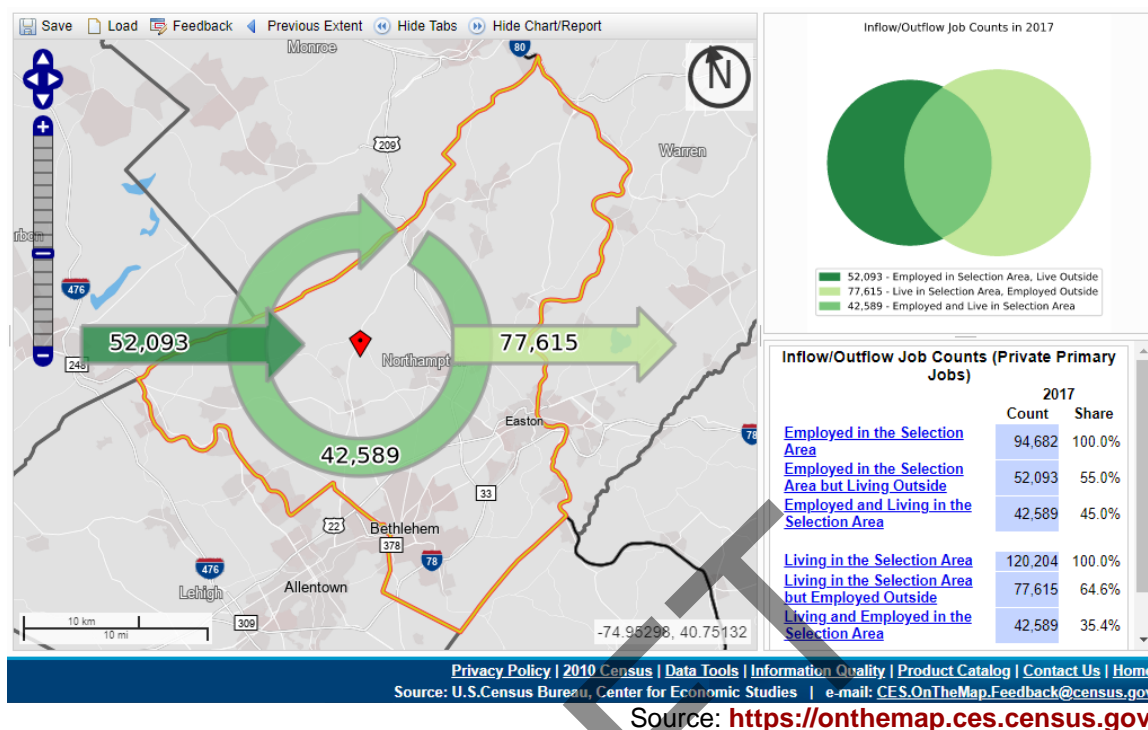
### Occupation – Northampton County

In 2010, according to 2010 ACS Estimates, the total number of eligible workers (population 16 years and over) in Northampton County was 241,347 persons. In 2010, 62.7 percent (151,388 persons) of eligible workers were active in the labor force and 6.2 percent (15,053 persons) of eligible workers in the work force were unemployed.

In 2017, according to 2017 ACS Estimates, the total number of eligible workers (population 16 years and over) in Northampton County was 246,901 persons. In 2017, 63.7 percent (157,337 persons) of eligible workers were active in the labor force and 3.7 percent (9,027 persons) of eligible workers in the work force were unemployed.

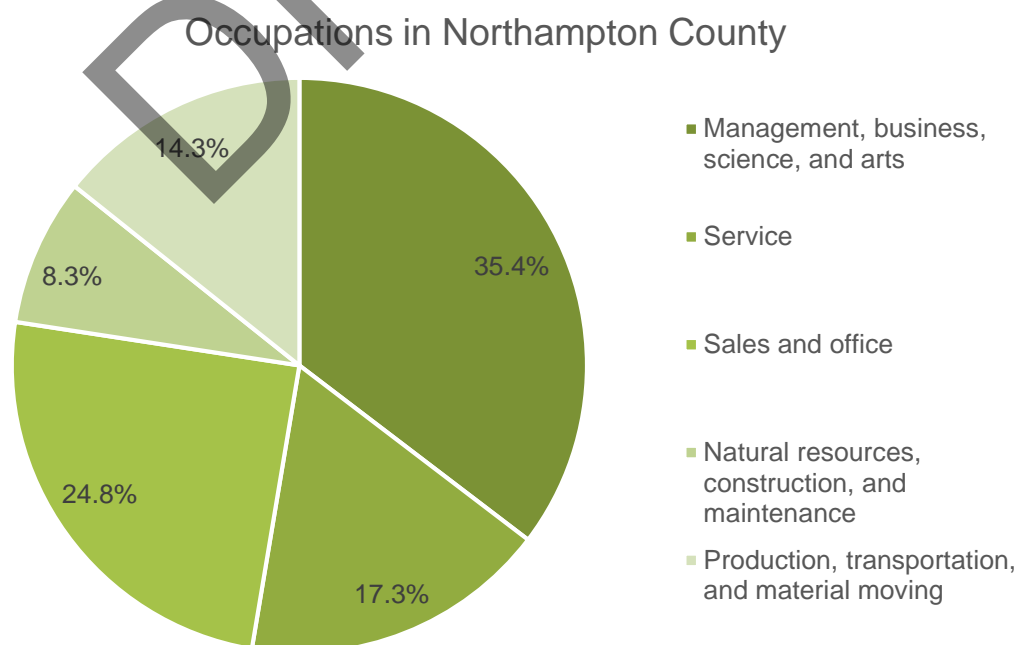
Workers in 2017 had a mean travel time to work of 27.6 minutes. The following labor market resident inflow/outflow data as of 2017 applied to Northampton County. There were a total of 94,682 jobs in the County and 42,589 (45.0%) of those jobs were held by residents of the County.



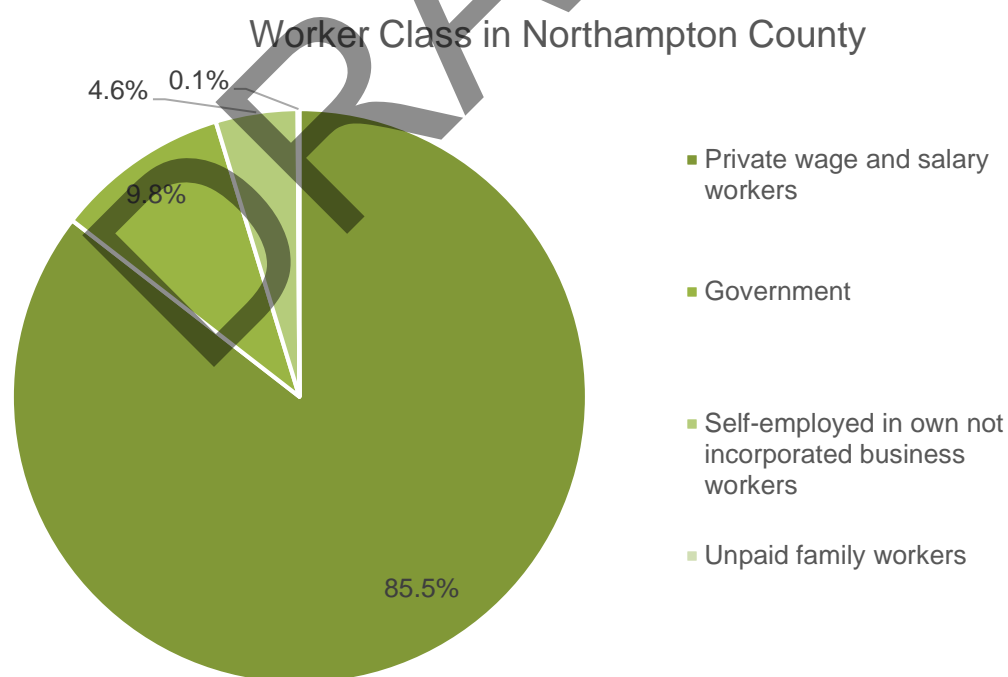
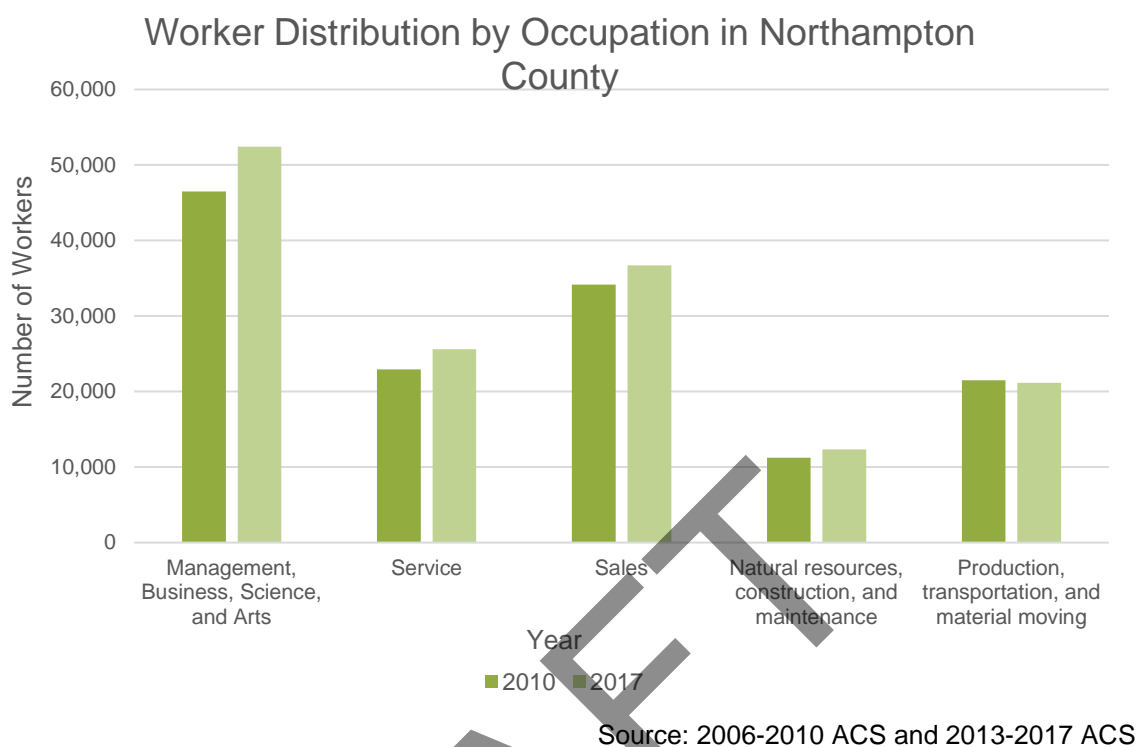


According to the 2013-2017 American Community Survey, an estimated 35.7% (40,628 households) of households in Northampton County receive income from Social Security. The mean Social Security Income for 2017 was \$20,771.

The following charts outline the distribution of Northampton workers by occupation.



Source: 2013-2017 ACS



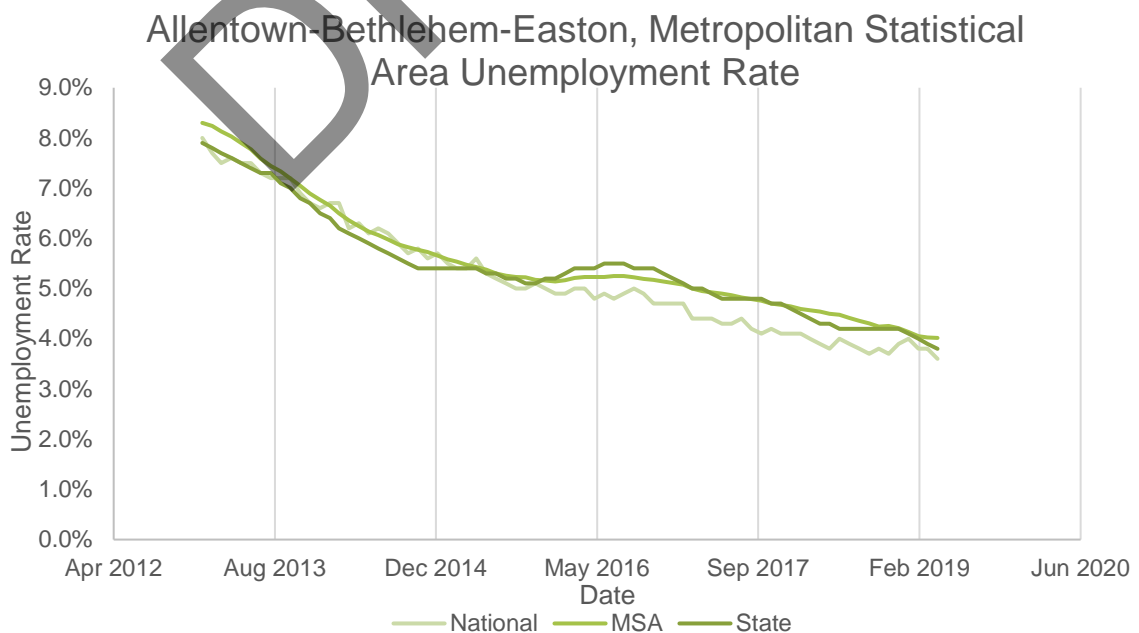
Source: 2013-2017 ACS

## Unemployment Rate – Allentown-Bethlehem-Easton, PA-NJ MSA

The unemployment rates from January 2013 to April 2019 for the City of Allentown, the City of Bethlehem, and the City of Easton are all represented by the orange “MSA” (Metropolitan Statistical Area) line because data for the individual cities are not available. The most localized available data set that represents the individual cities is the collective count for all three cities which is the Metropolitan Statistical Area. The Allentown-Bethlehem-Easton, PA-NJ Metropolitan Statistical Area data was provided by the St. Louis FRED Database as non-seasonally adjusted, so manual adjustment was required for comparison. The MSA data was only available as non-seasonally adjusted data, which is problematic when the objective is to compare said data to other data that is seasonally adjusted. The non-seasonally adjusted MSA data was manually adjusted to be seasonally adjusted by using weighting each data point against a moving pre-6<sup>th</sup> month and post-6<sup>th</sup> month average. By weighting each data point against a moving average, the data becomes seasonally adjusted by eliminating the consistent and cyclical increase in unemployment that is observed during the December-January-February month time frame.

The unemployment rate for the Commonwealth of Pennsylvania is represented by the blue “State” line. The state data was provided by the Bureau of Labor Statistics as seasonally adjusted, so manual adjustment was not required for comparison.

The national unemployment rate is represented by the red “National” line. The national data was provided by the Bureau of Labor Statistics as seasonally adjusted, so manual adjustment was not required for comparison.



Source: Bureau of Labor Statistics and St. Louis FRED Database

From January 2013 to May 2015, the MSA unemployment rate was slightly higher (an average of 1%) than the state unemployment rate and was on average with the national unemployment rate. All three unemployment rates trended downwards at roughly the same rate until approximately May 2015, at which point the state unemployment rate and the MSA unemployment rate remained steady between 5.0% and 6.0% until approximately May 2017 at which point the state and MSA unemployment rates dropped below 5.0%.

The trends suggest that since May 2016, the economic situation in the Commonwealth of Pennsylvania and in the Allentown-Bethlehem-Easton Metropolitan Statistical Area lagged the national average. Unemployment in Pennsylvania and the MSA remained higher than the national average through April 2019. Since June 2017, the unemployment rate in the Metropolitan Statistical Area has remained higher than the rate in the state and the national rate, suggesting that the MSA might not be benefiting from pro-growth policies as compared to the other regions.

Additionally, as of April 2019, both the national and the state unemployment level had dropped below 4.0%, whereas the MSA unemployment level remained above 4.0%. The slope of the MSA unemployment rate trendline is flatter than the slopes of the national and state trendlines, which could suggest that there will be further separation between the MSA unemployment rate and the state and national unemployment rates in the future.

## **E. Housing Profile:**

### **Housing Profile – Allentown**

Over one-third (35.9%, 15,060 units) of Allentown City's housing stock was built prior to 1939, which is now over 80 years old. The second largest grouping (25.0%, 10,497 units) of Allentown City's housing stock was built from 1940 to 1959.

The following table chart details the year that housing structures were built in the City of Allentown as of 2017.

**Year Structure Built in the City of Allentown**

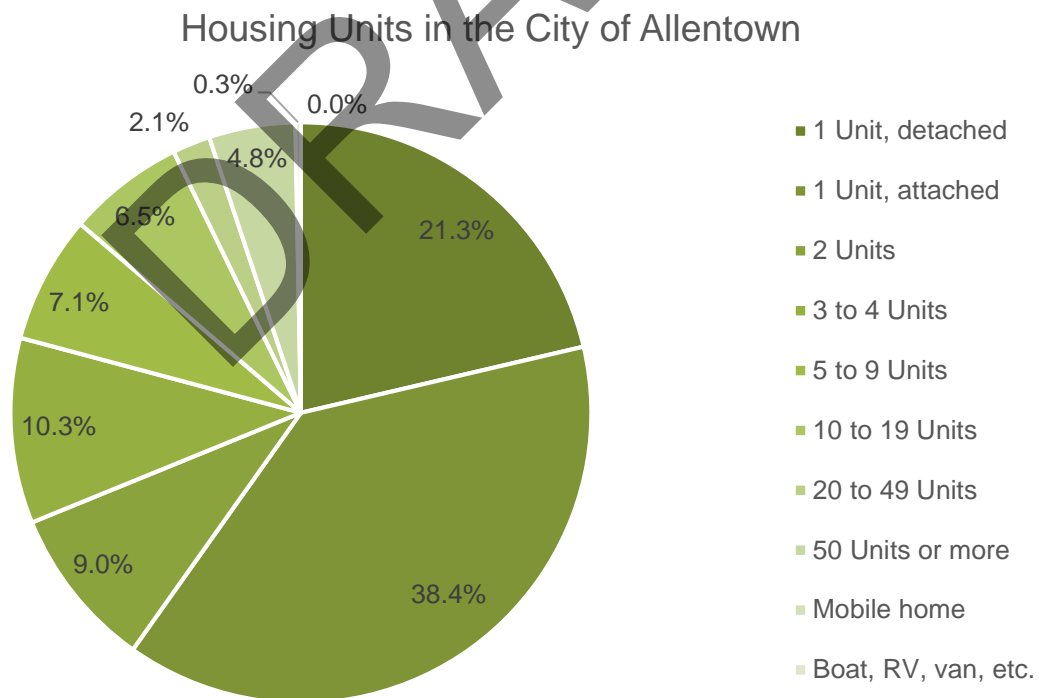
<b>Year Structure Built</b>	<b>Number</b>	<b>Percentage</b>
Built 2014 or Later	112	0.3%
Built 2010 to 2013	579	1.4%

Built 2000 to 2009	2,357	5.6%
Built 1980 to 1999	3,713	8.9%
Built 1960 to 1979	9,617	22.9%
Built 1940 to 1959	10,497	25.0%
Built 1939 or Earlier	15,060	35.9%
<b>Total</b>	<b>41,935</b>	<b>-</b>

Source: 2013-2017 ACS

The majority of housing units in the City of Allentown are 1-unit attached comprising 38.4% (17,603 units) of housing units. Multifamily residential structures of 10 or more units represent 13.5% (6,168 units) of housing units.

The following graph illustrates the composition of the housing stock in the City of Allentown as of 2017.



Source: 2013-2017 ACS

## Housing Profile – Bethlehem

Slightly under one-third (29.0%, 8,381 units) of Bethlehem's housing stock was built prior to 1939, which is now over 80 years old. The second largest grouping (28.8%, 6,868 units) of Bethlehem's housing stock was built from 1940 to 1959.

The following table chart details the year that housing structures were built in the City of Bethlehem as of 2017.

**Year Structure Built in the City of Bethlehem**

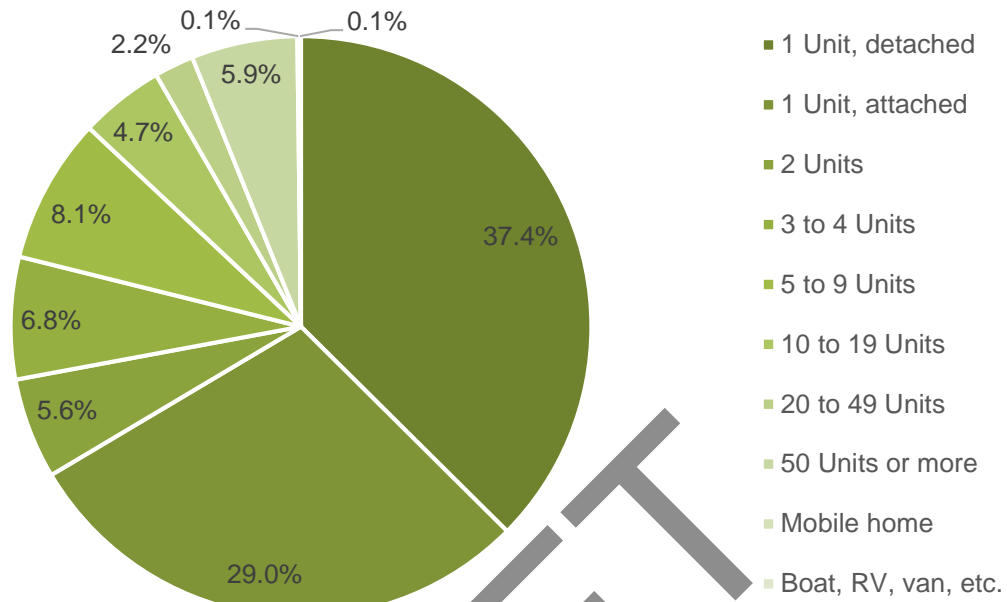
Year Structure Built	Number	Percentage
Built 2014 or Later	83	0.3%
Built 2010 to 2013	89	0.3%
Built 2000 to 2009	1,591	5.5%
Built 1980 to 1999	3,601	12.4%
Built 1960 to 1979	6,868	23.7%
Built 1940 to 1959	8,323	28.8%
Built 1939 or Earlier	8,381	29.0%
<b>Total</b>	<b>28,936</b>	<b>-</b>

Source: 2013-2017 ACS

The majority of housing units in the City of Bethlehem are 1-unit detached comprising 37.4% (11,701 units) of housing units. Multifamily residential structures of 10 or more units represent 12.8% (4,006 units) of housing units.

The following graph illustrates the composition of the housing stock in the City of Bethlehem as of 2017.

### Housing Units in the City of Bethlehem



Source: 2013-2017 ACS

### Housing Profile – Easton

Almost two-thirds (61.8%, 5,880 units) of Easton's housing stock was built prior to 1939, which is now over 80 years old. The second largest grouping (15.8%, 1,505 units) of Easton's housing stock was built from 1940 to 1959.

The following table chart details the year that housing structures were built in the City of Easton as of 2017.

#### Year Structure Built in the City of Easton

Year Structure Built	Number	Percentage
Built 2014 or Later*	26	0.3%
Built 2010 to 2013	37	0.4%
Built 2000 to 2009	195	2.0%
Built 1980 to 1999	800	8.4%
Built 1960 to 1979	1,078	11.3%

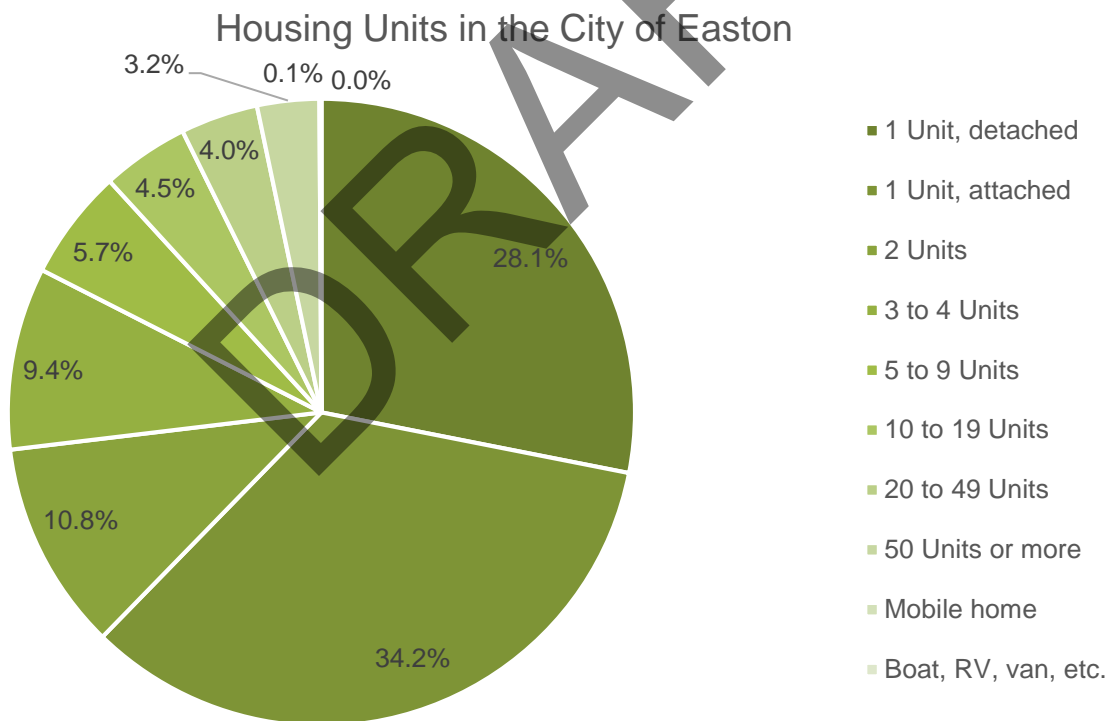
Built 1940 to 1959	1,505	15.8%
Built 1939 or Earlier	5,880	61.8%
<b>Total</b>	<b>9,521</b>	<b>-</b>

Source: 2013-2017 ACS

The majority of housing units in the City of Easton are 1-unit attached comprising 34.2% (3,807 units) of housing units. Multifamily residential structures of 10 or more units represent 11.7% (1,304 units) of housing units.

*\* Between 2010 and 2013, under the HOPE 6 Project, the Housing Authority built 53 structures containing 128 housing units. The table data above are estimates created by the U.S. Census Department and may not be representative of all construction activity.*

The following graph illustrates the composition of the housing stock in the City of Easton as of 2017.



Source: 2013-2017 ACS

### Housing Profile – Northampton County

Under one-third (25.6%, 29,157 units) of Northampton County's housing stock was built prior to 1939, which is now over 80 years old. The second largest



grouping (21.5%, 24,433 units) of Northampton County's housing stock was built from 1980 to 1999.

The following table chart details the year that housing structures were built in Northampton County as of 2017.

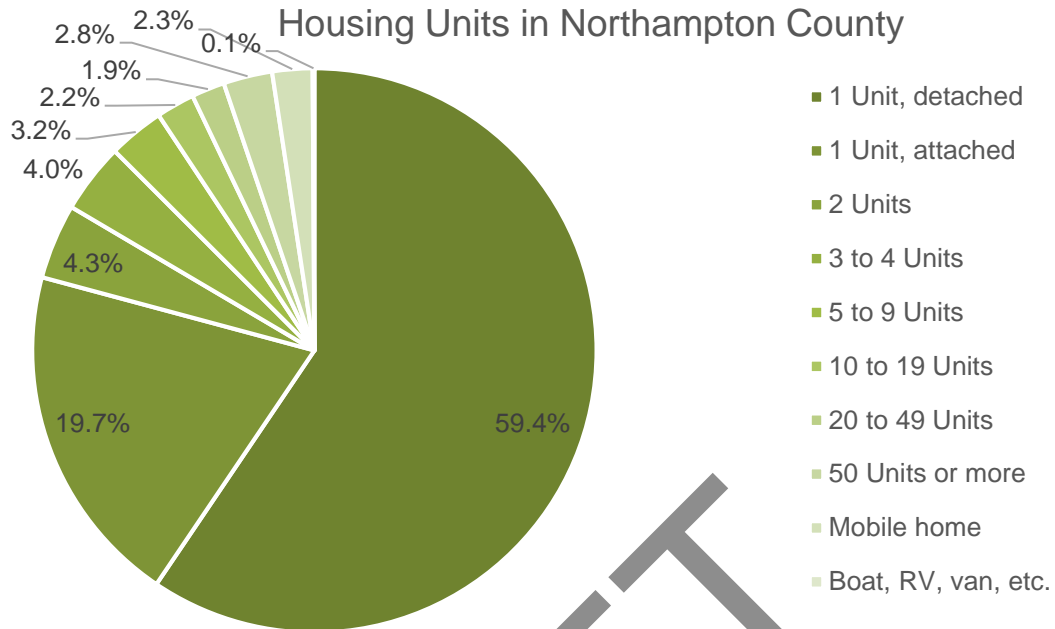
**Year Structure Built in Northampton County**

Year Structure Built	Number	Percentage
Built 2014 or Later	573	0.5%
Built 2010 to 2013	1,457	1.3%
Built 2000 to 2009	14,507	12.7%
Built 1980 to 1999	24,433	21.5%
Built 1960 to 1979	23,746	20.9%
Built 1940 to 1959	19,954	17.5%
Built 1939 or Earlier	29,157	25.6%
<b>Total</b>	<b>113,827</b>	<b>-</b>

Source: 2013-2017 ACS

The majority of housing units in Northampton County are 1-unit detached comprising 59.4% (72,731 units) of housing units. Multifamily residential structures of 10 or more units represent 6.9% (8,491 units) of housing units.

The following graph illustrates the composition of the housing stock in Northampton County as of 2017.



Source: 2013-2017 ACS

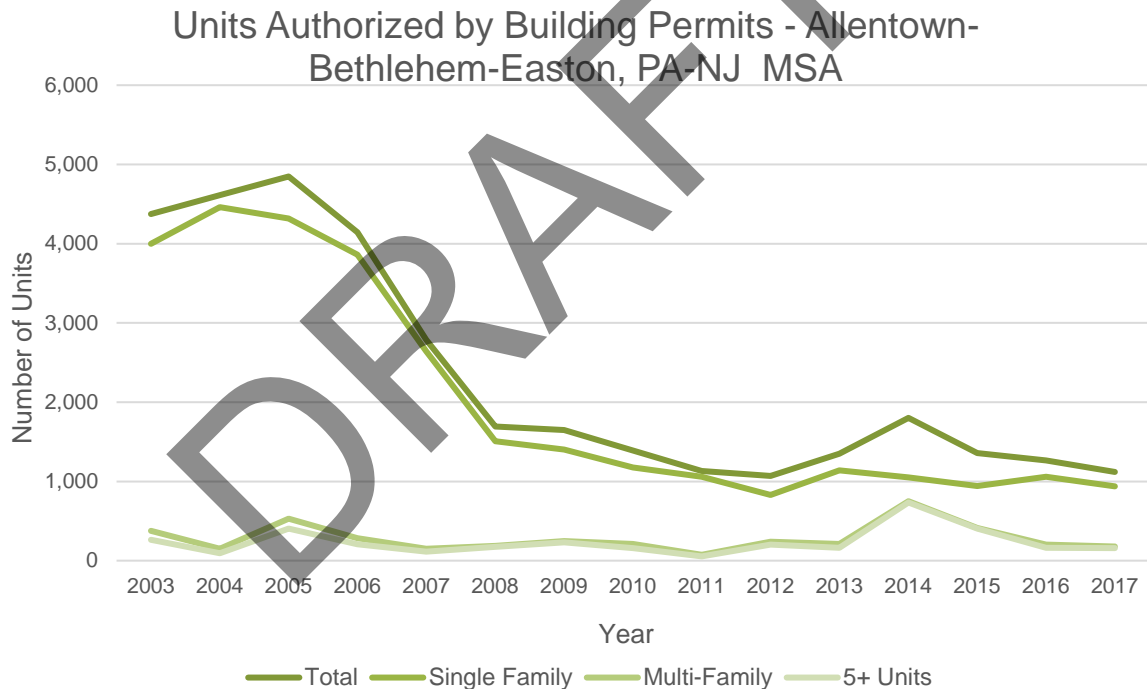
The table below contains data on the number of permits for residential construction issued by jurisdictions in the Allentown-Bethlehem-Easton, PA-NJ Metropolitan Statistical Area which includes the cities of Allentown, Bethlehem, and Easton.

**Units Authorized by Building Permits –  
Allentown-Bethlehem-Easton, PA-NJ MSA**

YEAR	Total	Single Family	Multi-Family	5+ Units
2017	1,118	938	180	158
2016	1,263	1,059	204	163
2015	1,356	943	413	406
2014	1,801	1,051	750	734
2013	1,350	1,139	211	164
2012	1,069	829	240	203
2011	1,133	1,059	74	54
2010	1,388	1,177	211	160

2009	1,648	1,401	247	232
2008	1,694	1,508	186	174
2007	2,789	2,640	149	115
2006	4,144	3,860	284	206
2005	4,848	4,319	529	403
2004	4,612	4,461	151	93
2003	4,376	3,999	377	262

Source: SOCDS Building Permits Database, HUD



Source: SOCDS Building Permits Database, HUD

The area has seen an overall decrease in the total number of new units constructed; most notably for single family homes. Across the 15-year period, an average of 85.0% of new units each year were for single family units. As such, the trends seen in the total number of units authorized is very closely correlated with number of single-family units authorized, with the year 2014 being the exception. Multi-family units and 5+ units have remained relatively level over the past fifteen years with a massive spike in 2014.

The minimum points in the data were all between the years of 2011 and 2012, which aligns with the general lowest point in the national economy following the housing market crash of 2008-2009. The year with the highest number of units authorized was 2005 and the year with the highest number of single-family units was 2004. The average number of total units authorized per year in the years following the 2008-2009 housing crash are only one-fourth the average number of total units authorized per year in the years preceding the 2008-2009 housing crash. In general, this data would suggest that the Allentown-Bethlehem-Easton Metropolitan Statistical Area housing market has not fully recovered from the 2008-2009 market collapse.

## F. Housing Costs:

### Owner Costs – Allentown

The median monthly housing cost for owner-occupied households was \$887 in 2000; \$1,013 in 2010; and \$1,029 in 2017. The median monthly housing cost for owner-occupied households increased by 14.2% (\$126) from 2000 to 2010, increased by 1.58% (\$16) from 2010 to 2017, and overall increased by 16.0% (\$142) from 2000 to 2017.

The following table illustrates mortgage status and selected monthly owner costs in 2010 and 2017.

**Monthly Owner Costs in the City of Allentown**

Monthly Owner Cost	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	21,819	49.9%	18,195	43.4%
Less than \$300	1,047	4.8%	621	3.4%
\$300 to \$499	3,207	14.7%	2,168	11.9%
\$500 to \$799	3,818	17.5%	3,842	21.1%
\$800 to \$999	2,684	12.3%	2,087	11.5%
\$1,000 to \$1,499	5,695	26.1%	5,962	32.8%

\$1,500 to \$1,999	3,535	16.2%	2,245	12.3%
\$2,000 or more	1,833	8.4%	1,270	6.9%
No Cash Rent	-	-	-	-
Median (dollars)	\$1,013	-	\$1,029	-

Source: 2006-2010 and 2013-2017 American Community Survey

The following table illustrates housing costs for owner-households in 2010 and 2017 according to the 2006-2010 ACS and the 2013-2017 ACS.

**Monthly Owner Costs as a Percentage of Household Income  
in the City of Allentown**

Owner Costs as a % of Income	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	21,819	49.9%	18,195	43.4%
<b>Less than \$20,000</b>	<b>2,793</b>	<b>12.8%</b>	<b>2,189</b>	<b>12.0%</b>
Less than 20 percent	175	0.8%	126	0.7%
20 to 29 percent	415	1.9%	182	1.0%
30 percent or more	2,204	10.1%	1,881	10.3%
<b>\$20,000 to \$34,999</b>	<b>3,687</b>	<b>16.9%</b>	<b>2,716</b>	<b>14.9%</b>
Less than 20 percent	720	3.3%	614	3.4%
20 to 29 percent	720	3.3%	465	2.6%
30 percent or more	2,269	10.4%	1,637	9.0%
<b>\$35,000 to \$49,999</b>	<b>3,753</b>	<b>17.2%</b>	<b>2,882</b>	<b>15.8%</b>
Less than 20 percent	1,025	4.7%	864	4.7%
20 to 29 percent	1,200	5.5%	928	5.1%

30 percent or more	1,527	7.0%	1,090	6.0%
<b>\$50,000 to \$74,999</b>	<b>5,084</b>	<b>23.3%</b>	<b>4,481</b>	<b>24.6%</b>
Less than 20 percent	2,138	9.8%	2,027	11.1%
20 to 29 percent	1,876	8.6%	1,635	9.0%
30 percent or more	1,069	4.9%	819	4.5%
<b>\$75,000 or more</b>	<b>6,437</b>	<b>29.5%</b>	<b>5,864</b>	<b>32.2%</b>
Less than 20 percent	4,320	19.8%	4,367	24.0%
20 to 29 percent	1,767	8.1%	1,269	7.0%
30 percent or more	349	1.6%	228	1.3%
Zero or negative income	87	0.4%	63	0.3%
No cash rent	-	-	-	-

Source: 2006-2010 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30% or more of its monthly income on housing costs. In 2010, 34.0% (7,418 units) of owner-occupied units were cost burdened and 31.1% (5,655 units) of owner-occupied households in 2017 were cost burdened.

### Renter Costs – Allentown

The median monthly housing cost for renter-occupied households was \$786 in 2010; and \$938 in 2017. The median monthly housing cost for renter-occupied households increased by 19.3% (\$152) from 2010 to 2017.

The following table illustrates mortgage status and selected monthly renter costs in 2010 and 2017.

### Selected Monthly Renter Costs in the City of Allentown

Monthly Renter Cost	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage

Renter-Occupied Housing Units	21,919	50.1%	23,740	56.6%
Less than \$300	1,666	7.6%	1,208	5.1%
\$300 to \$499	1,732	7.9%	1,346	5.7%
\$500 to \$799	7,891	36.0%	4,730	19.9%
\$800 to \$999	4,822	22.0%	6,253	26.3%
\$1,000 to \$1,499	4,822	22.0%	7,921	33.4%
\$1,500 to \$1,999	460	2.1%	1,488	6.3%
\$2,000 or more	110	0.5%	253	1.1%
No Cash Rent	416	1.9%	541	2.3%
Median (dollars)	\$786	-	\$938	-

Source: 2006-2010 and 2013-2017 American Community Survey

The following table illustrates housing costs for owner-households in 2010 and 2017 according to the 2006-2010 ACS and the 2013-2017 ACS.

**Selected Monthly Renter Costs as a Percentage of Household Income  
in the City of Allentown**

Renter Costs as a % of Income	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	21,919	50.1%	23,740	56.6%
<b>Less than \$20,000</b>	<b>8,351</b>	<b>38.1%</b>	<b>8,082</b>	<b>34.0%</b>
Less than 20 percent	285	1.3%	216	0.9%
20 to 29 percent	811	3.7%	687	2.9%
30 percent or more	7,255	33.1%	7,179	30.2%

<b>\$20,000 to \$34,999</b>	<b>5,326</b>	<b>24.3%</b>	<b>5,149</b>	<b>21.7%</b>
Less than 20 percent	197	0.9%	212	0.9%
20 to 29 percent	833	3.8%	639	2.7%
30 percent or more	4,274	19.5%	4,298	18.1%
<b>\$35,000 to \$49,999</b>	<b>3,682</b>	<b>16.8%</b>	<b>3,145</b>	<b>13.2%</b>
Less than 20 percent	592	2.7%	392	1.7%
20 to 29 percent	1,973	9.0%	1,242	5.2%
30 percent or more	1,118	5.1%	1,511	6.4%
<b>\$50,000 to \$74,999</b>	<b>2,060</b>	<b>9.4%</b>	<b>3,637</b>	<b>15.3%</b>
Less than 20 percent	1,140	5.2%	1,510	6.4%
20 to 29 percent	767	3.5%	1,583	6.7%
30 percent or more	153	0.7%	544	2.3%
<b>\$75,000 or more</b>	<b>1,534</b>	<b>7.0%</b>	<b>2,542</b>	<b>10.7%</b>
Less than 20 percent	1,381	6.3%	2,124	8.9%
20 to 29 percent	132	0.6%	397	1.7%
30 percent or more	0	0.0%	21	0.1%
Zero or negative income	592	2.7%	644	2.7%
No cash rent	416	1.9%	541	2.3%

Source: 2006-2010 and 2013-2017 American Community Survey

**Gross Rent as a Percentage of Household Income in the City of Allentown**

Rental Cost as a % of Income	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage



Rental Units paying rent	20,921	95.4%	22,555	95.0%
Less than 15 percent	1,459	7.0%	2,123	9.4%
15 to 19 percent	2,139	10.2%	2,331	10.3%
20 to 24 percent	2,356	11.3%	2,170	9.6%
25 to 29 percent	2,139	10.2%	2,378	10.5%
30 to 34 percent	2,253	10.8%	1,897	8.4%
35 percent or more	10,575	50.5%	11,656	51.7%
Not computed	998	4.8%	1,185	5.3%

Source: 2006-2010 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30% or more of its monthly income on housing costs. In 2010, 61.3% (12,828 units) of renter-occupied units were cost burdened and 60.1% (13,533 units) of renter-occupied households in 2017 were cost burdened.

In 2010, 34.0% (7,418 units) of owner-occupied households were cost burdened whereas 61.3% (12,828 units) of renter-occupied households were cost burdened.

In 2017, 31.1% (5,655 units) of owner-occupied households were cost burdened whereas 60.1% (13,533 units) of renter-occupied households were cost burdened.

### Owner Costs – Bethlehem

The median monthly housing cost for owner-occupied households was \$1,010 in 2010 and \$1,141 in 2017. The median monthly housing cost for owner-occupied households increased by 13.0% (\$131) from 2010 to 2017.

The following table illustrates mortgage status and selected monthly owner costs in 2010 and 2017.

#### Monthly Owner Costs in the City of Bethlehem

Monthly Owner Cost	2006-2010 ACS	2013-2017 ACS
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	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	16,380	55.4%	14,955	51.7%
Less than \$300	590	3.6%	568	3.8%
\$300 to \$499	2,244	13.7%	1,452	9.7%
\$500 to \$799	3,391	20.7%	2,872	19.2%
\$800 to \$999	1,884	11.5%	1,496	10.0%
\$1,000 to \$1,499	4,275	26.1%	4,075	27.2%
\$1,500 to \$1,999	2,342	14.3%	2,815	18.8%
\$2,000 or more	1,654	10.1%	1,677	11.3%
No Cash Rent	-	-	-	-
Median (dollars)	\$1,010	-	\$1,141	-

Source: 2006-2010 and 2013-2017 American Community Survey

The following table illustrates housing costs for owner-households in 2010 and 2017 according to the 2006-2010 ACS and the 2013-2017 ACS.

**Monthly Owner Costs as a Percentage of Household Income  
in the City of Bethlehem**

Owner Costs as a % of Income	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	16,380	55.4%	14,955	51.7%
<b>Less than \$20,000</b>	<b>1,720</b>	<b>10.5%</b>	<b>1,190</b>	<b>8.0%</b>
Less than 20 percent	66	0.4%	40	0.3%
20 to 29 percent	147	0.9%	96	0.6%

30 percent or more	1,523	9.3%	1,054	7.0%
<b>\$20,000 to \$34,999</b>	<b>2,260</b>	<b>13.8%</b>	<b>1,665</b>	<b>11.1%</b>
Less than 20 percent	475	2.9%	352	2.4%
20 to 29 percent	622	3.8%	315	2.1%
30 percent or more	1,179	7.2%	998	6.7%
<b>\$35,000 to \$49,999</b>	<b>2,441</b>	<b>14.9%</b>	<b>1,855</b>	<b>12.4%</b>
Less than 20 percent	983	6.0%	691	4.6%
20 to 29 percent	524	3.2%	411	2.7%
30 percent or more	917	5.6%	753	5.0%
<b>\$50,000 to \$74,999</b>	<b>3,817</b>	<b>23.3%</b>	<b>3,219</b>	<b>21.5%</b>
Less than 20 percent	1,458	8.9%	1,532	10.2%
20 to 29 percent	1,458	8.9%	1,138	7.6%
30 percent or more	917	5.6%	549	3.7%
<b>\$75,000 or more</b>	<b>6,061</b>	<b>37.0%</b>	<b>7,000</b>	<b>46.8%</b>
Less than 20 percent	4,177	25.5%	5,325	35.6%
20 to 29 percent	1,556	9.5%	1,385	9.3%
30 percent or more	344	2.1%	290	1.9%
Zero or negative income	82	0.5%	26	0.2%
No cash rent	-	-	-	-

Source: 2006-2010 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30% or more of its monthly income on housing costs. In 2010, 29.8% (4,881 units) of owner-occupied units were cost burdened and 24.4% (3,644 units) of owner-occupied households in 2017 were cost burdened.

### Renter Costs – Bethlehem

The median monthly housing cost for renter-occupied households was \$821 in 2010; and \$993 in 2017. The median monthly housing cost for renter-occupied households increased by 21.0% (\$172) from 2010 to 2017.

The following table illustrates mortgage status and selected monthly renter costs in 2010 and 2017.

**Selected Monthly Renter Costs in the City of Bethlehem**

Monthly Renter Cost	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	13,204	44.6%	13,981	48.3%
Less than \$300	1,294	9.8%	1,179	8.4%
\$300 to \$499	1,162	8.8%	1,255	9.0%
\$500 to \$799	3,618	27.4%	1,854	13.3%
\$800 to \$999	3,037	23.0%	2,693	19.3%
\$1,000 to \$1,499	2,892	21.9%	5,022	35.9%
\$1,500 to \$1,999	555	4.2%	1,524	10.9%
\$2,000 or more	211	1.6%	232	1.7%
No Cash Rent	436	3.3%	222	1.6%
Median (dollars)	\$821	-	993	-

Source: 2006-2010 and 2013-2017 American Community Survey

The following table illustrates housing costs for owner-households in 2010 and 2017 according to the 2006-2010 ACS and the 2013-2017 ACS.

**Selected Monthly Renter Costs as a Percentage of Household Income  
in the City of Bethlehem**

Renter Costs as a % of Income	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	13,204	44.6%	13,981	48.3%
<b>Less than \$20,000</b>	<b>4,344</b>	<b>32.9%</b>	<b>3,875</b>	<b>27.7%</b>
Less than 20 percent	290	2.2%	60	0.4%
20 to 29 percent	607	4.6%	795	5.7%
30 percent or more	3,459	26.2%	3,020	21.6%
<b>\$20,000 to \$34,999</b>	<b>3,063</b>	<b>23.2%</b>	<b>2,980</b>	<b>21.3%</b>
Less than 20 percent	211	1.6%	159	1.1%
20 to 29 percent	634	4.8%	340	2.4%
30 percent or more	2,218	16.8%	2,481	17.7%
<b>\$35,000 to \$49,999</b>	<b>1,994</b>	<b>15.1%</b>	<b>2,009</b>	<b>14.4%</b>
Less than 20 percent	290	2.2%	250	1.8%
20 to 29 percent	990	7.5%	706	5.0%
30 percent or more	713	5.4%	1,053	7.5%
<b>\$50,000 to \$74,999</b>	<b>2,007</b>	<b>15.2%</b>	<b>2,180</b>	<b>15.6%</b>
Less than 20 percent	898	6.8%	764	5.5%
20 to 29 percent	924	7.0%	991	7.1%
30 percent or more	185	1.4%	425	3.0%
<b>\$75,000 or more</b>	<b>1,228</b>	<b>9.3%</b>	<b>2,465</b>	<b>17.6%</b>

Less than 20 percent	990	7.5%	1,955	14.0%
20 to 29 percent	211	1.6%	500	3.6%
30 percent or more	26	0.2%	10	0.1%
Zero or negative income	145	1.1%	250	1.8%
No cash rent	423	3.2%	222	1.6%

Source: 2006-2010 and 2013-2017 American Community Survey

### Gross Rent as a Percentage of Household Income in the City of Bethlehem

Rental Cost as a % of Income	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Rental Units paying rent	12,632	95.7%	13,509	96.6%
Less than 15 percent	1,153	9.1%	1,707	12.6%
15 to 19 percent	1,524	12.5%	1,481	11.0%
20 to 24 percent	1,455	11.5%	1,439	10.7%
25 to 29 percent	1,905	15.1%	1,893	14.0%
30 to 34 percent	1,307	10.3%	1,410	10.4%
35 percent or more	5,288	41.9%	5,579	41.3%
Not computed	572	4.3%	472	3.4%

Source: 2006-2010 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30% or more of its monthly income on housing costs. In 2010, 52.2% (6,595 units) of renter-occupied units were cost burdened and 51.7% (6,989 units) of renter-occupied households in 2017 were cost burdened.

In 2010, 29.8% (4,881 units) of owner-occupied households were cost burdened whereas 52.5% (6,595 units) of renter-occupied households were cost burdened.

In 2017, 24.4% (3,644 units) of owner-occupied households were cost burdened whereas 51.7% (6,989 units) of renter-occupied households were cost burdened.

### Owner Costs – Easton

The median monthly housing cost for owner-occupied households was \$1,104 in 2010 and \$1,136 in 2017. The median monthly housing cost for owner-occupied households increased by 2.9% (\$32) from 2010 to 2017.

The following table illustrates mortgage status and selected monthly owner costs in 2010 and 2017.

**Monthly Owner Costs in the City of Easton**

Monthly Owner Cost	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	4,675	50.7%	4,326	45.4%
Less than \$300	89	1.9%	58	1.3%
\$300 to \$499	603	12.9%	388	9.0%
\$500 to \$799	669	14.3%	818	18.9%
\$800 to \$999	655	14.0%	456	10.5%
\$1,000 to \$1,499	1,300	27.8%	1,328	30.7%
\$1,500 to \$1,999	837	17.9%	743	17.2%
\$2,000 or more	524	11.2%	535	12.4%
No Cash Rent	-	-	-	-
Median (dollars)	\$1,104	-	\$1,136	-

Source: 2006-2010 and 2013-2017 American Community Survey



The following table illustrates housing costs for owner-households in 2010 and 2017 according to the 2006-2010 ACS and the 2013-2017 ACS.

**Monthly Owner Costs as a Percentage of Household Income  
in the City of Easton**

Owner Costs as a % of Income	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	4,675	50.7%	4,326	45.4%
<b>Less than \$20,000</b>	<b>594</b>	<b>12.7%</b>	<b>410</b>	<b>9.5%</b>
Less than 20 percent	0	0.0%	13	0.3%
20 to 29 percent	94	2.0%	15	0.3%
30 percent or more	500	10.7%	382	8.8%
<b>\$20,000 to \$34,999</b>	<b>809</b>	<b>17.3%</b>	<b>501</b>	<b>11.6%</b>
Less than 20 percent	94	2.0%	102	2.4%
20 to 29 percent	168	3.6%	128	3.0%
30 percent or more	542	11.6%	271	6.3%
<b>\$35,000 to \$49,999</b>	<b>631</b>	<b>13.5%</b>	<b>584</b>	<b>13.5%</b>
Less than 20 percent	201	4.3%	109	2.5%
20 to 29 percent	126	2.7%	160	3.7%
30 percent or more	309	6.6%	315	7.3%
<b>\$50,000 to \$74,999</b>	<b>1,099</b>	<b>23.5%</b>	<b>939</b>	<b>21.7%</b>
Less than 20 percent	351	7.5%	456	10.5%
20 to 29 percent	341	7.3%	344	8.0%
30 percent or more	402	8.6%	139	3.2%
<b>\$75,000 or more</b>	<b>1,515</b>	<b>32.4%</b>	<b>1,876</b>	<b>43.4%</b>

Less than 20 percent	1,029	22.0%	1,488	34.4%
20 to 29 percent	393	8.4%	329	7.6%
30 percent or more	94	2.0%	59	1.4%
Zero or negative income	28	0.6%	16	0.4%
No cash rent	-	-	-	-

Source: 2006-2010 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30% or more of its monthly income on housing costs. In 2010, 39.5% (1,847 units) of owner-occupied units were cost burdened and 27.0% (1,166 units) of owner-occupied households in 2017 were cost burdened.

### Renter Costs – Easton

The median monthly housing cost for renter-occupied households was \$795 in 2010; and \$938 in 2017. The median monthly housing cost for renter-occupied households increased by 21.0% (\$143) from 2010 to 2017.

The following table illustrates mortgage status and selected monthly renter costs in 2010 and 2017.

### Selected Monthly Renter Costs in the City of Easton

Monthly Renter Cost	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	4,547	49.3%	5,195	54.6%
Less than \$300	437	9.6%	285	5.5%
\$300 to \$499	327	7.2%	302	5.8%
\$500 to \$799	1,478	32.5%	917	17.7%
\$800 to \$999	1,069	23.5%	1,483	28.5%
\$1,000 to \$1,499	964	21.2%	1,730	33.3%

\$1,500 to \$1,999	118	2.6%	301	5.8%
\$2,000 or more	9	0.2%	16	0.3%
No Cash Rent	146	3.2%	161	3.1%
Median (dollars)	\$795	-	\$938	-

Source: 2006-2010 and 2013-2017 American Community Survey

The following table illustrates housing costs for owner-households in 2010 and 2017 according to the 2006-2010 ACS and the 2013-2017 ACS.

**Selected Monthly Renter Costs as a Percentage of Household Income in the City of Easton**

Renter Costs as a % of Income	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	4,547	49.3%	5,195	54.6%
<b>Less than \$20,000</b>	<b>1,555</b>	<b>34.2%</b>	<b>1,634</b>	<b>31.5%</b>
Less than 20 percent	136	3.0%	18	0.3%
20 to 29 percent	246	5.4%	207	4.0%
30 percent or more	1,173	25.8%	1,409	27.1%
<b>\$20,000 to \$34,999</b>	<b>982</b>	<b>21.6%</b>	<b>1,187</b>	<b>22.8%</b>
Less than 20 percent	14	0.3%	21	0.4%
20 to 29 percent	332	7.3%	189	3.6%
30 percent or more	637	14.0%	977	18.8%
<b>\$35,000 to \$49,999</b>	<b>923</b>	<b>20.3%</b>	<b>564</b>	<b>10.9%</b>
Less than 20 percent	109	2.4%	97	1.9%
20 to 29 percent	582	12.8%	298	5.7%

30 percent or more	232	5.1%	169	3.3%
<b>\$50,000 to \$74,999</b>	<b>614</b>	<b>13.5%</b>	<b>871</b>	<b>16.8%</b>
Less than 20 percent	359	7.9%	356	6.9%
20 to 29 percent	250	5.5%	425	8.2%
30 percent or more	0	0.0%	90	1.7%
<b>\$75,000 or more</b>	<b>282</b>	<b>6.2%</b>	<b>769</b>	<b>14.8%</b>
Less than 20 percent	223	4.9%	660	12.7%
20 to 29 percent	59	1.3%	100	1.9%
30 percent or more	0	0.0%	9	0.2%
Zero or negative income	45	1.0%	9	0.2%
No cash rent	146	3.2%	161	3.1%

Source: 2006-2010 and 2013-2017 American Community Survey

### Gross Rent as a Percentage of Household Income in the City of Easton

Rental Cost as a % of Income	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Rental Units paying rent	4,355	95.8%	5,025	96.7%
Less than 15 percent	376	8.6%	579	11.5%
15 to 19 percent	466	10.7%	573	11.4%
20 to 24 percent	618	14.2%	586	11.7%
25 to 29 percent	849	19.5%	633	12.6%
30 to 34 percent	363	8.3%	443	8.8%

35 percent or more	1,683	38.6%	2,211	44.0%
Not computed	192	4.2%	170	3.3%

Source: 2006-2010 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30% or more of its monthly income on housing costs. In 2010, 46.9% (2,046 units) of renter-occupied units were cost burdened and 52.8% (2,654 units) of renter-occupied households in 2017 were cost burdened.

In 2010, 39.5% (1,847 units) of owner-occupied households were cost burdened whereas 46.9% (2,046 units) of renter-occupied households were cost burdened.

In 2017, 27.0% (1,166 units) of owner-occupied households were cost burdened whereas 52.8% (2,654 units) of renter-occupied households were cost burdened.

### Owner Costs – Northampton County

The median monthly housing cost for owner-occupied households was \$1,248 in 2010 and \$1,291 in 2017. The median monthly housing cost for owner-occupied households increased by 3.4% (\$43) from 2010 to 2017.

The following table illustrates mortgage status and selected monthly owner costs in 2010 and 2017.

#### Monthly Owner Costs in Northampton County

Monthly Owner Cost	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	84,441	75.4%	81,540	71.6%
Less than \$300	2,111	2.5%	1,484	1.8%
\$300 to \$499	8,866	10.5%	5,574	6.8%
\$500 to \$799	15,030	17.8%	15,380	18.9%

\$800 to \$999	7,262	8.6%	7,528	9.2%
\$1,000 to \$1,499	17,986	21.3%	18,800	23.1%
\$1,500 to \$1,999	14,693	17.4%	14,860	18.2%
\$2,000 or more	18,493	21.9%	17,914	22.0%
No Cash Rent	-	-	-	-
Median (dollars)	\$1,248	-	\$1,291	-

Source: 2006-2010 and 2013-2017 American Community Survey

The following table illustrates housing costs for owner-households in 2010 and 2017 according to the 2006-2010 ACS and the 2013-2017 ACS.

### Monthly Owner Costs as a Percentage of Household Income in Northampton County

Owner Costs as a % of Income	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	84,441	75.4%	81,540	71.6%
<b>Less than \$20,000</b>	<b>6,418</b>	<b>7.6%</b>	<b>5,124</b>	<b>6.3%</b>
Less than 20 percent	169	0.2%	98	0.1%
20 to 29 percent	760	0.9%	383	0.5%
30 percent or more	5,404	6.4%	4,643	5.7%
<b>\$20,000 to \$34,999</b>	<b>10,217</b>	<b>12.1%</b>	<b>7,850</b>	<b>9.6%</b>
Less than 20 percent	2,027	2.4%	1,200	1.5%
20 to 29 percent	2,787	3.3%	2,106	2.6%
30 percent or more	5,404	6.4%	4,544	5.6%
<b>\$35,000 to \$49,999</b>	<b>10,808</b>	<b>12.8%</b>	<b>9,182</b>	<b>11.3%</b>

Less than 20 percent	4,138	4.9%	2,592	3.2%
20 to 29 percent	2,111	2.5%	2,353	2.9%
30 percent or more	4,560	5.4%	4,237	5.2%
<b>\$50,000 to \$74,999</b>	<b>18,070</b>	<b>21.4%</b>	<b>15,651</b>	<b>19.2%</b>
Less than 20 percent	6,840	8.1%	6,459	7.9%
20 to 29 percent	5,404	6.4%	4,765	5.8%
30 percent or more	5,911	7.0%	4,427	5.4%
<b>\$75,000 or more</b>	<b>38,674</b>	<b>45.8%</b>	<b>43,305</b>	<b>53.1%</b>
Less than 20 percent	22,968	27.2%	29,616	36.3%
20 to 29 percent	11,400	13.5%	10,484	12.9%
30 percent or more	4,306	5.1%	3,205	3.9%
Zero or negative income	253	0.3%	428	0.5%
No cash rent	-	-	-	-

Source: 2006-2010 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30% or more of its monthly income on housing costs. In 2010, 30.3% (25,586 units) of owner-occupied units were cost burdened and 25.8% (21,056 units) of owner-occupied households in 2017 were cost burdened.

### Renter Costs – Northampton County

The median monthly housing cost for renter-occupied households was \$829 in 2010; and \$997 in 2017. The median monthly housing cost for renter-occupied households increased by 21.0% (\$168) from 2010 to 2017.

The following table illustrates mortgage status and selected monthly renter costs in 2010 and 2017.



**Selected Monthly Renter Costs in Northampton County**

Monthly Renter Cost	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	27,488	24.6%	32,287	28.4%
Less than \$300	2,034	7.4%	1,669	5.2%
\$300 to \$499	1,814	6.6%	1,988	6.2%
\$500 to \$799	8,219	29.9%	5,085	15.7%
\$800 to \$999	5,855	21.3%	6,830	21.2%
\$1,000 to \$1,499	6,460	23.5%	11,034	34.2%
\$1,500 to \$1,999	1,154	4.2%	3,351	10.4%
\$2,000 or more	385	1.4%	1,003	3.1%
No Cash Rent	1,567	5.7%	1,327	4.1%
Median (dollars)	\$829	-	\$977	-

Source: 2006-2010 and 2013-2017 American Community Survey

The following table illustrates housing costs for owner-households in 2010 and 2017 according to the 2006-2010 ACS and the 2013-2017 ACS.

**Selected Monthly Renter Costs as a Percentage of Household Income in Northampton County**

Renter Costs as a % of Income	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	27,488	24.6%	32,287	28.4%
Less than \$20,000	8,054	29.3%	7,937	24.6%

Less than 20 percent	550	2.0%	170	0.5%
20 to 29 percent	990	3.6%	1,195	3.7%
30 percent or more	6,515	23.7%	6,572	20.4%
<b>\$20,000 to \$34,999</b>	<b>5,855</b>	<b>21.3%</b>	<b>6,660</b>	<b>20.6%</b>
Less than 20 percent	330	1.2%	181	0.6%
20 to 29 percent	1,457	5.3%	1,021	3.2%
30 percent or more	4,041	14.7%	5,458	16.9%
<b>\$35,000 to \$49,999</b>	<b>4,536</b>	<b>16.5%</b>	<b>5,056</b>	<b>15.7%</b>
Less than 20 percent	852	3.1%	530	1.6%
20 to 29 percent	2,282	8.3%	1,832	5.7%
30 percent or more	1,374	5.0%	2,694	8.3%
<b>\$50,000 to \$74,999</b>	<b>4,398</b>	<b>16.0%</b>	<b>5,285</b>	<b>16.4%</b>
Less than 20 percent	2,227	8.1%	1,876	5.8%
20 to 29 percent	1,814	6.6%	2,294	7.1%
30 percent or more	385	1.4%	1,115	3.5%
<b>\$75,000 or more</b>	<b>2,831</b>	<b>10.3%</b>	<b>5,657</b>	<b>17.5%</b>
Less than 20 percent	2,282	8.3%	4,568	14.1%
20 to 29 percent	495	1.8%	982	3.0%
30 percent or more	27	0.1%	107	0.3%
Zero or negative income	275	1.0%	365	1.1%
No cash rent	1,539	5.6%	1,327	4.1%

Source: 2006-2010 and 2013-2017 American Community Survey

The following table illustrates the housing costs for renter-households according to the 2006-2010 and 2013-2017 American Community Survey.

### Gross Rent as a Percentage of Household Income in Northampton County

Rental Cost as a % of Income	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Rental Units paying rent	25,672	93.4%	30,595	94.8%
Less than 15 percent	2,664	10.4%	3,786	12.4%
15 to 19 percent	3,598	14.0%	3,539	11.6%
20 to 24 percent	3,235	12.6%	3,671	12.0%
25 to 29 percent	3,832	14.9%	3,653	11.9%
30 to 34 percent	2,274	8.9%	3,105	10.1%
35 percent or more	10,069	39.2%	12,841	42.0%
Not computed	1,816	6.6%	1,692	5.2%

Source: 2006-2010 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30% or more of its monthly income on housing costs. In 2010, 45.0% (12,343 units) of renter-occupied units were cost burdened and 49.4% (15,946 units) of renter-occupied households in 2017 were cost burdened.

In 2010, 30.3% (25,586 units) of owner-occupied households were cost burdened whereas 45.0% (12,343 units) of renter-occupied households were cost burdened.

In 2017, 25.8% (21,056 units) of owner-occupied households were cost burdened whereas 49.4% (15,946 units) of renter-occupied households were cost burdened.

The 2017 HUD Fair Market Rents and HOME Rent Limits for the Allentown, Bethlehem, Easton, PA HUD Metro FM Area are shown in the table below.

**FY 2017 Fair Market Rents (FMR) and HOME Rent Limits for the Allentown, Bethlehem, Easton, PA HUD Metro FM Area**

Rent	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Fair Market Rent	\$659	\$815	\$1,038	\$1,332	\$1,431
High HOME Rent	\$659	\$815	\$1,038	\$1,219	\$1,340
Low HOME Rent	\$642	\$688	\$826	\$954	\$1,065

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

Fair Market Rents (FMRs) are primarily used to determine payment standard amounts for HUD assisted housing. The High HOME Rent Limit for an area is the lesser of the Section 8 Fair Market Rent (FMR) for the area or a rent equal to 30% of the annual income of a family whose income equals 65% of the area median income, as determined by HUD. The Low HOME Rent Limit for an area is 30% of the annual income of a family whose income equals 50% of the area median income, as determined by HUD, capped by the High HOME Rent Limit. HUD's Economic and Market Analysis Division calculates the HOME rents each year using the FMRs and the Section 8 Income Limits.

The area median rent is estimated to be \$997 according to the 2013-2017 ACS data, which is approximately the cost of a two-bedroom rental and within market expectations. The average rents posted commercially exceed the area median rent and fair market rents but only by a small factor. The rental market in Northampton County is competitive and assisted rental housing units do not disproportionately impact the market forces dictating rents in the County.

### **Foreclosures – Allentown**

According to RealtyTrac ([www.realtytrac.com](http://www.realtytrac.com)) as of December 2019, the City of Allentown had 97 properties in some stage of foreclosure and a foreclosure rate of 1 in every 3,396 housing units. During calendar year 2019, foreclosures averaged 17 with a high of 28 foreclosures in January 2019 and a low of 9 foreclosures in October 2019.

### **Foreclosures – Bethlehem**

According to RealtyTrac ([www.realtytrac.com](http://www.realtytrac.com)) as of December 2019, the City of Bethlehem had 65 properties in some stage of foreclosure and a foreclosure rate of 1 in every 2,659 housing units. During calendar year 2019, foreclosures averaged 13 with a high of 19 foreclosures in December 2019 and a low of 6 foreclosures in November 2019.

### **Foreclosures – Easton**

According to RealtyTrac ([www.realtytrac.com](http://www.realtytrac.com)) as of December 2019, the City of Easton had 56 properties in some stage of foreclosure and a foreclosure rate of 1 in every 2,326 housing units. During calendar year 2019, foreclosures averaged 12 with a high of 18 foreclosures in February 2019 and a low of 7 foreclosures in March 2019.

### **Foreclosures – Northampton County**

According to RealtyTrac ([www.realtytrac.com](http://www.realtytrac.com)) as of December 2019, Northampton County had 109 properties in some stage of foreclosure and a foreclosure rate of 1 in every 2,201 housing units. During calendar year 2019, foreclosures averaged 42 with a high of 60 foreclosures in December 2019 and a low of 30 foreclosures in June 2019.

## **G. Household Housing Problems:**

### **Summary of Housing Needs – City of Allentown**

From 1970 to 2000, Allentown's population shrank by 2,889 persons, or 2.6%. By comparison, Lehigh County grew by 22.2% and the Commonwealth of Pennsylvania grew by 4.1% over the same time 30-year time period. From 2000 to 2017 Allentown's population has grown by 13,496 persons or 12.6%. During the same period, Lehigh County grew at a slightly higher rate than the City at 15.6%, and both city and county grew at rates higher than Pennsylvania, which grew by 4.1%.

According to City records, Allentown has a total of 47,210 housing units with 57.1% being single family structures and 42.8% being multi-family structures. The 2013-2017 American Survey indicates that 8.4% of housing units were vacant. The ACS goes on to estimated 10.9% of the housing units were built since 1990.

Of the 45,384 occupied housing units, 18,195 (40.1%) are owner occupied and 27,189 (59.9%) are renter occupied. An estimated 79.2% of householders of these units had moved in since 2000. An estimated 65.5% of the owner-occupied units had a mortgage.

According to the 2013-2017 American Community Survey 5-Year Estimates, the median monthly housing costs for mortgaged owners was \$1,257, non-mortgaged owners \$534, and renters \$938. An estimated 35.7% of owners with mortgages, 22.6% of owners without mortgages, and 60.1% of renters in

Allentown, Pennsylvania spent 30 percent or more of their household income on housing.

**Housing Problems (Households with one of the listed needs)**

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	125	40	4	0	169	30	0	45	0	75
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	65	25	45	15	150	10	25	30	0	65
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	500	225	60	140	925	80	10	35	45	170
Housing cost burden greater than 50% of income (and none of the above problems)	5,035	1,370	105	4	6,514	940	795	385	120	2,240
Housing cost burden greater than 30% of income (and none of the above problems)	795	2,875	1,440	265	5,375	280	835	1,465	390	2,970
Zero/negative Income (and none of the above problems)	520	0	0	0	520	50	0	0	0	50

Source: 2011-2015 CHAS

## Housing Problems (Households with one or more Severe Housing Problems:

Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	5,725	1,660	215	160	7,760	1,060	825	490	165	2,540
Having none of four housing problems	1,710	3,570	3,725	1,805	10,810	405	1,700	3,740	2,210	8,055
Household has negative income, but none of the other housing problems	520	0	0	0	520	50	0	0	0	50

Source: 2011-2015 CHAS

## Cost Burden Greater Than 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	2,660	2,215	549	5,424	455	665	965	2,085
Large Related	845	795	130	1,770	150	165	225	540
Elderly	1,040	595	215	1,850	535	545	370	1,450
Other	1,875	890	660	3,425	180	290	320	790
Total need by income	6,420	4,495	1,554	12,469	1,320	1,665	1,880	4,865

Source: 2011-2015 CHAS

## Cost Burden Greater Than 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	2,495	630	4	3,129	400	370	165	935

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Large Related	810	135	0	945	135	55	30	220
Elderly	725	245	75	1,045	350	180	145	675
Other	1,570	365	25	1,960	155	195	45	395
Total need by income	5,600	1,375	104	7,079	1,040	800	385	2,225

Source: 2011-2015 CHAS

### 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
Single family households	455	185	85	95	820	19	35	19	45	118
Multiple, unrelated family households	94	50	20	45	209	65	0	35	0	100
Other, non-family households	15	10	0	15	40	4	0	0	0	4
Total need by income	564	245	105	155	1,069	88	35	54	45	222

Source: 2011-2015 CHAS

The most common housing problems in the City of Allentown are: a lack of affordable housing options and long waiting lists for income-restricted units; a high rate of households spending more than 30% of their gross household income on housing expenses; landlord discrimination, including discrimination against households with children and tenant-based housing voucher holders; and a lack of ADA accessible rental housing.

Additional housing problems that were recorded in consultations and citizen comments included handicap accessible housing, availability of senior housing, availability of group homes or communal living arrangement housing, housing density issues, and code compliance for housing. Lower income households and renter households are more likely to be affected by these housing problems.

### Summary of Housing Needs – City of Bethlehem



There was a 0% increase in the population of the City of Bethlehem between the 2000 Census and 2011-2015 American Community Survey. Households grew by 3% and household income increased by 5%.

The following Comprehensive Housing Affordability Strategy (CHAS) data provides information concerning housing costs and quality. The most recent data set is 2011-2015 CHAS. The data set includes the City of Easton.

### Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	100	15	55	0	170	20	0	25	0	45
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	35	20	59	25	139	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	50	65	35	25	175	0	20	10	4	34
Housing cost burden greater than 50% of income (and none of the above problems)	2,335	840	130	0	3,305	710	410	230	50	1,400
Housing cost burden greater than 30% of income (and none of the above problems)	605	980	1,565	325	3,475	155	510	710	450	1,825
Zero/negative Income (and none of the above problems)	130	0	0	0	130	60	0	0	0	60

Source: 2011-2015 CHAS

### Housing Problems (Households with one or more Severe Housing Problems:

**Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)**

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	2,520	945	285	50	3,800	730	430	265	55	1,480
Having none of four housing problems	1,290	1,625	2,790	1,290	6,995	185	950	2,130	1,605	4,870
Household has negative income, but none of the other housing problems	130	0	0	0	130	60	0	0	0	60

Source: 2011-2015 CHAS

**Cost Burden Greater Than 30%**

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	1,225	745	700	2,670	195	220	315	730
Large Related	129	185	129	443	70	18	115	203
Elderly	604	429	374	1,407	359	600	290	1,249
Other	1,095	545	585	2,225	250	84	230	564
Total need by income	3,053	1,904	1,788	6,745	874	922	950	2,746

Source: 2011-2015 CHAS

**Cost Burden Greater Than 50%**

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	1,0025	345	40	1,410	160	115	75	350
Large Related	125	105	4	234	70	8	25	103
Elderly	390	240	34	664	224	250	95	569

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Other	920	215	50	1,185	250	35	40	325
Total need by income	2,460	905	128	3,493	704	408	235	1,347

Source: 2011-2015 CHAS

### 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
Single family households	85	75	64	50	274	0	20	10	4	34
Multiple, unrelated family households	0	10	4	0	14	0	0	0	0	0
Other, non-family households	0	0	25	0	25	0	0	0	0	0
Total need by income	85	85	93	50	313	0	20	10	4	34

Source: 2011-2015 CHAS

The cost of housing in Bethlehem is the most common housing problem; 4,840 households pay more than 50% of household income on housing in Bethlehem and a total of 9,491 households pay more than 30% of their income for housing costs. Cost burdens are especially affecting elderly households, 0-30% AMI households, and renter households.

### Summary of Housing Needs – Northampton County

There was a 12.2% increase in the population of Northampton County between the 2000 Census and 2011-2015 American Community Survey. Households grew by 11.2% and household income significantly increased by 34.8%. According to the Bureau of Labor Statistics Consumer Price Index (CPI), prices in 2017 are 12.26% higher than average prices as compared to prices in 2010. The dollar experienced an average annual inflation rate of 1.67% during this period. This relationship equated to a decrease in housing unit supply and an increase in housing demand. Unfortunately, even with the increase in median household incomes, housing became more expensive in terms of real dollars for the average household in the County.

The following Comprehensive Housing Affordability Strategy (CHAS) data provides information concerning housing costs and quality. The most recent data set is 2011-2015 CHAS. The data set includes the City of Easton.

**Housing Problems (Households with one of the listed needs)**

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	200	310	249	159	918	10	54	10	10	84
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	44	8	20	0	72	0	0	10	0	10
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	10	60	89	0	159	0	10	35	49	94
Housing cost burden greater than 50% of income (and none of the above problems)	1,624	1,029	271	10	2,934	2,297	1,674	1,534	447	5,952
Housing cost burden greater than 30% of income (and none of the above problems)	293	1,232	1,564	382	3,471	357	1,660	2,766	2,324	7,107
Zero/negative Income (and none of the above problems)	175	0	0	0	175	300	0	0	0	300

Source: 2011-2015 CHAS

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	1,889	1,415	627	169	4,100	2,307	1,734	1,584	507	6,132
Having none of four housing problems	591	2,162	3,304	1,752	7,809	562	3,081	7,765	6,409	17,817
Household has negative income, but none of the other housing problems	175	0	0	0	175	300	0	0	0	300

Source: 2011-2015 CHAS

**Cost Burden Greater Than 30%**

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	755	879	815	2,449	410	846	1,693	2,949
Large Related	28	142	147	317	98	84	346	528
Elderly	694	973	640	2,307	1,698	1,978	1,519	5,195
Other	654	612	464	1,730	470	481	756	1,707
Total need by income	2,131	2,606	2,066	6,803	2,676	3,389	4,314	10,379

Source: 2011-2015 CHAS

**Cost Burden Greater Than 50%**

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	708	294	118	1,120	361	540	586	1,487

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Large Related	28	18	10	56	75	39	84	198
Elderly	527	598	207	1,332	1,464	751	577	2,792
Other	581	212	45	838	416	365	311	1,092
Total need by income	1,844	1,122	380	3,346	2,316	1,695	1,558	5,569

Source: 2011-2015 CHAS

### 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
Single family households	54	53	99	0	206	0	10	45	4	59
Multiple, unrelated family households	0	15	0	0	15	0	0	0	45	45
Other, non-family households	0	0	10	0	10	0	0	0	0	0
Total need by income	54	68	109	0	231	0	10	45	49	104

Source: 2011-2015 CHAS

The largest housing problem in the Northampton County is housing affordability. According to the 2013-2017 ACS, 60.3% of all renter households are cost burdened by 30% or more and 31.1% of owner households with a mortgage are cost burdened by 30% or more. Cost burdens are especially affecting 0-30% AMI households.

Additional housing problems that were recorded in consultations and citizen comments included handicap accessible housing, availability of senior housing, availability of group homes or communal living arrangement housing, housing density issues, and code compliance for housing. Lower income households and renter households are more likely to be affected by these housing problems.

## H. Racial and Ethnic Housing Problems:

### City of Allentown

Housing needs disaggregated by racial and ethnic groups were analyzed to determine if a group disproportionately experienced a housing need as compared to the City's overall housing needs. A disproportionately greater need was identified when a racial or ethnic group experienced a 10 percentage points or higher than the percentage of persons in the jurisdiction as a whole. A housing problem is defined as one of the four following housing problems: 1. housing lacks complete kitchen facilities; 2. housing lacks complete plumbing facilities; 3. housing has more than 1 person per room; and 4. housing cost burden is over 30%. The following tables evaluating the 2011-2015 CHAS and ACS data highlight disproportionate needs in the City of Allentown.

#### 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	7,860	1,040	570
White	2,275	510	270
Black / African American	1,160	25	30
Asian	85	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	4,190	445	269

Source: 2011-2015 CHAS

**30%-50% of Area Median Income**

<b>Housing Problems</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	6,195	1,565	0
White	2,315	1,010	0
Black / African American	635	130	0
Asian	100	20	0
American Indian, Alaska Native	0	35	0
Pacific Islander	0	0	0
Hispanic	2,880	370	0

Source: 2011-2015 CHAS

**50%-80% of Area Median Income**

<b>Housing Problems</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	3,615	4,560	0
White	1,675	2,530	0
Black / African American	430	340	0
Asian	110	45	0
American Indian, Alaska Native	30	15	0
Pacific Islander	0	0	0
Hispanic	1,355	1,605	0

Source: 2011-2015 CHAS



**80%-100% of Area Median Income**

<b>Housing Problems</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	975	3,360	0
White	430	1,750	0
Black / African American	95	245	0
Asian	40	50	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	410	1,290	0

Source: 2011-2015 CHAS

The following disproportionately greater housing problems in Allentown were:

- 0%-30% of Area Median Income - The jurisdiction as a whole in this income category is experiencing one or more of the four (4) housing problems at a rate of eighty eight percent (88%). The only group of individuals experiencing one or more housing problems at a disproportionately higher rate is Black/African American at a rate of 98%.
- 30%-50% of Area Median Income - The jurisdiction as a whole in this income category is experiencing one or more of the four (4) housing problems at a rate of seventy nine percent (79%). No group of individuals experiencing one or more housing problems at a disproportionately higher rate.
- 50%-80% of Area Median Income - The jurisdiction as a whole in this income category is experiencing one or more of the four (4) housing problems at a rate of forty four percent (44%). Several races categories are experiencing one or more housing problems at a disproportionately higher rate. Specifically, Black/African American (55%), Asian (71%), American Indian, and Alaska Native (66%).
- 80%-100% of Area Median Income - The jurisdiction as a whole in this income category is experiencing one or more of the four (4) housing problems at a rate of twenty two percent (22%). The only group of

individuals experiencing one or more housing problems at a disproportionately higher rate is Asian at a rate of 44%.

### City of Bethlehem

Housing needs disaggregated by racial and ethnic groups were analyzed to determine if a group disproportionately experienced a housing need as compared to the City's overall housing needs. A disproportionately greater need was identified when a racial or ethnic group experienced a 10 percentage points or higher than the percentage of persons in the jurisdiction as a whole. A housing problem is defined as one of the four following housing problems: 1. housing lacks complete kitchen facilities; 2. housing lacks complete plumbing facilities; 3. housing has more than 1 person per room; and 4. housing cost burden is over 30%. The following tables evaluating the 2011-2015 CHAS and ACS data highlight disproportionate needs in the City of Bethlehem.

#### 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	4,015	715	190
White	1,935	345	110
Black / African American	335	55	0
Asian	74	15	10
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	1,565	299	65

Source: 2011-2015 CHAS

**30%-50% of Area Median Income**

<b>Housing Problems</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	2,865	1,085	0
White	1,645	775	0
Black / African American	135	10	0
Asian	70	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	910	295	0

Source: 2011-2015 CHAS

**50%-80% of Area Median Income**

<b>Housing Problems</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	2,820	2,645	0
White	1,735	1,725	0
Black / African American	220	99	0
Asian	65	49	0
American Indian, Alaska Native	10	4	0
Pacific Islander	0	0	0
Hispanic	755	715	0

Source: 2011-2015 CHAS

**80%-100% of Area Median Income**

<b>Housing Problems</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	885	2,120	0
White	695	1,565	0
Black / African American	35	120	0
Asian	15	0	0
American Indian, Alaska Native	0	35	0
Pacific Islander	0	0	0
Hispanic	125	279	0

Source: 2011-2015 CHAS

The following disproportionately greater housing problems in Bethlehem were:

- Hispanic households have a disproportionately greater need in relation to housing problems compared to all other households earning between 0-30% of AMI. Approximately 39% of households earning between 0-30% of Area Median Income having one or more housing problems are Hispanic. Meanwhile among the general population, Hispanics make up approximately 28.5% of the population.
- White households have a disproportionately greater need in relation to housing problems compared to all other households earning between 80-100% of AMI. Approximately 78.5% of households earning between 80%-100% of Area Median Income that have one or more housing issues are White. Meanwhile among the general population, the White population makes up 60.1% of the population.
- White households have a disproportionately greater need in relation to severe housing problems compared to all other households earning between 80-100% of AMI. Approximately 78% of households earning between 50%-80% of Area Median Income that have one or more severe housing issue in Bethlehem are White. Meanwhile among the general population the White population makes up approximately 60.1% of population.

## Northampton County

Housing needs disaggregated by racial and ethnic groups were analyzed to determine if a group disproportionately experienced a housing need as compared to the County's overall housing needs. A disproportionately greater need was identified when a racial or ethnic group experienced a 10 percentage points or higher occurrence rate of housing problems. A housing problem is defined as one of the four following housing problems: 1. housing lacks complete kitchen facilities; 2. housing lacks complete plumbing facilities; 3. housing has more than 1 person per room; and 4. housing cost burden is over 30%. The following tables evaluating the 2011-2015 CHAS and ACS data highlight disproportionate needs in the Northampton County. The data set includes the City of Easton.

### 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	4,861	517	475
White	4,197	513	407
Black / African American	101	0	14
Asian	73	4	4
American Indian, Alaska Native	24	0	0
Pacific Islander	0	0	0
Hispanic	328	0	15

Source: 2011-2015 CHAS

**30%-50% of Area Median Income**

<b>Housing Problems</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	6,039	2,393	0
White	5,348	2,333	0
Black / African American	178	0	0
Asian	132	15	0
American Indian, Alaska Native	10	0	0
Pacific Islander	0	0	0
Hispanic	344	29	0

Source: 2011-2015 CHAS

**50%-80% of Area Median Income**

<b>Housing Problems</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	6,535	6,735	0
White	5,785	6,410	0
Black / African American	238	89	0
Asian	160	8	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	257	185	0

Source: 2011-2015 CHAS

**80%-100% of Area Median Income**

<b>Housing Problems</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	3,365	5,472	0
White	2,984	5,006	0
Black / African American	127	89	0
Asian	55	125	0
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	112	223	0

Source: 2011-2015 CHAS

The racial/ethnic household composition of the County according to the 2011-2015 ACS was 89.9% White, 4.1% Black/African American, 2.2% Asian, 0.2% American Indian Alaska Native, 0.0% Pacific Islander and 9.1% Hispanic. None (0) of the racial/ethnic groups were disproportionately affected by housing problems.

**I. Racial and Ethnic Housing Cost Burden:****City of Allentown**

Housing needs disaggregated by racial and ethnic groups were analyzed to determine if a group disproportionately experienced a housing need as compared to the City's overall housing needs. A disproportionately greater need was identified when a racial or ethnic group experienced a 10 percentage points or higher occurrence rate of housing cost burdens. A housing cost burden is defined as household paying over 30% of household AMI on housing costs. The following tables evaluating the 2011-2015 CHAS and ACS data highlight disproportionate needs in the City of Allentown. The data set includes

the City of Easton.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	21,595	9,540	9,485	620
White	12,760	4,070	3,160	285
Black / African American	1,840	940	1,1310	40
Asian	450	160	160	0
American Indian, Alaska Native	80	30	0	0
Pacific Islander	0	0	0	0
Hispanic	6,280	4,110	4,620	290

Source: 2011-2015 CHAS

The following disproportionately greater housing problems in Allentown were:

- Housing Cost to Income Ratio Less than 30% - Approximately fifty two percent (52%) of all households in City have a housing cost to income ratio of less than 30% and are otherwise not cost burdened. The only group with a disproportionately lower rate of non-cost burdened households in this category are Hispanics with 41%.
- Housing Cost to Income Ratio Between 30% and 50% - Approximately twenty three percent (23%) of all households in the City have a housing cost to income ratio of between 30% and 50% and are otherwise cost burdened. There are no racial or ethnic groups with a disproportionately higher rate of cost burdened households in this category.
- Housing Cost to Income Ratio Greater Than 50% - Approximately twenty three percent (23%) of all households in the City have a housing cost to income ratio of more than 50% and are otherwise severely cost burdened. There are no racial or ethnic groups with a disproportionately higher rate of cost burdened households in this category. It is worth noting the Black/African American population (32% extremely cost burdened) is just 1 percentage point from meeting the definition for a disproportionate difference.



## City of Bethlehem

Housing needs disaggregated by racial and ethnic groups were analyzed to determine if a group disproportionately experienced a housing need as compared to the City's overall housing needs. A disproportionately greater need was identified when a racial or ethnic group experienced a 10 percentage points or higher occurrence rate of housing cost burdens. A housing cost burden is defined as household paying over 30% of household AMI on housing costs. The following tables evaluating the 2011-2015 CHAS and ACS data highlight disproportionate needs in the City of Allentown.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	17,930	6,070	4,945	200
White	13,735	3,770	2,660	125
Black / African American	540	350	380	0
Asian	405	95	119	10
American Indian, Alaska Native	45	10	0	0
Pacific Islander	0	0	0	0
Hispanic	2,840	1,750	1,610	65

Source: 2011-2015 CHAS

As a City, 38% of the households in Bethlehem pay over 30% of their income toward housing costs. Of those that are not cost-burdened, 76.6% of them are White, of all white households, the majority (68.1%) of them are not cost burdened. The only other racial or ethnic group where the majority of households are not cost burdened are Asian (65.4% non-cost burdened) and American Indian and Alaska Native (81.8%). Both Hispanic (54.2%) and Black/African American (57.5%) have a majority of households in Bethlehem being cost burdened.

The racial breakdown of households that are cost-burdened, correlates to the total percentage population racial cohorts in Bethlehem. Of those cost burdened between 30-50% of their income: 62.1% are White; 5.8% are Black/African American; 1.6% are Asian; and 28.8% are Hispanic. Of those

cost-burdened by over 50% of their income: the percentage of White households decreases a bit but remains the majority at 53.8%; Black/African-American increases slightly to 7.7%; Asian increases slightly to 2.4%; and Hispanic increases to 32.6%.

Black and Hispanic households have more households cost-burdened than not cost-burdened in Bethlehem. With the overall Bethlehem percentage of cost burden being 38%, and the Hispanic Cost Burden being 54.2% and the Black /African American cost burdened rate being 57.5%. In terms of cost burden, Black/African American and Hispanic households are disproportionately affected.

### Northampton County

Housing needs disaggregated by racial and ethnic groups were analyzed to determine if a group disproportionately experienced a housing need as compared to the County's overall housing needs. A disproportionately greater need was identified when a racial or ethnic group experienced a 10 percentage points or higher occurrence rate of housing cost burdens. A housing cost burden is defined as household paying over 30% of household AMI on housing costs. The following tables evaluating the 2011-2015 CHAS and ACS data highlight disproportionate needs in Northampton County. The data set includes the City of Easton.

**Housing Cost Burden**

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	56,822	15,639	9,890	475
White	52,290	13,542	8,783	407
Black / African American	1,103	587	262	14
Asian	1,204	428	137	4
American Indian, Alaska Native	10	14	24	0
Pacific Islander	0	0	0	0
Hispanic	1,945	965	435	15

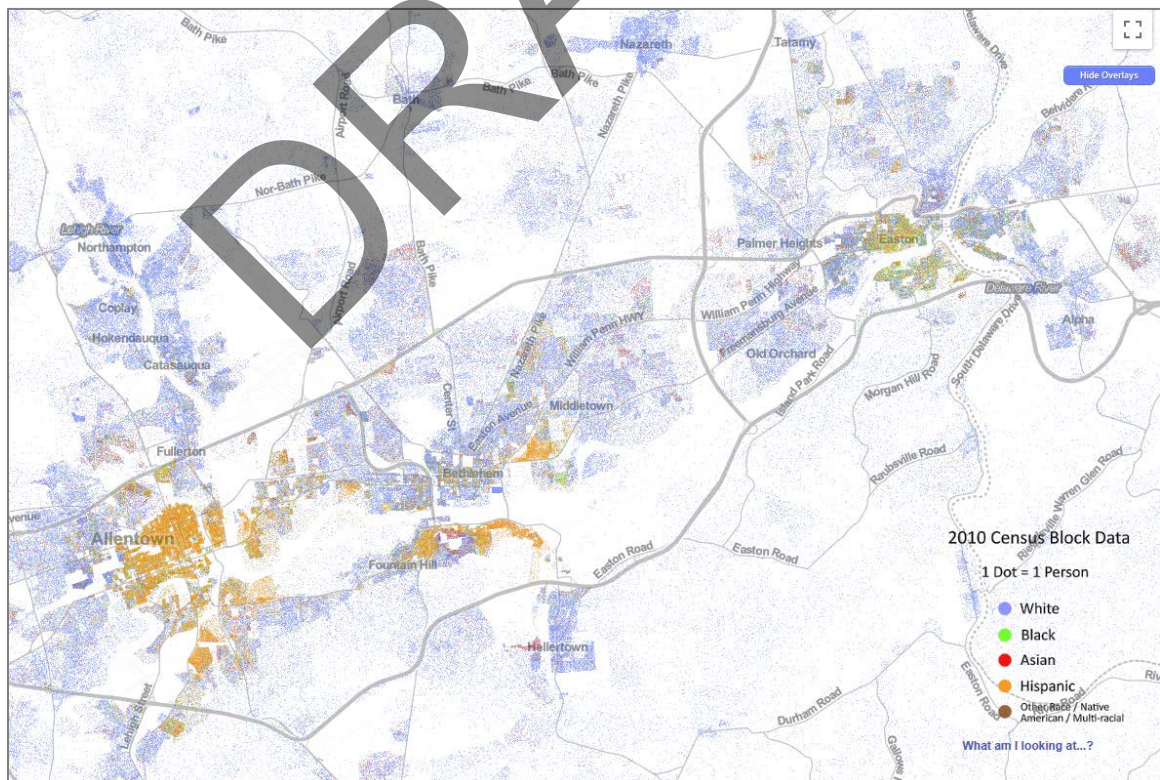
Source: 2011-2015 CHAS

The racial/ethnic household composition of the County according to the 2011-2015 ACS was 89.9% White, 4.1% Black/African American, 2.2% Asian, 0.2% American Indian Alaska Native, 0.0% Pacific Islander and 9.1% Hispanic. None (0) of the racial/ethnic groups were disproportionately affected by housing cost burdens.

## J. Segregation

The following map is a racial dot map representing one dot for every person counted during the 2010 Census. Each dot is color-coded by the individual's race and ethnicity. White individuals are coded as blue; Black individuals, green; Asian individuals, red; Hispanic individuals, orange; and all Other racial categories are coded as brown. The map was created by the University of Virginia Weldon Cooper Center for Public Service Demographics Research Group. The map provides a picture of any areas that may have a grouping of non-White residents. The City of Allentown has a high concentration of Hispanic individuals, as well as southern Bethlehem. The City of Easton has a high concentration of Hispanic and Black individuals. The non-urban areas have the highest concentrations of White individuals.

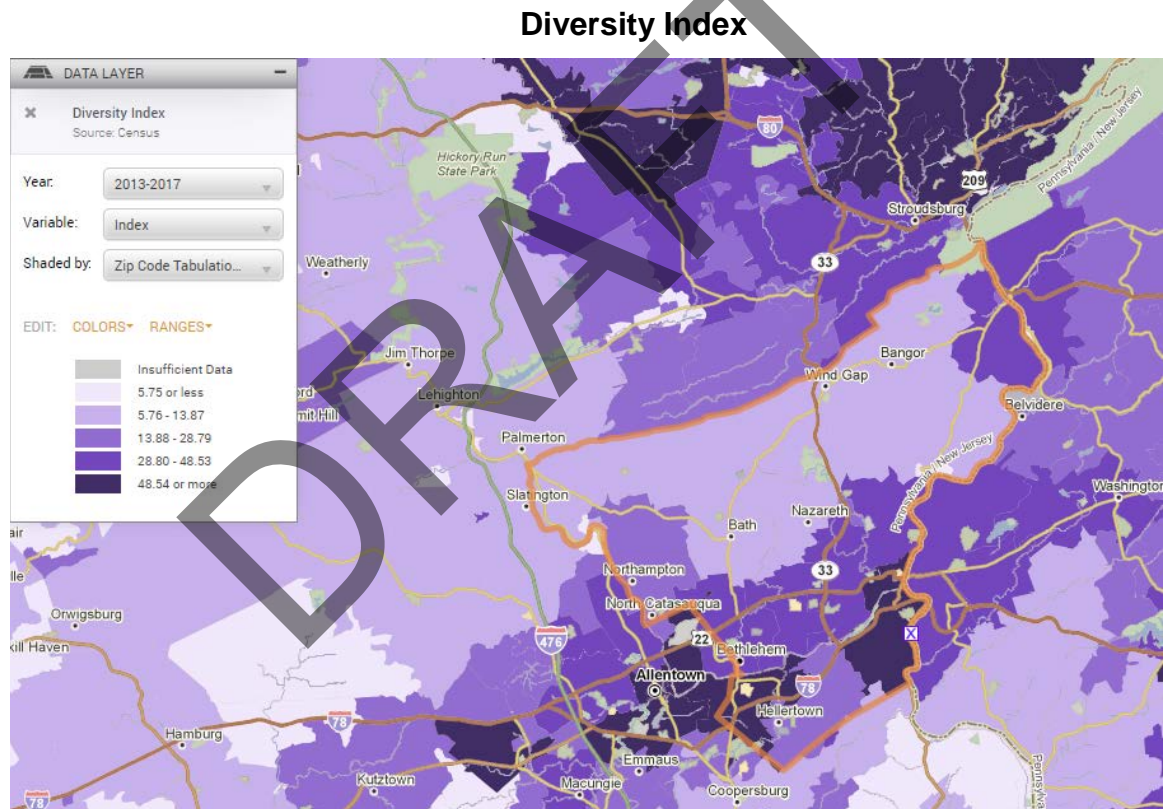
**Racial Dot Map**



Source: [demographics.coopercenter.org/racial-dot-map](http://demographics.coopercenter.org/racial-dot-map)



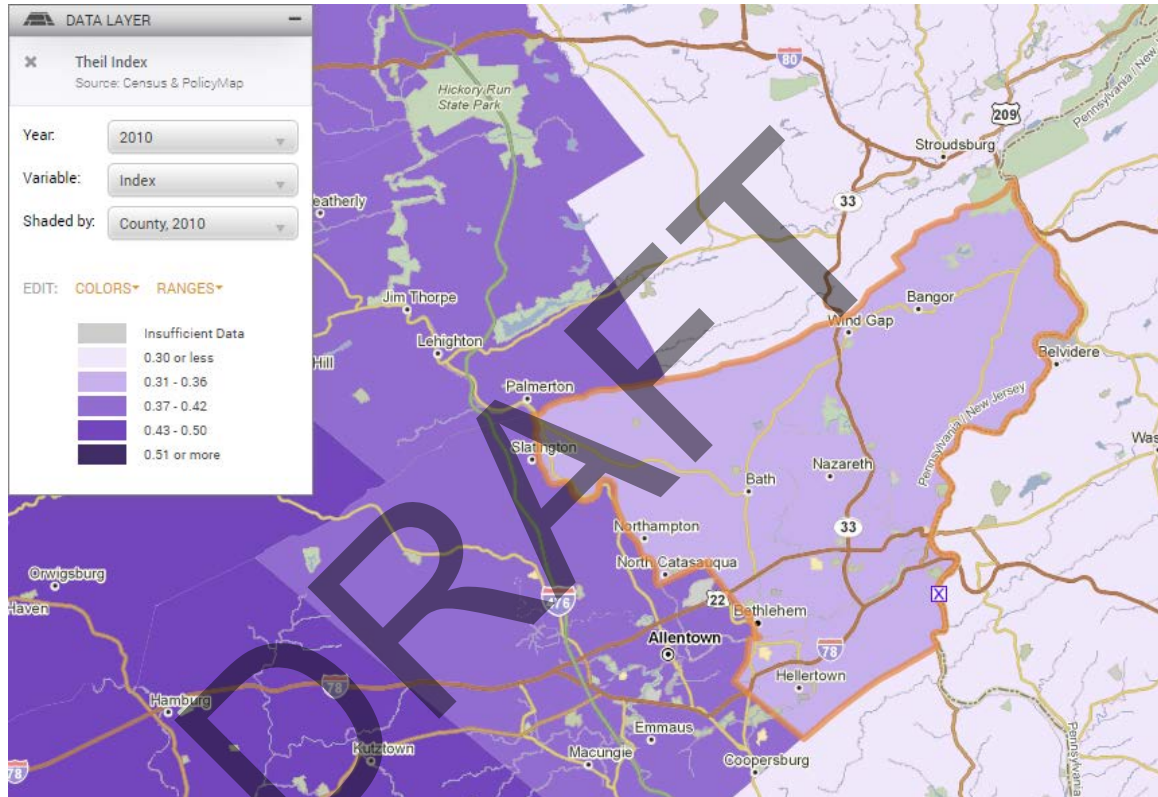
The following map calculates the diversity index per Census Tract in the Lehigh Valley. “The diversity index is an index ranging from 0 to 87.5 that represents the probability that two individuals, chosen at random in the given geography, would be of different races or ethnicities between 2013-2017. Lower index values between 0 and 20 suggest more homogeneity and higher index values above 50 suggest more heterogeneity. Racial and ethnic diversity can be indicative of economic and behavioral patterns. For example, racially and ethnically homogenous areas are sometimes representative of concentrated poverty or concentrated wealth. They could also be indicative of discriminatory housing policies or other related barriers. Data were obtained from the Census' American Community Survey 2013-2017 estimates and calculated by PolicyMap.” (Source: PolicyMap.com) The urban areas have diversity indices around and over 50, while the non-urban areas have diversity indices between 5 and 30.



The following map provides the Theil Index calculations per Census Tract in the Lehigh Valley. “The Theil Index is an index ranging from 0 to 1 that displays information about racial segregation. Lower index values below .20 suggest less segregation and higher index values above .40 suggest more segregation. The Theil Index is a measure of how evenly members of racial and ethnic groups are distributed within a region, calculated by comparing the diversity of all sub-regions (Census Blocks) to the region as a whole. Patterns of racial

segregation can emerge as a result of systemic barriers and opportunities or localized individual preferences. For example, highly segregated areas may be indicative of discriminatory housing practices or other related barriers. Data used in the calculation of this index were derived from the U.S. Census Bureau's 2010 Decennial Census." (Source: PolicyMap.com) The Theil Index for all areas of the Lehigh Valley reveal moderate levels of segregation in the Lehigh Valley.

### Theil Index



Source: [www.policymap.com/maps](http://www.policymap.com/maps)

HUD defines a racially/ethnically concentrated area of poverty (R/ECAP) as a census tract where the number of families in poverty is equal to or greater than 40% percent of all families, or an overall family poverty rate equal to or greater than three times the metropolitan poverty rate, and a non-white population, measured at greater than 50 percent of the population. The following CTs are identified by HUD as R/ECAP:

- CT 000400 Allentown
- CT 000500 Allentown
- CT 000800 Allentown
- CT 000900 Allentown
- CT 001000 Allentown
- CT 001200 Allentown

- CT 001401 Allentown
- CT 001600 Allentown
- CT 001800 Allentown
- CT 009600 Allentown
- CT 009700 Allentown
- CT 010500 Bethlehem
- CT 011000 Bethlehem
- CT 011200 Bethlehem
- CT 014300 Easton

## K. Data on Disability

### Allentown

The following table includes the 2013-2017 ACS estimates for the number of individuals with disabilities in the City of Allentown. The total population of persons with disabilities in the City of Allentown is estimated to be 21,511 persons which represents 18.3% of the total population of the City. The two largest disability types are cognitive and ambulatory difficulties. A hearing difficulty is defined as deaf or having serious difficulty hearing (DEAR). A vision difficulty is defined as blind or having serious difficulty seeing, even when wearing glasses (DEYE). A cognitive difficulty is defined as because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions (DREM). An ambulatory difficulty is defined as having serious difficulty walking or climbing stairs (DPHY). A self-care difficulty is defined as having difficulty bathing or dressing (DDRS).

#### Persons with Disabilities in the City of Allentown

Disability Status of the Civilian Non-Institutional Population	2006-2010 ACS		2013-2017 ACS	
	#	%	#	%
Total Civilian Population	115,455	-	117,844	-
Total Population with a disability	19,509	16.9%	21,511	18.3%
Population under 5 years	228	2.2%	63	0.7%
With a hearing difficulty	209	2.0%	45	0.5%

With a vision difficulty	51	0.5%	18	0.2%
Population 5 to 17 years	2,365	10.8%	3,217	14.1%
With a hearing difficulty	140	0.6%	205	0.9%
With a vision difficulty	547	2.5%	506	2.2%
With a cognitive difficulty	1,833	8.4%	2,737	12.0%
With an ambulatory difficulty	130	0.6%	420	1.8%
With a self-care difficulty	221	1.0%	443	1.9%
Population 18 to 64 years	11,191	15.9%	13,025	34.7%
With a hearing difficulty	1,821	2.6%	2,042	2.8%
With a vision difficulty	2,897	4.1%	3,266	4.5%
With a cognitive difficulty	5,711	8.1%	7,113	9.8%
With an ambulatory difficulty	5,383	7.7%	5,323	7.3%
With a self-care difficulty	1,628	2.3%	2,100	2.9%
With an independent living difficulty	2,923	4.2%	3,435	4.7%
Population 65 years and over	5,725	44.2%	2,091	29.3%
With a hearing difficulty	1,900	14.7%	1,869	14.2%
With a vision difficulty	1,269	9.8%	1,253	9.5%
With a cognitive difficulty	1,209	9.3%	1,753	13.3%

With an ambulatory difficulty	3,616	27.9%	3,224	24.4%
With a self-care difficulty	1,003	7.7%	1,139	8.6%
With an independent living difficulty	2,266	17.5%	2,074	15.7%
<b>SEX</b>				
Male	8,831	15.9%	9,794	17.2%
Female	10,678	17.8%	11,717	19.2%
<b>HISPANIC/LATINO ORIGIN</b>				
White alone	12,445	16.4%	13,330	19.2%
Black or African American alone	2,493	16.8%	2,703	16.3%
American Indian and Alaska Native alone	0	0.0%	52	9.4%
Asian alone	178	7.6%	312	12.2%
Native Hawaiian and Other Pacific Islander alone	0	0.0%	23	22.5%
Some other race alone	3,632	19.8%	4,217	18.3%
Two or more races	618	16.8%	874	16.0%
White alone, not Hispanic or Latino	9,089	17.1%	7,898	19.8%
Hispanic or Latino (of any race)	7,998	17.3%	10,732	17.8%

Source: 2006-2010 and 2013 – 2017 American Community Survey

## Bethlehem

The following table includes the 2013-2017 ACS estimates for the number of individuals with disabilities in the City of Bethlehem. The total population of persons with disabilities in the City of Bethlehem is estimated to be 10,472 persons which represents 14.1% of the total population of the City. The two largest disability types are cognitive and ambulatory difficulties. A hearing difficulty is defined as deaf or having serious difficulty hearing (DEAR). A vision difficulty is defined as blind or having serious difficulty seeing, even when wearing glasses (DEYE). A cognitive difficulty is defined as because of a



physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions (DREM). An ambulatory difficulty is defined as having serious difficulty walking or climbing stairs (DPHY). A self-care difficulty is defined as having difficulty bathing or dressing (DDRS).

### Persons with Disabilities in the City of Bethlehem

Disability Status of the Civilian Non-Institutional Population	2006-2010 ACS		2013-2017 ACS	
	#	%	#	%
Total Civilian Population	73,903	-	74,350	-
Total Population with a disability	9,459	12.8%	10,472	14.1%
Population under 5 years	12	0.3%	0	0.0%
With a hearing difficulty	12	0.3%	0	0.0%
With a vision difficulty	0	0.0%	0	0.0%
Population 5 to 17 years	882	8.2%	1,006	10.3%
With a hearing difficulty	57	0.5%	16	0.2%
With a vision difficulty	177	1.6%	131	1.3%
With a cognitive difficulty	670	6.2%	895	9.2%
With an ambulatory difficulty	77	0.7%	103	1.1%
With a self-care difficulty	48	0.4%	171	1.8%
Population 18 to 64 years	4,705	9.8%	5,808	23.1%
With a hearing difficulty	953	2.0%	793	1.6%

With a vision difficulty	830	1.7%	1,046	2.1%
With a cognitive difficulty	2,061	4.3%	3,074	6.2%
With an ambulatory difficulty	224	4.6%	2,836	5.8%
With a self-care difficulty	742	1.5%	1,042	2.1%
With an independent living difficulty	1,487	3.1%	2,193	4.5%
Population 65 years and over	3,860	35.1%	3,658	68.5%
With a hearing difficulty	1,492	13.6%	1,324	12.0%
With a vision difficulty	869	7.9%	802	7.3%
With a cognitive difficulty	817	7.4%	812	7.4%
With an ambulatory difficulty	2,279	20.7%	2,121	19.2%
With a self-care difficulty	830	7.5%	699	6.3%
With an independent living difficulty	2,030	18.4%	1,512	13.7%
<b>SEX</b>				
Male	3,876	11.1%	4,761	13.1%
Female	5,583	14.3%	5,711	15.0%
<b>HISPANIC/LATINO ORIGIN</b>				
White alone	7,258	12.5%	8,236	14.1%
Black or African American alone	545	10.5%	702	13.4%
American Indian and Alaska Native alone	0	0.0%	92	34.5%
Asian alone	0	0.0%	130	5.9%

Native Hawaiian and Other Pacific Islander alone	0	0.0%	0	0.0%
Some other race alone	1,200	20.3%	772	18.6%
Two or more races	324	16.0%	540	13.4%
White alone, not Hispanic or Latino	6,158	12.5%	5,971	13.4%
Hispanic or Latino (of any race)	2,780	15.5%	3,561	16.7%

Source: 2006-2010 and 2013–2017 American Community Survey

### Easton

The following table includes the 2013-2017 ACS estimates for the number of individuals with disabilities in the City of Easton. The total population of persons with disabilities in the City of Easton is estimated to be 3,353 persons which represents 12.8% of the total population of the City. The two largest disability types are cognitive and ambulatory difficulties. A hearing difficulty is defined as deaf or having serious difficulty hearing (DEAR). A vision difficulty is defined as blind or having serious difficulty seeing, even when wearing glasses (DEYE). A cognitive difficulty is defined as because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions (DREM). An ambulatory difficulty is defined as having serious difficulty walking or climbing stairs (DPHY). A self-care difficulty is defined as having difficulty bathing or dressing (DDRS).

### Persons with Disabilities in the City of Easton

Disability Status of the Civilian Non-Institutional Population	2006-2010 ACS		2013-2017 ACS	
	#	%	#	%
Total Civilian Population	24,627	-	26,145	-
Total Population with a disability	4,222	17.1%	3,353	12.8%
Population under 5 years	0	0.0%	52	3.8%
With a hearing difficulty	0	0.0%	0	0.0%
With a vision difficulty	0	0.0%	52	3.8%

Population 5 to 17 years	526	12.8%	242	5.8%
With a hearing difficulty	83	2.0%	0	0.0%
With a vision difficulty	0	0.0%	52	3.8%
With a cognitive difficulty	512	12.5%	214	5.2%
With an ambulatory difficulty	26	0.6%	6	0.1%
With a self-care difficulty	26	0.6%	23	0.6%
Population 18 to 64 years	2,606	15.7%	1,893	20.6%
With a hearing difficulty	272	1.6%	160	0.9%
With a vision difficulty	543	3.3%	306	1.7%
With a cognitive difficulty	1,096	6.6%	908	5.2%
With an ambulatory difficulty	1,348	8.1%	1,028	5.9%
With a self-care difficulty	285	1.7%	260	1.5%
With an independent living difficulty	720	4.3%	621	3.5%
Population 65 years and over	1,090	45.4%	1,166	79.7%
With a hearing difficulty	318	13.2%	320	10.3%
With a vision difficulty	297	12.4%	211	6.8%
With a cognitive difficulty	335	13.9%	335	10.8%
With an ambulatory difficulty	680	28.3%	859	27.7%

With a self-care difficulty	292	12.2%	348	11.2%
With an independent living difficulty	595	24.8%	641	20.7%
<b>SEX</b>				
Male	1,930	21.2%	1,434	11.0%
Female	2,292	12.4%	1,919	14.6%
<b>HISPANIC/LATINO ORIGIN</b>				
White alone	3,430	0.0%	2,449	13.7%
Black or African American alone	567	0.0%	555	14.3%
American Indian and Alaska Native alone	0	0.0%	6	1.8%
Asian alone	0	0.0%	21	2.4%
Native Hawaiian and Other Pacific Islander alone	0	0.0%	0	0.0%
Some other race alone	0	0.0%	118	9.7%
Two or more races	0	0.0%	204	10.8%
White alone, not Hispanic or Latino	2,830	19.9%	2,180	14.8%
Hispanic or Latino (of any race)	798	18.1%	577	10.0%

Source: 2006-2010 and 2013-2017 American Community Survey

### Northampton County

The following table includes the 2013-2017 ACS estimates for the number of individuals with disabilities in Northampton County. The total population of persons with disabilities in Northampton County is estimated to be 37,083 persons which represents 12.4 percent of the total population of the County. The two largest disability types are cognitive and ambulatory difficulties. A hearing difficulty is defined as deaf or having serious difficulty hearing (DEAR). A vision difficulty is defined as blind or having serious difficulty seeing, even when wearing glasses (DEYE). A cognitive difficulty is defined as because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions (DREM). An ambulatory difficulty is defined

as having serious difficulty walking or climbing stairs (DPHY). A self-care difficulty is defined as having difficulty bathing or dressing (DDRS).

### Persons with Disabilities in Northampton County

Disability Status of the Civilian Non-Institutional Population	2006-2010 ACS		2013-2017 ACS	
	#	%	#	%
Total Civilian Population	292,025	-	298,131	-
Total Population with a disability	35,103	12.0%	37,083	12.4%
Population under 5 years	30	0.2%	119	0.8%
With a hearing difficulty	12	0.1%	67	0.4%
With a vision difficulty	18	0.1%	110	0.7%
Population 5 to 17 years	3,297	6.7%	2,886	6.2%
With a hearing difficulty	390	0.8%	181	0.4%
With a vision difficulty	202	0.4%	395	0.9%
With a cognitive difficulty	2,782	5.7%	2,474	5.3%
With an ambulatory difficulty	207	0.4%	260	0.6%
With a self-care difficulty	416	0.8%	489	1.1%
Population 18 to 64 years	16,170	8.8%	17,336	17.2%
With a hearing difficulty	3,281	1.8%	2,909	1.6%

With a vision difficulty	2,580	1.4%	2,930	1.6%
With a cognitive difficulty	6,392	3.5%	7,627	4.1%
With an ambulatory difficulty	8,022	4.4%	8,407	4.5%
With a self-care difficulty	2,656	1.5%	2,735	1.5%
With an independent living difficulty	5,369	2.9%	5,810	3.1%
Population 65 years and over	15,606	35.6%	16,742	67.8%
With a hearing difficulty	6,467	14.8%	6,259	12.1%
With a vision difficulty	2,726	6.2%	2,693	5.2%
With a cognitive difficulty	3,640	8.3%	4,115	8.0%
With an ambulatory difficulty	9,487	21.7%	10,503	20.4%
With a self-care difficulty	3,217	7.3%	3,641	7.1%
With an independent living difficulty	7,147	16.3%	7,613	14.8%
<b>SEX</b>				
Male	15,450	10.8%	17,208	11.7%
Female	19,653	13.1%	19,875	13.1%
<b>HISPANIC/LATINO ORIGIN</b>				
White alone	31,385	12.3%	32,571	12.7%
Black or African American alone	1,393	9.9%	2,003	12.6%
American Indian and Alaska Native alone	121	21.4%	151	13.7%
Asian alone	286	3.9%	496	6.0%

Native Hawaiian and Other Pacific Islander alone	0	0.0%	14	26.4%
Some other race alone	1,326	14.6%	827	13.2%
Two or more races	592	10.0%	1,021	10.6%
White alone, not Hispanic or Latino	29,242	12.3%	29,402	12.7%
Hispanic or Latino (of any race)	4,119	13.9%	4,987	13.4%

Source: 2006-2010 and 2013–2017 American Community Survey

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### **III. Review/Update to Original Plan**

Northampton County's current "Regional Analysis of Impediments to Fair Housing Choice" was dated November 2013 and included Lehigh County, Northampton County, City of Allentown, City of Bethlehem and City of Easton. The participants review their progress in addressing the goals of the AI twice a year during the participants' preparation of the Annual Action Plan and the Consolidated Annual Performance Evaluation Reports (CAPER). The Regional Analysis of Impediments to Fair Housing Choice identified the following impediments, as well as created goals and strategies to address each impediment.

#### **A. Summary of Impediments Allentown:**

##### **Impediment 1: Steering by Real Estate Agents**

Actions - Outreach and training of Real Estate Agents: During the program year, NPLS, as part of the Fair Housing Consortium work, provided outreach and training to the Greater LV Board of Realtors. Seven training sessions were held, with 313 attendees and 175 brochures were give out. (Source: FY 2019 CAPER)

##### **Impediment 2: Disparities in Mortgage Lending**

Action - Worked with Fair Housing Consortium (members with Cities of Bethlehem, Easton and Counties of Northampton and Lehigh) to determine how to address; began discussions about how best to address. (Source: FY 2019 CAPER)

##### **Impediment 3: Need for Increased Fair Housing Education**

Action - Continued to fund the Fair Housing Consortium which works and funds North Penn Legal Services to provide fair housing educations throughout the year. The Consortium and NPLS provided 29 education sessions reaching over 850 persons. Finally, during Fair Housing month and beyond, the Consortium paid for an advertising campaign on area buses, promoting fair housing and noting where to go for help. (Source: FY 2019 CAPER)

##### **Impediment 4: Need for Increased Coordination among Fair Housing Providers**

Action - Continued to work with the Fair Housing Consortium, North Penn Legal Services and other fair housing providers to promote and coordinate fair housing education. Held quarterly meetings with the Consortium. In collaboration with the City of Bethlehem, coordinated NPLS to present a fair

housing seminar to the HUD funded housing providers who work in both cities. (Source: FY 2019 CAPER)

### **Impediment 6: Condition of Affordable Housing Stock**

Action - Funded programs to improve condition of affordable housing stock within the CCI area. Funded programs to address housing stock. (Source: FY 2019 CAPER)

## **B. Summary of Impediments Bethlehem:**

### **Impediment 1: Disparities in Mortgage Lending**

Bethlehem joined other Lehigh Valley grantees in support of North Penn Legal Services, an organization that provides Fair Housing information and advocacy in the region, and continued to do so in the 2019 Program Year. While looking for ways to fund the recommended testing of lenders, North Penn Legal continued its public Fair Housing education efforts, including a bus advertising campaign and a Fair Housing Forum. Topics included information on filing complaints on housing issues, including possible lending discrimination. The City of Bethlehem continued to actively support those efforts with CDBG funds and by linking the City website to the North Penn Legal Services website for Fair Housing information. (Source: FY 2019 CAPER)

### **Impediment 2: Need for Increased Fair Housing Education**

The City of Bethlehem continued to partner with the other Lehigh Valley grantees to support North Penn Legal Services' fair housing efforts and to plan improvements to North Penn's Lehigh Valley Fair Housing Project. These improvements center on reaching minority and disabled populations as well as landlords/property managers. Through the Project, during the 2019 Program Year, the communities of the Lehigh Valley, including the City of Bethlehem:

- Provided assistance to at least 60 residents to resolve potential fair housing violations (included at least 15 Bethlehem residents)
- Educated 500 residents, including at least 100 from Bethlehem, on fair housing rights and recourses
- Disseminated 800 copies of "The Right Stuff About Renting" to provide tenants with information about their rights, including those under fair housing laws
- Provided six training sessions for Realtors; Offered outreach sessions and other educational opportunities to promote Fair Housing Awareness Month in April

### **Impediment 3: Need for Increased Coordination among Fair Housing**

The City of Bethlehem takes part in the Lehigh Valley Fair Housing Advisory Committee with other entitlement communities and fair housing organizations in the region to plan Fair Housing Awareness Day and other campaigns.

### **Impediment 6: Condition of Affordable Housing Stock**

During 2019, Bethlehem continued activities that rehabilitated owner-occupied housing (29 units) and supported efforts to rehabilitate vacant units for sale to eligible households (15 units).

## **C. Summary of Impediments Easton:**

The City of Easton completed the following activities to fulfill its obligation to Affirmatively Further Fair Housing during the 2017 Program Year that address fair housing impediments identified in the Lehigh Valley Analysis of Impediments to Fair Housing Choice (Source FY 2017 CAPER):

- Supported the Community Action Committee of the Lehigh Valley, Safe Harbor and the Third Street Alliance, all of which address the need for fair housing education and advocacy.
- Supported housing rehab and code enforcement programs, both of which address the impediment that poor housing conditions can present.
- Supported economic development and community improvements, including fire equipment, sewer reconstruction and neighborhood facilities, all of which address issues relating to quality of life and access to opportunity.
- Supported a variety of other public services that, likewise, address issues relating to quality of life and access to opportunity.

## **D. Summary of Impediments Northampton County:**

### **Impediment 1: Disparities in Mortgage Lending**

According to 2011 Home Mortgage Disclosure Act (HMDA) data, and after controlling for income level, Whites had the lowest mortgage denial rates in every income tier. In fact, low income Whites had a lower rate of mortgage denial than minorities of moderate and even high income levels. Blacks were denied loans at rates which increased with income: 28.1% for low income, 32.4% for moderate, and 34.5% at the higher income bracket. Moderate income Hispanics were denied loans at higher rates than those with low or high incomes. Denial rates for Asians were lower than for other minority groups but still much higher than Whites. Pacific Islanders had the highest denial rates of

any group at all income levels. The presence of disparities alone is not evidence enough to prove outright discrimination (there may be legitimate factors such as credit score, job history, and collateral that result in these loan denial patterns) but they do have the effect of limiting the housing choice of would-be borrowers.

North Penn Legal Services and the Community Action Committee of the Lehigh Valley are reviewing and meeting with banking officials. Two of our banking partners are undergoing a merger and the new banking firm will meet with our community action corporation over the number of loans and their locations. (Source FY 2018 CAPER)

### **Impediment 2: Need for Increased Fair Housing Education**

The Lehigh Valley Fair Housing Project, undertaken by North Penn Legal Services, is roundly praised for its success at organizing events and sustaining education campaigns, including bus advertising. The project receives funding from each of the five local CDBG entitlement communities and is therefore a testament to the cooperative posture of these jurisdictions when it comes to fair housing education. As helpful as these efforts are, numerous indicators point to the need to do even more. In the fair housing survey conducted as part of this analysis, 46.3% of respondents claimed they did not know their fair housing rights; another 32.5% knew them “somewhat”, leaving barely one in five residents aware of the protections afforded them by fair housing law. More than two-thirds of survey respondents stated they did not know where to file a fair housing complaint. Increased education is also needed for landlords and property owners. Of those respondents to the survey believing they had been discriminated against, 71.4% said the discrimination had been perpetrated by a landlord or property owner. Also, underscoring this need is the *Newell v. Traditions of Hanover* lawsuit where a property manager (responsible for multiple senior living facilities throughout Pennsylvania) is alleged to have discriminated against prospective tenants with disabilities.

Greater Lehigh Valley Realtors (GLVR) Presents Housing Equality Proclamation to Bradbury- Sullivan Center At the request of the Bradbury-Sullivan LGBT Community Center and Pennsylvania Youth Congress, the Greater Lehigh Valley Realtors readily agreed to join a coalition of organizations and associations in the promotion of anti-discriminatory practices in housing. GLVR has now added a New Director of Professional Development. This position at the Association, is responsible for the educational training and professional development needs of the membership, as well as the Professional Standards process. North Penn Legal Services also conducts landlord training on compliance with the fair housing act. (Source FY 2018 CAPER)

### **Impediment 3: Need for Increased Coordination among Fair Housing**

The five entitlement communities participate in a fair housing partnership with North Penn Legal Services, which representatives roundly praise and see as having been successful. This partnership consolidates the fair housing work that otherwise would have been carried out by city and county staff in the five different jurisdictions. However, some other fair housing providers with a presence in the Lehigh Valley, particularly the various local human relations commissions, are not well integrated into this partnership. Local human relations commissions exist in Allentown, Bethlehem, and Easton, but their role is unclear and their effectiveness is varied, some depending completely on volunteer staffing. The efforts of these organizations are generally not concerted.

North Penn Legal Services and the Greater Lehigh Valley Realtors have increased their relationship with the new initiatives that GLVR has instituted this year. Additional land lord training events will also be held. (Source FY 2018 CAPER)

### **Impediment 4: Zoning Provisions Impacting People with Disabilities**

The zoning ordinances adopted by Northampton County municipalities were generally determined to pose a high risk for limitation of housing choice and/or discrimination against people with disabilities. Great variation exists among the 37 zoning codes in place within the county. Many of these codes make it unreasonably difficult for persons with disabilities to make reasonable modifications to their property, restrict group homes from residential districts, require special permitting from them, impose spacing requirements between them, and restrict placement of group homes based on their requirements for onsite supportive services. Rather than include accessibility and other similar provisions in their individual codes, many municipalities rely instead upon the Pennsylvania Uniform Construction Code which applies statewide standards for all new construction, rehabilitation, and building inspections. The Uniform Construction Code is a noteworthy state law that provides an important backstop to the rights of people with disabilities, however, the presence of a state law may not be as effective at ensuring fair housing choice as would be the same provisions if codified locally.

The County interceded previously in several situations regarding placement of group homes. These actions were widely publicized and there has been no other questions regarding group homes. The County funds the Lehigh Valley Center for Individuals with Disabilities and they work with county municipalities on issues regarding accessibility. (Source FY 2018 CAPER)

### **Impediment 5: Zoning Provisions Restricting Residential Uses From Residential Districts**

Many Northampton County municipalities restrict inherently residential land uses (such as shelters or residential treatment facilities) from some or all residential zones. The specific “inherently residential” uses are defined differently from one municipality to another, but in these cases, the zoning code clearly contemplates residential use (as opposed to only day use) of the facility type in question. At least 20 Northampton County municipalities have zoning ordinances with this type of restriction. The table on the previous page displays each municipality’s average total risk score; details of each individual ordinance and its position on these issues can be found in the appendix.

The County funds the Lehigh Valley Planning Commission which in turn has developed a set of revised Zoning ordinances as templates for each municipality to review modify as necessary and then adopt. (Source FY 2018 CAPER)

### **Impediment 6: Condition of Affordable Housing Stock**

The Lehigh Valley is fortunate to have an ample supply of affordable housing. Especially when compared with the large surrounding cities like Philadelphia and New York, the relatively low cost of housing in the Lehigh Valley stands out. Though the region’s housing stock tends to be relatively affordable, it also tends to be old (over 50% was built prior to 1970), inaccessible to people with disabilities, expensive to maintain, and prone to falling into substandard condition. Over 5% of Lehigh Valley homeowners without a mortgage spend more than 30% of their income on housing expenses, reflecting high utility and maintenance costs, likely tied to the age of the housing stock. Stakeholders interviewed in the course of this analysis often referred to substandard conditions in the most affordable housing; several described problems with slumlords in their communities.

The County has added the City of Easton into their urban consortium which will allow for HOME entitlement funds towards programs regarding the housing stock. The County and Easton have Home Improvement programs and apply for additional funds towards improving the housing stock. The County provided rehabilitation financial assistance to twelve (12) single-family owner-occupied households during the FY 2018 period. (Source FY 2018 CAPER)

### **Impediment 7: Public Perceptions Regarding Transportation Connectivity**

LANta, the Lehigh Valley’s public transportation system, does an admirable job of networking the community given the region’s three urban hubs and large rural areas. Concepts such as the Alburtis/Macungie Flex Zone are expanding LANta’s Services in a careful, cost-controlled manner. In the fair housing survey

conducted as part of this analysis, a remarkable 73.1% of respondents said that public transportation was available in their neighborhood. However, only 45.5% said that public transportation provided access to major employers, and only 23.1% believed that LANTa service schedules coincided with their work schedules. It is worth noting that 22.8% of respondents did not know whether public transportation was available to major employers and 47% did not know whether transit scheduled coincided with their work schedules.

The County continued to participate and collaborate with its partners to connect rider demand to scheduling and routing. (Source FY 2018 CAPER)

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## IV. Impediments to Fair Housing 2021

Impediments to fair housing choice are defined as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice
- Any actions, omissions, or decisions that have this effect. In order to determine if any impediments to fair housing choice exist, interviews and meetings were conducted, surveys were distributed, Census data was reviewed, and an analysis of the fair housing complaints in the area was undertaken.

The following section will identify impediments to fair housing choice in the Lehigh Valley.

### A. Fair Housing Complaints:

#### 1. North Penn Legal Services

North Penn Legal Services (NPLS) is a nonprofit organization providing civil legal aid to low-income residents of Northeastern Pennsylvania. NPLS provides legal assistance so that people can know their rights and receive free legal representation in non-criminal matters such as eviction from housing, discrimination, family law, and consumer protection issues. The mission of North Penn Legal Services (NPLS) is to provide civil legal representation to low-income people and ensure equal access to justice for all.

**North Penn Legal Services**  
559 Main Street, Suite 200  
Bethlehem, PA 18018-5881  
610-317-8757  
[www.northpennlegal.org](http://www.northpennlegal.org)

NPLS is the designated area fair housing agency and is a subrecipient of CDBG funds for fair housing activities from all of the entitlements. The partners direct all fair housing complaints to NPLS for consultation.

#### 2. Housing Equality Center of Pennsylvania

The Housing Equality Center of Pennsylvania (formerly Fair Housing Council of Suburban Philadelphia) is America's oldest fair housing council. The Housing Equality Center's service area includes the Pennsylvania counties of Bucks, Chester, Delaware, Lehigh, Montgomery, Northampton and

**Housing Equality  
Center of Pennsylvania**  
PO Box 558  
Fort Washington, PA 19034  
267-419-8918  
866-540-FAIR  
[www.equalhousing.org](http://www.equalhousing.org)



Philadelphia. The organization's education and technical assistance programs support housing professionals throughout Pennsylvania.

The Housing Equality Center (HCE) offers a variety of programs and services to the general public to ensure that consumers have access to housing and understand their rights under fair housing laws. Additional programs and services are available to ensure that housing professionals understand and comply with fair housing laws. The Housing Equality Center provides:

- Counseling and conducts testing investigations to help housing discrimination victims.
- Education and training programs for housing professionals, nonprofits, housing authorities and others to promote compliance with fair housing laws and to prevent discrimination.
- Publications, fact sheets and resources to educate the public and housing professionals about fair housing.

HCE has received CDBG funds from the partner entitlements in the past.

### 3. Pennsylvania Human Relations Commission

The Pennsylvania Human Relations Commission (PHRC) enforces state laws that prohibit discrimination under the Pennsylvania Human Relations Act, and the Pennsylvania Fair Education Opportunities Act. The Pennsylvania Fair Education Opportunities Act prohibits discriminatory practices based on race, religion, color, ancestry, national origin, or sex within education institutions. The Pennsylvania Human Relations Act prohibits certain discriminatory practices based on race, religious creed, color, ancestry, national origin, or age by employers, employment agencies, or labor organizations. Additionally, the Pennsylvania Human Relations Act created the PHRC under the Governor's office, with defined powers and a mission, which is, "*to promote equal opportunity for all and enforce Pennsylvania's civil rights laws that protect people from unlawful discrimination.*" (PHRC 2014-2017 Strategic Plan).

**Pennsylvania Human  
Relations Commission**  
333 Market Street, 8th Floor  
Harrisburg, PA 17101-2210  
(717) 787-4410  
[www.phrc.pa.gov](http://www.phrc.pa.gov)

The PHRC main office is in Harrisburg, doubling as a regional office, along with two other regional offices in Philadelphia and Pittsburgh. PHRC investigates employment discrimination complaints on behalf of the U.S. Equal Employment Opportunity Commission (EEOC) and housing discrimination complaints on behalf of the U.S. Department of Housing and

Urban Development (HUD). These partnerships protect the rights of complainants under both state and federal law.

The law also empowers the commission to educate the public in order to prevent discrimination and foster equal opportunity; and to address incidents of bias that may lead to tension between racial, ethnic and other groups.

#### 4. Fair Housing Assistance Program (FHAP) Agencies

The Fair Housing Assistance Program offers grants to state and local agencies that have sufficiently demonstrated to HUD that they support or enforce a fair housing law that is substantially equivalent to the Fair Housing Act. FHAP agencies carry out fair housing activities such as enforcement and education in order to protect families and individuals who believe that they have been the victims of housing discrimination.

The Lehigh Valley is supported by the following FHAPs:

- Pennsylvania Human Relations Commission
- North Penn Legal Services
- Housing Equality Center of Pennsylvania

#### 5. Fair Housing & Equal Opportunity (FHEO-HUD)



The U.S. Department of Housing and Urban Development's (HUD's) Office of Fair Housing & Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Fair Housing Act. According to the HUD FHEO complaint tracking system (TEAPOTS) the following complaints were filed from January 1, 2009 until May 30, 2019:

#### HUD REPORTED FAIR HOUSING COMPLAINTS 2009 - 2019

City of Allentown - January 1, 2009 - May 30, 2019						
Violation City	Violation State and County	Filing Date	Closure Date	Closure Reason	Basis	Issues
Allentown	Pennsylvania - Lehigh	05/15/14	09/03/15	ALJ consent order entered after issuance of charge	Familial Status	Discriminatory refusal to negotiate for rental; Discriminatory advertising, statements and notices; Discrimination in terms/condition/privileges relating to rental
Allentown	Pennsylvania - Lehigh	09/11/15	01/24/17	Conciliation/settlement successful	Race, National Origin	Discriminatory terms, conditions, privileges, or services and facilities; redlining - insurance
Allentown	Pennsylvania - Lehigh	03/20/09	05/08/09	Conciliation/settlement successful	Race	Discrimination in terms/conditions/privileges relating to rental

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Allentown	Pennsylvania - Lehigh	05/27/09	12/11/09	No cause determination	Disability	Discriminatory refusal to rent and negotiate for rental
Allentown	Pennsylvania - Lehigh	08/03/10	05/20/11	No cause determination	Race, Familial Status	Discrimination in terms/conditions/privileges relating to rental
Allentown	Pennsylvania - Lehigh	02/24/11	06/30/11	No cause determination	Race	Discriminatory refusal to rent and negotiate for rental
Allentown	Pennsylvania - Lehigh	04/12/11	06/30/11	No cause determination	Disability	Discriminatory terms, conditions, privileges, or services and facilities
Allentown	Pennsylvania - Lehigh	07/05/11	09/14/11	No cause determination	Sex, Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental
Allentown	Pennsylvania - Lehigh	11/16/11	07/09/12	Conciliation/settlement successful	Retaliation	Discrimination in terms/conditions/privileges relating to rental
Allentown	Pennsylvania - Lehigh	04/17/12	06/29/12	No cause determination	National Origin	Discrimination in terms/conditions/privileges relating to rental
Allentown	Pennsylvania - Lehigh	12/07/12	02/26/13	No cause determination	Disability	Discrimination in terms/conditions/privileges relating to rental
Allentown	Pennsylvania - Lehigh	01/29/14	06/02/14	Complaint withdrawn by complainant after resolution	Race	Discriminatory refusal to rent
Allentown	Pennsylvania - Lehigh	04/15/14	06/20/14	Complaint withdrawn by complainant after resolution	Disability	Failure to make reasonable accommodation
Allentown	Pennsylvania - Lehigh	11/05/14	02/11/15	No cause determination	Race	Discriminatory advertising, statements, and notices
Allentown	Pennsylvania - Lehigh	03/24/15	07/14/15	Complainant failed to cooperate	Race, Disability	Discriminatory refusal to rent
Allentown	Pennsylvania - Lehigh	05/11/15	09/14/15	No cause determination	Religion	Discriminatory terms, conditions, privileges, or services and facilities
Allentown	Pennsylvania - Lehigh	06/12/15	01/14/16	No cause determination	Race	Discriminatory refusal to rent
Allentown	Pennsylvania - Lehigh	07/23/15	09/17/15	No cause determination	Disability	Discriminatory refusal to rent
Allentown	Pennsylvania - Lehigh	08/06/15	01/14/16	No cause determination	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities
Allentown	Pennsylvania - Lehigh	10/19/15	12/23/15	Conciliation/settlement successful	Disability	Otherwise deny or make housing unavailable; Failure to make reasonable accommodation

BEAN Fair Housing Partnership

Allentown	Pennsylvania - Lehigh	02/19/16	05/12/16	Conciliation/settlement successful	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
Allentown	Pennsylvania - Lehigh	03/09/16	06/02/16	Complainant failed to cooperate	Disability	Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
Allentown	Pennsylvania - Lehigh	04/21/16	05/31/16	Conciliation/Settlement successful	National Origin, Disability	Discriminatory terms, conditions, privileges, or services and facilities
Allentown	Pennsylvania - Lehigh	10/18/16	03/30/17	Complaint withdrawn by complainant after resolution	Sex	Discriminatory in terms/conditions/ privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
Allentown	Pennsylvania - Lehigh	05/23/17	01/18/18	No cause determination	Disability	Failure to make reasonable accommodation
Allentown	Pennsylvania - Lehigh	06/26/17	02/13/18	No cause determination	Race	Discriminatory terms, conditions, privileges, or services and facilities
Allentown	Pennsylvania - Lehigh	07/20/17	09/21/17	Complaint withdrawn by complainant after resolution	National Origin, Disability	Discriminatory refusal to negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation

City of Bethlehem - January 1, 2009 - May 30, 2019						
Violation City	Violation State and County	Filing Date	Closure Date	Closure Reason	Basis	Issues
Bethlehem	Pennsylvania - Northampton	03/27/19	-	-	Familial Status	Discrimination in terms/conditions/ privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)
Bethlehem	Pennsylvania - Northampton	02/03/11	06/23/11	Conciliation/Settlement successful	Disability	Failure to make reasonable accommodation
Bethlehem	Pennsylvania - Northampton	06/10/16	01/13/17	Conciliation/Settlement successful	National Origin	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable
Bethlehem	Pennsylvania - Dauphin	07/18/16	09/15/16	Complaint withdrawn by complainant after resolution	Sex	Discriminatory terms, conditions, privileges, or services and facilities
Bethlehem	Pennsylvania - Lehigh	05/11/09	09/24/09	No cause determination	National Origin	Discriminatory refusal to negotiate for rental
Bethlehem	Pennsylvania - Lehigh	09/16/10	04/29/11	No cause determination	Disability	Discrimination in terms/conditions/ privileges relating to rental
Bethlehem	Pennsylvania - Lehigh	01/15/15	07/14/15	No cause determination	National Origin	Discriminatory refusal to rent
Bethlehem	Pennsylvania - Lehigh	08/07/17	11/01/17	Dismissed for lack of jurisdiction	Race, National Origin	Discriminatory terms, conditions, privileges, or services and facilities
Bethlehem	Pennsylvania - Northampton	01/06/09	03/15/10	No cause determination	Race	Discriminatory terms, conditions, privileges, or services and facilities
Bethlehem	Pennsylvania - Northampton	06/29/10	03/17/11	No cause determination	Disability	Failure to make reasonable accommodation
Bethlehem	Pennsylvania - Northampton	03/08/12	06/22/12	No cause determination	Disability	Failure to make reasonable accommodation
Bethlehem	Pennsylvania - Northampton	09/24/12	01/24/13	Conciliation/settlement successful	Sex, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
Bethlehem	Pennsylvania - Northampton	10/22/13	11/20/13	Complaint withdrawn by complainant after resolution	Disability	Failure to make reasonable accommodation
Bethlehem	Pennsylvania - Northampton	12/22/14	05/18/15	No cause determination	National Origin	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental
Bethlehem	Pennsylvania - Northampton	06/07/16	03/30/17	No cause determination	Race	Discriminatory refusal to rent
Bethlehem	Pennsylvania - Northampton	01/25/18	04/11/18	Complainant failed to cooperate	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation

City of Easton and Northampton County - January 1, 2009 - May 30, 2019						
Violation City	Violation State and County	Filing Date	Closure Date	Closure Reason	Basis	Issues
Bangor	Pennsylvania - Northampton	05/18/11	12/15/11	ALJ consent order entered after issuance of charge	Familial Status	Discriminatory advertising, statements, and notices
Mount Bethel	Pennsylvania - Northampton	04/12/18	-	-	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
Bangor	Pennsylvania - Northampton	10/01/18	-	-	Disability	Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
Bath	Pennsylvania - Northampton	03/08/13	04/21/14	Complaint withdrawn by complainant after resolution	Familial Status	Discrimination in terms/conditions/privileges relating to rental
Easton	Pennsylvania - Northampton	11/12/10	05/11/11	No cause determination	Disability	Discrimination in the making of loans
Easton	Pennsylvania - Northampton	08/17/11	12/05/11	Conciliation/settlement successful	National Origin	Discriminatory terms, conditions, privileges, or services and facilities
Easton	Pennsylvania - Northampton	10/20/11	04/18/12	No cause determination	Disability	Discriminatory refusal to rent; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation
Easton	Pennsylvania - Northampton	09/24/12	02/25/13	No cause determination	National Origin, Retaliation	Discrimination in terms/conditions/privileges relating to rental
Easton	Pennsylvania - Northampton	10/01/14	11/17/14	Complaint withdrawn by complainant after resolution	Disability	Discriminatory terms, conditions, privileges, or services and facilities
Easton	Pennsylvania - Northampton	07/10/15	09/10/15	Conciliations/settlement successful	Race, Sex	Discrimination in the selling of residential real property
Easton	Pennsylvania - Northampton	10/23/15	03/28/16	Complaint withdrawn by complainant after resolution	Race, Familial Status	Discrimination in terms/conditions/privileges relating to rental
Easton	Pennsylvania - Northampton	10/02/17	-	-	Race	Other discriminatory acts
Easton	Pennsylvania - Northampton	02/26/18	11/16/18	Complaint withdrawn by complainant without resolution	Familial Status	Discriminatory refusal to sell; Discriminatory advertisement - sale
Easton	Pennsylvania - Northampton	03/26/18	05/16/19	No cause determination	Familial Status	Discriminatory refusal to sell; Discrimination in the selling of residential real property; Discrimination in services and facilities relating to sale
Easton	Pennsylvania - Northampton	08/17/15	02/17/16	No cause determination	Race, Familial Status	Discriminatory refusal to rent

Easton	Pennsylvania - Northampton	07/10/15	08/27/15	Conciliation/settlement successful	Race, Sex	Discrimination in the selling of residential real property
Nazareth	Pennsylvania - Northampton	04/13/17	05/25/17	Conciliation/settlement successful	Disability	Discriminatory refusal to rent and negotiate for rental; Failure to make reasonable accommodation
Stockertown	Pennsylvania - Northampton	09/26/13	12/03/13	Complaint withdrawn by complainant after resolution	Religion	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental
Windgap	Pennsylvania - Northampton	04/22/15	03/01/16	No cause determination	Disability	Discriminatory refusal to rent

The majority of fair housing complaints over the past ten (10) years for the area covered disability and race. The majority of reported issues specific to disability were the “failure to make reasonable accommodations.” The majority of reported issues specific to race were “discrimination in terms/conditions/privileges relating to rental.”

### **National Trends**

The U.S. Department of Housing and Urban Development (HUD) funds the Office of Fair Housing and Equal Opportunity (FHEO), whose mission is to eliminate discrimination, promote economic opportunity, and achieve diversity. FHEO leads the nation in the enforcement, administration, development, and public understanding of Federal fair housing policies and laws. FHEO enforces laws that protect people from discrimination on the basis of race, color, religion, sex, national origin, disability, and familial status. FHEO releases annual reports to Congress, which provide information regarding complaints received during the particular year. The following table highlights the frequency of such housing complaints for the years of 2014, 2015, 2016, and 2017 (most recent year available) organized by basis of complaint. Note, the percentages for each year do not equal 100% and the number of complaints each year do not equal the total complaints across all areas. This is because there is often more than one basis for the filing of a fair housing complaint.

### **HUD and FHAP Housing Complaints Nationwide**

Basis	FY 2014		FY 2015		FY 2016		FY 2017	
	Number of Complaints	% of Total	Number of Complaints	% of Total	Number of Complaints	% of Total	Number of Complaints	% of Total
Disability	4,621	41%	4,605	42%	4,908	45%	4,865	59%
Race	2,383	21%	2,291	21%	2,154	20%	2,132	26%

Familial Status	1,051	9%	1,031	9%	882	8%	871	11%
National Origin	1,067	9%	898	8%	917	8%	834	10%
Sex	879	8%	915	8%	800	7%	826	10%
Religion	223	2%	225	2%	204	2%	800	10%
Color	146	1%	151	1%	143	1%	232	3%
Retaliation	867	8%	832	8%	785	7%	192	2%
<b>Number of Complaints filed</b>	<b>11,237</b>		<b>10,948</b>		<b>10,793</b>		<b>8,186</b>	

Source: HUD FY 2014-2017 Annual Reports on Fair Housing

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

The majority of the HUD complaints filed nationwide in 2017 were on the basis of disability, making up 59% of all complaints received. Race was next, making up 26% of all complaints, followed by familial status at 11%.

The housing complaints filed in the area were consistent with the most common causes for complaints across the nation.

## 6. Local Human Rights Commissions

The cities of Allentown, Bethlehem, and Easton have ordinances concerning discrimination and the formation of Human Relations Commissions. The City of Allentown recognizes the following protected classes, “race, color, religion, national origin, ancestry or place of birth, sex, gender identity, sexual orientation, disability, marital status, age or use of a guide or support animal because of blindness, deafness or physical disability.” (Source: City of Allentown Codified Ordinances Title Eleven Article 181) The City of Bethlehem recognizes the following protected classes, “race, color, sex, religion, ancestry, genetic information, national origin, sexual orientation, gender identity or expression, familial status, marital status, age, mental or physical disability, use of guide or support animals and/or mechanical aids.” (Source: City of Bethlehem Codified Ordinances Article 145) The City of Easton recognizes the following protected classes, “race, color, sex, religion, ancestry, national origin, sexual orientation, gender identity or expression, familial status, marital status, age, mental or physical disability, use of guide or support animals and/or mechanical aids.” (Source: City of Easton Codified Ordinances Part 1 Chapter 79)



## 7. Housing and Human Services Agencies

Agencies offering housing and human services within the County and the Cities of Allentown, Bethlehem, and Easton were interviewed in order to obtain their input and insight into potential impediments to fair housing. The following agencies participated in the information gathering through roundtable discussions, individual meetings, or through surveys:

- Northampton County staff
- City of Allentown staff
- City of Bethlehem staff
- City of Easton staff
- Northampton County Housing Authority
- City of Allentown Housing Authority
- City of Bethlehem Housing Authority
- City of Easton Housing Authority
- Everlasting Life Ministries Inc.
- Housing Association & Development Corp
- ArteFact
- The Baum School of Art
- Boys & Girls Club of Allentown
- Community Services for Children, Inc
- Grace Montessori School
- Greater Valley YMCA, Allentown Branch
- Lehigh Conference of Churches
- Lehigh Valley Children's Centers Inc
- The Literacy Center
- The Neighborhood Center
- Neighborhood Housing Services of the LV
- Valley Youth House Committee, Inc.
- Youth Education in the Arts
- Allentown Rescue Mission
- Community Action Development of Allentown
- New Bethany Ministries
- Resources for Human Development
- Salvation Army
- Family Connections
- Easton Area Neighborhood Center
- Easton Area Community Center
- Easton Boys and Girls Club
- Meals on Wheels
- Second Harvest Food Bank
- Miracle League of Northampton County
- LINCS

- BB&T Bank
- Northampton Community College
- Moravian College
- Lehigh University
- Old Allentown Preservation Association
- Lehigh Valley Workforce Investment Board, Inc.
- Communities In Schools of the Lehigh Valley

Each of these agencies provided feedback on their and their clients' experiences concerning housing-related issues in Northampton County, and the Cities of Allentown, Bethlehem, and Easton. Below is a list of key points from each of the meetings.

- Need for affordable housing
- Need for supportive services
- Need for employment opportunities
- Need for public transportation

Many agencies also provided suggestions of how to address the identified areas of inequality or discrimination in the City. Commonly suggested strategies to further fair housing in the City are included below:

- Provide more affordable housing
- Provide financial assistance to make housing more affordable
- Provide education and outreach on fair housing

## **B. Public Sector:**

The Analysis of Impediments examines public policies of the jurisdiction and the impact of those policies on fair housing choice. The local units of government control land use and development through their respective comprehensive plans, zoning regulations, subdivision regulations, and other laws and ordinances passed by the municipal governing bodies. These regulations and ordinances govern the types of housing that may be constructed, the density of housing, and the various residential uses in a community. Local officials and policies determine the community's commitment to housing goals and objectives; therefore, determining if fair housing is to be promoted or not.

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

## 1. CDBG Program

### City of Allentown

The City of Allentown is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG). The City will receive \$2,305,197 in CDBG funds for FY 2020. The City anticipates that CDBG funding levels will remain relatively level over the FY 2020-2024 Five Year Consolidated Plan period.

The City annually allocates its CDBG funds to a number of eligible projects such as: infrastructure improvement, homeownership, homeless prevention and services, housing rehabilitation, new housing construction, affordable housing navigation, recreation facility, youth program, and economic development activities. Each project must meet one of the National Objectives: Benefit to low- and moderate- income (LMI) persons; Aid in the prevention or elimination of slums or blight; or Meet a need having a particular urgency (referred to as urgent need). Many of the projects specifically focus on increasing the supply of quality affordable housing, as well as promoting fair housing choice in the City.

The City of Allentown's FY 2020-2024 Five Year Consolidated Plan identified the following strategies to address the priority needs in the City:

#	Goal Name	Category	Needs Addressed
1	Rehabilitation of Owner-Occupied Homes	Affordable Housing	Create and Preserve Affordable Housing
2	New Affordable Ownership Housing	Affordable Housing	Create and Preserve Affordable Housing Improve Access to Essential Services & Amenities
3	New Affordable Rental Housing	Affordable Housing Public Housing	Create and Preserve Affordable Housing Support Public Housing
4	Homeless Support Activities	Affordable Housing Homeless	Create and Preserve Affordable Housing Reduce Homelessness Improve Access to Essential Services & Amenities
5	Public Infrastructure Improvements	Non-Housing Community Development	Improve Mobility & Connectivity Improve Living Systems

#	Goal Name	Category	Needs Addressed
6	Public Safety Goals	Public Safety	Build a Strong, Resilient and Diversified Economy Improve Mobility & Connectivity Improve Living Systems
7	Public Facilities Improvements	Public Facilities	Improve Living Systems
8	Special Needs Goals (Non-Homeless)	Affordable Housing Non-Homeless Special Needs	Improve Access to Essential Services & Amenities Improve Mobility & Connectivity
9	Public Services	Public Services	Improve Access to Essential Services & Amenities
10	Economic Development/Job Creation	Economic Development	Build a Strong, Resilient and Diversified Economy Improve Mobility & Connectivity
11	Planning and Administration	Planning and Administration	-

1	<b>Goal Name</b>	<b>Rehabilitation of Owner-Occupied Homes</b>
	<b>Goal Description</b>	The City will annually implement activities to maintain and improve the condition of the housing stock to meet or exceed current code standards, improve energy efficiency, and comply with the City's Property Maintenance Code. Projects that will address this goal include the Hazard Elimination Program to repair or replace major housing systems that have failed and are posing a threat to the owner's health and safety.
2	<b>Goal Name</b>	<b>New Affordable Ownership Housing</b>
	<b>Goal Description</b>	The City will implement and subcontract several activities to support the creation of new affordable ownership housing: <ul style="list-style-type: none"> <li>• First-time homebuyer education and counseling;</li> <li>• Down payment Assistance; and</li> <li>• Subsidizing the development of new affordable ownership housing.</li> </ul>
3	<b>Goal Name</b>	<b>New Affordable Rental Housing</b>
	<b>Goal Description</b>	The City's support of new affordable rental housing will focus on subsidies to housing developers, including the Allentown Housing Authority. HOME funds will generally support this activity with leveraged resources including the Low-Income Housing Tax Credit Program and Federal Home Loan Bank programs.
4	<b>Goal Name</b>	<b>Homeless Support Activities</b>
	<b>Goal Description</b>	The City of Allentown will use a variety of different programs as well as funding sources to help serve the social service and housing needs of the City's homeless population.

5	<b>Goal Name</b>	<b>Public Infrastructure Improvements</b>
	<b>Goal Description</b>	The City will undertake a series of public infrastructure projects over the course of this Plan, including road reconstruction, water and sewer improvements, and lighting improvements. Given the nature of these types of improvements, the City anticipates benefitting as many as 25,000 people under this goal over the course of the Plan.
6	<b>Goal Name</b>	<b>Public Safety Goals</b>
	<b>Goal Description</b>	This goal will primarily focus on the demolition or stabilization of buildings that are posing a threat to the public's health and safety. The number of demolished properties is expected to be approximately 90 over the course of this Plan.
7	<b>Goal Name</b>	<b>Public Facilities Improvements</b>
	<b>Goal Description</b>	Public facilities are defined as those buildings or spaces that serve the residents of Allentown. Often public facilities are owned and operated by the City, in the case of parks and senior centers. However, vital public facilities are also owned and operated by nonprofit organizations. Examples might include the YMCA and the Boys and Girls Club. In order to be eligible for assistance from the CDBG program, the facility must primarily benefit low- and moderate-income residents.

### City of Bethlehem

The City of Bethlehem is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG). The City will receive \$1,354,602 in CDBG funds for FY 2020. The City anticipates that CDBG funding levels will remain relatively level over the FY 2020-2024 Five Year Consolidated Plan period.

The City annually allocates its CDBG funds to a number of eligible projects such as: park improvements, owner occupied rehab, first time home buyer outreach, fair housing legal services, rental assistance, capital improvement projects, and youth programs. Each project must meet one of the National Objectives: Benefit to low- and moderate- income (LMI) persons; Aid in the prevention or elimination of slums or blight; or Meet a need having a particular urgency (referred to as urgent need). Many of the projects specifically focus on increasing the supply of quality affordable housing, as well as promoting fair housing choice in the City.

The City of Bethlehem's FY 2020-2024 Five Year Consolidated Plan identified the following priority needs to be addressed in the City:

- 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 child care, 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

### **City of Easton and Northampton County**

Northampton County is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG) and HOME Investment Partnerships Program (HOME). The City of Easton, a previous federal CDBG entitlement community, and Northampton County entered into a cooperation agreement on 8/16/2018 that established the City of Easton as an "opt in" participant in the urban county entitlement program. The County will receive \$2,212,380 in CDBG funds for FY 2020. The County anticipates that CDBG funding levels will remain relatively level over the FY 2019-2023 Five Year Consolidated Plan period.

The County annually allocates its CDBG funds to a number of eligible projects such as: public facility/infrastructure improvements, public services, the removal of slum and blight, and housing activities. Additional projects are available to eligible low-mod income beneficiaries. Each project must meet one of the National Objectives: Benefit to low- and moderate-income (LMI) persons; Aid in the prevention or elimination of slums or blight; or Meet a need having a particular urgency (referred to as urgent need). Many of the projects specifically focus on increasing the supply of quality affordable housing, as well as promoting fair housing choice in the County.

Northampton County's FY 2019-2023 Five Year Consolidated Plan identified the following six (6) strategies to address the priority needs in the County:

**Housing Strategy Priority Need:** There is a need for decent, safe, sanitary, and affordable housing for homebuyers, homeowners, and renters.

**Goals:**

- HS-1 Housing Support – Assist low- and moderate-income households to access decent, safe, sanitary, and affordable housing for rent or for sale through housing counseling, down payment and closing cost assistance.
- HS-2 Housing Construction – Encourage the construction of new affordable housing units throughout the County for both owners and renters.
- HS-3 Housing Rehabilitation – Conserve and rehabilitate existing affordable housing units occupied by owners and renters in the County by addressing code violations, emergency repairs and handicap accessibility.

**Homeless Strategy Priority Need:** There is a need for housing for homeless persons and persons at-risk of becoming homeless.

**Goals:**

- HO-1 Housing – Support the Continuum of Care's efforts to provide emergency shelter, transitional housing, rapid rehousing, utility support, permanent supportive housing, and other permanent housing opportunities.
- HO-2 Operation/Support – Assist housing providers who operate or provide housing support services for the homeless and persons or families at-risk of becoming homeless.

**Other Special Needs Strategy Priority Need:** There is a need for housing, services, and facilities for persons with special needs.

**Goals:**

- SN-1 Housing – Support an increase in the supply of accessible, decent, safe, sanitary, and affordable housing for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs, through rehabilitation of existing buildings and new construction of housing.
- SN-2 Social Services – Support social service programs and facilities for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs.

**Community Development Strategy Priority Need:** There is a need to improve the community facilities, infrastructure, public services, and quality of life in the County.

**Goals:**

- CD-1 Community Facilities and Infrastructure – Improve the County's public facilities and infrastructure through rehabilitation, reconstruction, and new construction.
- CD-2 Public Safety and Services – Improve and enhance public safety, public services, and public programs.
- CD-3 Connectivity – Improve connectivity throughout the County and surrounding municipalities through physical, visual, transportation, and accessibility improvements.
- CD-4 Clearance/Demolition – Remove and eliminate slum and blighting conditions throughout the County.

**Economic Development Strategy Priority Need:** There is a need to encourage employment and to promote economic opportunities in the County.

**Goals:**

- ED-1 Employment – Support and encourage job creation, job retention, and job training opportunities.
- ED-2 Development – Support business and commercial growth through expansion and new development.
- ED-3 Redevelopment – Plan and promote the development, redevelopment, and revitalization of vacant commercial and industrial sites and buildings.
- ED-4 Financial Assistance – Support and encourage new economic development through local, state, and federal tax incentives and programs such as: Tax Incremental Financing (TIF); Tax Abatement (LERTA); Payment in Lieu of Taxes (Pilot); Enterprise Zones/Entitlement Communities; Section 108 Loan Guarantees; Economic Development Initiative (EDI) funds; etc.
- ED-5 Access to Transportation – Support the expansion of public transportation and access to bus and automobile service to assist the transportation needs for employment and job training opportunities.

**Administration, Planning, and Management Strategy Priority Need:** There is a need for planning, administration, management, and oversight of federal, state, and local funded programs.

**Goals:**

- AM-1 Overall Coordination – Provide program management and oversight for the successful administration of federal, state, and local funded programs, including planning services for special studies,



environmental clearance, fair housing activities, and compliance with all federal, state, and local laws and regulations.

## **2. HOME Program**

### **City of Allentown**

The City of Allentown is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community HOME Investment Partnerships Program (HOME). The City will receive \$975,569 in HOME funds for FY 2020. The City anticipates that HOME funding levels will remain relatively level over the FY 2020-2024 Five Year Consolidated Plan period.

The City annually allocates its HOME funds to eligible low-mod households for affordable housing activities such as: homeownership and new affordable housing construction.

### **City of Bethlehem**

The City of Bethlehem is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community HOME Investment Partnerships Program (HOME). The City will receive \$975,569 in HOME funds for FY 2020. The City anticipates that HOME funding levels will remain relatively level over the FY 2020-2024 Five Year Consolidated Plan period.

The City annually allocates its HOME funds to eligible low-mod households for affordable housing activities such as: owner occupied rehab, vacant property rehab, and down payment assistance.

### **Northampton County**

Northampton County is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community HOME Investment Partnerships Program (HOME). The County will receive \$647,231 in HOME funds for FY 2020. The County anticipates that HOME funding levels will remain relatively level over the FY 2020-2024 Five Year Consolidated Plan period.

The County annually allocates its HOME funds to eligible low-mod households for affordable housing activities such as: CHDO projects; owner-occupied housing rehabilitation; and affordable housing acquisition.

### **3. Emergency Solutions Grant (ESG) Funds**

#### **City of Allentown**

The City of Allentown is an entitlement community under the Emergency Solutions Grant (ESG) Program. The City will receive \$198,373 in FY 2020 ESG funds. ESG funds received by the City are awarded to homeless service provider agencies that serve the Lehigh Valley Area with projects such as: rapid rehousing; street outreach; homelessness prevention; emergency shelter; and Homeless Management Information System (HMIS).

#### **City of Bethlehem**

The City of Bethlehem is not an entitlement community under the Emergency Solutions Grant (ESG) Program. The City is part of the Eastern PA Continuum of Care, which is part of the Balance of State CoC. The Balance of State is split into five regional groups, called RHABs, each consisting of the governance structure for a CoC. The Lehigh Valley RHAB addresses issues related to homelessness in both Lehigh and Northampton Counties.

#### **Northampton County**

Northampton County is an entitlement community under the Emergency Solutions Grant (ESG) Program. The County will receive \$184,798 in FY 2020 ESG funds. ESG funds received by the County are awarded to homeless service provider agencies that serve the Lehigh Valley Area with projects such as: rapid rehousing; street outreach; homelessness prevention; emergency shelter; and Homeless Management Information System (HMIS).

### **4. Housing Opportunity for Persons with AIDS (HOPWA) Funds**

The City of Allentown is an entitlement community Housing Opportunities for Persons With AIDS (HOPWA) Program. The City will receive \$486,961 in FY 2020 HOPWA funds. HOPWA funds are assigned to the Commonwealth of Pennsylvania's Department of Community and Economic Development for activities that address the housing needs of people living with HIV/AIDS.

The Cities of Bethlehem and Easton, and Northampton County do not receive HOPWA funds.

## **5. Other Funds**

### **City of Allentown**

The City of Allentown will use the following funds to address its community development and housing needs:

- CDBG-CV
- HUD Lead Hazard Reduction Grant
- Low-Income Housing Tax Credit Program (LIHTC)
- Pennsylvania Housing Finance Agency (PFHA)
- HUD Section 202 Housing for the Elderly
- HUD Section 811 Housing for the Disabled
- HUD Public and Indian Housing
- Pennsylvania Department of Community and Economic Development (DCED)
- Federal Home Loan Bank (FHLB)
- Financial Institutions – Several local financial institutions have developed flexible underwriting criteria to encourage homeownership

### **City of Bethlehem**

The City of Bethlehem will use the following funds to address its community development and housing needs:

- CDBG-CV
- HUD Lead Hazard Reduction Grant
- Low-Income Housing Tax Credit Program (LIHTC)
- Pennsylvania Housing Finance Agency (PFHA)
- HUD Section 202 Housing for the Elderly
- HUD Section 811 Housing for the Disabled
- HUD Public and Indian Housing
- Pennsylvania Department of Community and Economic Development (DCED)
- Federal Home Loan Bank (FHLB)
- Financial Institutions – Several local financial institutions have developed flexible underwriting criteria to encourage homeownership

## **Northampton County**

Northampton County will use the following funds to address its community development and housing needs: HUD Lead Grant and PA PHARE Housing Grant.

CDBG and HOME subrecipients are encouraged to leverage additional resources (such as private, state and local funds) for projects. Subrecipients are required to submit matching fund sources in their CDBG/HOME applications. The County assists subrecipients to match federal grants with the following private, state and other funds:

- CDBG-CV
- HUD Lead Hazard Reduction Grant
- Low-Income Housing Tax Credit Program (LIHTC)
- Pennsylvania Housing Finance Agency (PFHA)
- HUD Section 202 Housing for the Elderly
- HUD Section 811 Housing for the Disabled
- HUD Public and Indian Housing
- Pennsylvania Department of Community and Economic Development (DCED)
- Federal Home Loan Bank (FHLB)
- Financial Institutions – Several local financial institutions have developed flexible underwriting criteria to encourage homeownership

## **6. Public Housing, HUD Assisted Housing, and Low Income Housing Tax Credits**

The City of Allentown has a variety of affordable housing options, including public housing managed by the Allentown Housing Authority. There are also several privately managed HUD-assisted developments throughout the City. These affordable housing developments and Housing Choice Vouchers are located across the City in areas of varying income, demographics, and housing tenure.

Housing Choice Voucher usage, Public Housing developments, and Low Income Housing Tax Credit (LIHTC) developments are distributed throughout the City. There are no distinct patterns of concentration of HUD assisted housing units. The City, as well as the Housing Authority, is aware of the concerns of concentrating low-income housing units within close proximity of each other. Both entities encourage new affordable housing developments outside of areas of existing HUD assisted housing but are also providing financial investments into the existing HUD assisted affordable housing units.

The Allentown Housing Authority receives funding through the HUD Office of Public and Indian Housing for the following housing:

**Housing for the Senior Citizens and Persons with Disabilities** - The John T. Gross Towers and Towers East buildings on W. Allen Street between 13th and 14th streets are designated for residents age 62 or older or disabled individuals of any age (federal law designates physically disabled as "elderly" for the purposes of placing applicants in public housing). In addition, the 700 Building at Seventh and Union streets, Walnut Manor at 15th and Walnut Streets and Central Park on Wahneta near Hanover Avenue are also available for senior citizens and the disabled.

**Family Housing** - Cumberland Gardens on Cumberland Street in South Allentown and Little Lehigh on Lehigh Street at Martin Luther King Blvd offer 2- to 5-bedroom apartments for families.

**The Neighborhood Strategy Area** includes 100 housing units distributed throughout the City of Allentown. These properties are available to families and senior citizens. The program includes one-, two- and three-bedroom sites at nine properties, including: 124 N. 4th St.; 343 N. 6th St.; 244 N. 6th St.; 101 N. 7th St.; 301-309 N. 7th St.; 127-129 N. 7th St.; 602-610 Chew St.; 130 Hall St.; and 449 Turner St.

The City of Bethlehem has a variety of affordable housing options, including public housing managed by the Bethlehem Housing Authority. There are also several privately managed HUD-assisted developments throughout the City. These affordable housing developments and Housing Choice Vouchers are located across the City in areas of varying income, demographics, and housing tenure.

Housing Choice Voucher usage, Public Housing developments, and Low Income Housing Tax Credit (LIHTC) developments are distributed throughout the City. There are no distinct patterns of concentration of HUD assisted housing units. The City, as well as the Housing Authority, is aware of the concerns of concentrating low-income housing units within close proximity of each other. Both entities encourage new affordable housing developments outside of areas of existing HUD assisted housing but are also providing financial investments into the existing HUD assisted affordable housing units.

The Bethlehem Housing Authority receives funding through the HUD Office of Public and Indian Housing for the following housing:

**AMP #1** – Pembroke, 1429 Fritz Drive, 196 Family and specially designed handicap units, Built 1941, Remodeled 1995; Fairmount Homes, 1429 Fritz

Drive, 120 units including specially designed handicap units, Built 1953, Remodeled 1997; and Pfeifle Homes, 1429 Fritz Drive, 50 units, Built 1962, Renovated in 2005-2007.

**AMP #2** – Marvine, 1429 Fritz Drive, 389 units including specially modified handicap units, Built 1953, Remodeled 1985 and currently undergoing renovations.

**AMP #3** – Lynfield Homes, 1889 Lynfield Drive, 200 units including special handicap units, Built 1985; and Parkridge, 1926 Brookside Drive, 100 units including special handicap units, Built 1992.

**AMP #4** – Litzenberger House, 225 E. Fourth Street, 101 units, Built 1967; Bodder, 645 Leibert Street, 65 units, Built 1970; Bartholomew, 512 Elm Street, 65 units, Built 1970; and Monocacy Tower, 645 Main Street, 148 Units Built 1973, Remodeled 1989.

**AMP #5** – Bayard Homes, 1429 Fritz Drive, 20 Units, new construction, four designed for special needs.

The City of Easton has a variety of affordable housing options, including public housing managed by the Easton Housing Authority. There are also several privately managed HUD-assisted developments throughout the City. These affordable housing developments and Housing Choice Vouchers are located across the City in areas of varying income, demographics, and housing tenure.

Housing Choice Voucher usage, Public Housing developments, and Low Income Housing Tax Credit (LIHTC) developments are distributed throughout the City. There are no distinct patterns of concentration of HUD assisted housing units. The City, as well as the Housing Authority, is aware of the concerns of concentrating low-income housing units within close proximity of each other. Both entities encourage new affordable housing developments outside of areas of existing HUD assisted housing but are also providing financial investments into the existing HUD assisted affordable housing units.

The Easton Housing Authority receives funding through the HUD Office of Public and Indian Housing for the following housing:

**Harlan House Senior Associates**, 221 S 4th St, Easton, Pennsylvania

**Jefferson St - N Union St**, 32 N Union St, Easton, Pennsylvania

**Bushkill House**, 66 N Locust St, Easton, Pennsylvania

**Delaware Terrace**, 948 Glendon Ave, Easton, Pennsylvania

**Neston Heights**, 205 E Kleinhans St, Easton, Pennsylvania

**Neston Heights Senior Project**, 137 E Kleinhans St, Easton, Pennsylvania

**Walter House**, 205 Michael Koury Place, Easton, Pennsylvania

**St. Joseph Street**, 202 E. St. Joseph Street, Easton, Pennsylvania

The Northampton County Housing Authority receives funding through the HUD Office of Public and Indian Housing for the following housing:

**Oliver Border House** - 75 units, 15 South Wood Street, Nazareth, PA 18064

**Howard Jones Manor** -31 units, 129 Mill Street, Bath, PA 18014

The Public Housing and Housing Choice Vouchers Waiting Lists are closed for all of the communities. The most immediate needs of the households on the waiting list include: decent, safe, sanitary and affordable housing; supportive services such as employment training; access to transportation for commuting to work, shopping, and medical services; and living wage job opportunities. The waiting lists are disproportionately represented by extremely low- and very low-income households.

### **Low Income Housing Tax Credit (LIHTC) Housing**

The following is a list of Low Income Housing Tax Credit housing in the Cities of Allentown, Bethlehem, and Easton, and Northampton County.

### **LIHTC PROJECTS IN ALLENTOWN, BETHLEHEM, EASTON, AND COUNTY OF NORTHAMPTON**

HUD ID Number	Project Name	Project Address	Project City	Project State	Project ZIP Code	Total Number of Units	Total Low-Income Units
PAA19930005	10TH ST PROJECT	34 N TENTH ST	Allentown	Pennsylvania	18101	23	23
PAA19880070	137 S EIGHTH ST	137 S EIGHTH ST	Allentown	Pennsylvania	18101	3	3
PAA19890205	240 E HAMILTON ST	240 E HAMILTON ST	Allentown	Pennsylvania	18109	2	2
PAA19880190	314 N CHURCH ST	314 N CHURCH ST	Allentown	Pennsylvania	18102	8	7
PAA19880205	327 N LUMBER ST	327 N LUMBER ST	Allentown	Pennsylvania	18102	1	1
PAA19920050	627 HAMILTON APTS	627 HAMILTON ST	Allentown	Pennsylvania	18101	30	30

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PAA19880360	715-723 E HAMILTON ST	715 E HAMILTON ST	Allentown	Pennsylvania	18109	8	8
PAA19880400	833 W PINE ST	833 W PINE ST	Allentown	Pennsylvania	18102	3	3
PAA19890460	846 W WALNUT ST	846 W WALNUT ST	Allentown	Pennsylvania	18102	2	2
PAA19890465	848 W WALNUT ST	848 W WALNUT ST	Allentown	Pennsylvania	18102	2	2
PAA19880420	964 JACKSON ST	964 JACKSON ST	Allentown	Pennsylvania	18102	4	4
PAA00000012	ALLENTOWN NATIONAL BANK	15 N SEVENTH ST	Allentown	Pennsylvania	18101	63	-
PAA19890485	ALLENTOWN TOWNE HOUSE	1827 W WALNUT ST	Allentown	Pennsylvania	18104	160	159
PAA00000032	CEDAR VILLAGE APTS	4234 DORNEY PARK RD	Allentown	Pennsylvania	18104	50	-
PAA19910360	CONSTITUTION DR APTS	1012 CONSTITUTION DR	Allentown	Pennsylvania	18103	3	3
PAA00000043	CUMBERLAND GARDENS	501 E CUMBERLAND ST	Allentown	Pennsylvania	18103	70	-
PAA20142004	CUMBERLAND GARDENS PHASE II	SCATTERED SITES	Allentown	Pennsylvania	18103	70	70
PAA20151002	CUMBERLAND GARDENS PHASE III	SCATTERED SITES	Allentown	Pennsylvania	18103	56	56
PAA19910410	GORDON STREET APTS	-	Allentown	Pennsylvania	-	20	20
PAA00000093	GREYSTONE APTS	106 S SEVENTH ST	Allentown	Pennsylvania	18101	24	-
PAA00000094	HAMILTON ST (627)	627 HAMILTON ST	Allentown	Pennsylvania	18101	30	-
PAA20080080	HART PHASE 2A	-	Allentown	Pennsylvania	-	60	60
PAA00000098	HART PHASE 2B	N BRADFORD E	Allentown	Pennsylvania	-	50	-
PAA20070070	HART RENTAL PHASE I	E LINDEN ST HANOVER AVE	Allentown	Pennsylvania	-	80	80
PAA20070075	HART RENTAL PHASE II	445 HANOVER AVE	Allentown	Pennsylvania	18109	79	79
PAA19900360	MARKET STREET APTS	345 MARKET ST	Allentown	Pennsylvania	18103	7	7
PAA19990155	MOUNTAINVILLE MANOR	1920 S FIFTH ST	Allentown	Pennsylvania	18103	20	20
PAA19930210	N 5TH ST APTS	950 N FIFTH ST	Allentown	Pennsylvania	18102	8	8
PAA19890305	NORTH HALL ST	422 1/2 N HALL ST	Allentown	Pennsylvania	18102	1	1
PAA19910535	PINE STREET ASSOC	930 W PINE ST	Allentown	Pennsylvania	18102	1	1
PAA19870395	S 7TH ST APTS	1112 S SEVENTH ST	Allentown	Pennsylvania	18103	5	5
PAA19920260	SHERMAN STREET APTS	616 SHERMAN ST	Allentown	Pennsylvania	18109	3	3



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PAA00000256	TENTH STREET	3435-37 39-41 N TENTH ST	Allentown	Pennsylvania	18101	23	-
PAA19900420	TURNER ST APTS	146 N SEVENTH ST	Allentown	Pennsylvania	18101	12	12
PAA19880665	UNION STREET APTS	259 E UNION ST	Allentown	Pennsylvania	18109	4	4
PAA19870435	WHITE HALL APTS	927 S SEVENTH ST	Allentown	Pennsylvania	18103	2	2
PAA19910650	WOODWARD STREET	641 S WOODWARD ST	Allentown	Pennsylvania	18103	7	7
PAA19890095	1538 E EIGHTH ST APTS	1538 E EIGHTH ST	Bethlehem	PA	18015	4	4
PAA19870145	43-55 W SPRUCE ST	43 W SPRUCE ST	Bethlehem	PA	18018	7	7
PAA19900140	536-38 BROADWAY ST	536 BRDWAY	Bethlehem	PA	18015	6	6
PAA19890470	941 E FOURTH ST	941 E FOURTH ST	Bethlehem	PA	18015	2	2
PAA19870255	ATLANTIC APTS	729 E SEVENTH ST	Bethlehem	PA	18015	6	6
PAA19910320	ATLANTIC STREET APTS	825 ATLANTIC ST	Bethlehem	PA	18015	22	22
PAA20060015	BETHLEHEM TOWNHOMES II	1191 LIVINGSTON ST	Bethlehem	PA	18017	127	127
PAA20080020	BETHLEHEM YMCA	430 E BRD ST	Bethlehem	PA	18018	35	33
PAA19870275	BROAD & HIGH STREETS	604 HIGH ST	Bethlehem	PA	18018	12	12
PAA19870280	CHEROKEE APTS	501 CHEROKEE ST	Bethlehem	PA	18015	5	5
PAA19910385	E FOURTH ST APTS	1136 E FOURTH ST	Bethlehem	PA	18015	8	8
PAA19970060	EATON AVENUE APTS	1102 EATON AVE	Bethlehem	PA	18018	50	50
PAA20030065	FORTE APTS	1345 E FIFTH ST	Bethlehem	PA	18015	10	10
PAA20070055	FRED B ROONEY BUILDING	4 E FOURTH ST	Bethlehem	PA	18015	150	150
PAA20030070	GOEPP STREET APTS	735 E GOEPP ST	Bethlehem	PA	18018	54	54
PAA20020065	LEXIES DREAM	1609 SCHOENERSVILLE RD	Bethlehem	PA	18018	15	15
PAA19990153	MORAVIAN HOUSE III	133 W UNION BLVD	Bethlehem	PA	18018	50	50
PAA20020110	PARKVIEW AT BETHLEHEM	1241 CLUB AVE	Bethlehem	PA	18018	115	115
PAA19930235	PENNSYLVANIA AVE APTS	1442 PENNSYLVANIA AVE	Bethlehem	PA	18018	14	14
PAA20020125	SCHOENERSVILLE APTS	1547 SCHOENERSVILLE RD	Bethlehem	PA	18018	40	40
PAA20142019	SOUTH SIDE LOFTS	419-429 HAYES ST	BETHLEHEM	PA	18015-1907	46	46
PAA20130016	VHDC AP54	SCATTERED SITES	BETHLEHEM	PA	18015-0000	51	51

PAA19870415	W UNION BLVD	42 W UNION BLVD	Bethlehem	PA	18018	10	10
PAA19930060	BISHOP APTS	527 NAMPTON ST	Easton	PA	18042	20	20
PAA19960035	BUTLER STREET APTS	1198 BUTLER ST	Easton	PA	18042	9	9
PAA00000028	CANAL PARK APTS	602 CANAL PARK	Easton	PA	18042	27	-
PAA00000052	DELAWARE TERRACE SENIOR	-	Easton	PA	18042	40	-
PAA00000053	DELAWARE TERRACE-FAMILY RENTAL	210 JONES HOUSTON WAY	Easton	PA	18042	56	-
PAA19900255	FERRY STREET APTS	600 FERRY ST	Easton	PA	18042	10	10
PAA19990095	GRANDVIEW APTS	100 GRANDVIEW DR	Easton	PA	18045	57	57
PAA19990097	GRANDVIEW II	200 GRANDVIEW DR	Easton	PA	18045	60	60
PAA20020050	HARLAN HOUSE ELDERLY HOUSING	221 S FOURTH ST	Easton	PA	18042	100	100
PAA20010095	KNOX AVENUE SENIOR APTS	1101 KNOX AVE	Easton	PA	18040	48	48
PAA19930285	S THIRD ST APTS	100 S THIRD ST	Easton	PA	18042	22	22
PAA00000241	SOUTH THIRD STREET APTS	104 S THIRD ST	Easton	PA	18042	22	-
PAA20040170	WILSON MANOR APTS	535 AVONA AVE	Easton	PA	18042	60	60

Source: <https://lihtc.huduser.gov/>

There are seventy-three (73) LIHTC projects with 1,905 units of affordable rental housing in the County; thirty-seven (37) in Allentown; twenty-three (23) in Bethlehem, and thirteen (13) in Easton.

## Multifamily Housing

The following is a list of HUD Multifamily housing in the Cities of Allentown, Bethlehem, and Easton, and Northampton County.

HUD ID	PROPERTY NAME	ADDRESS	CITY	STATE	ZIP	TOTAL ASSISTED UNITS	TOTAL UNITS	ASSISTANCE
800215959	PARK VIEW AT BETHLEHEM	1241 Club Ave	Bethlehem	PA	18018	0	115	Insured-Unsubsidized
800234267	FCD-Saber-Slate Belt	701 Slate Belt Boulevard	Bangor	PA	18013	0	0	Insured-Unsubsidized

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800236815	Saucon Valley Manor Senior Living	1050 Main Street	Hellertown	PA	18055	0	169	Insured-Unsubsidized
800239511	Country Meadows of Bethlehem	4035 Green Pond Road	Bethlehem	PA	18020	0	297	Insured-Unsubsidized
800245614	New Eastwood Healthcare & Rehabilitation	2125 Fairview Avenue	Easton	PA	18042	0	97	Insured-Unsubsidized
800247546	The Gardens at Easton	498 Washington Street	Easton	PA	18042	0	0	Insured-Unsubsidized
800247547	The Gardens for Memory Care at Easton	500 Washington Street	Easton	PA	18042	0	0	Insured-Unsubsidized
800003814	B'NAI B'RITH HOUSE	1616 LIBERTY ST	ALLENTOWN	PA	18102	270	271	Insured-Subsidized
800018181	ALLENTOWN HOUSE	1827 WALNUT STREET	ALLENTOWN	PA	18104	159	159	Subsidized, No HUD Financing
800018182	ALLENTOWN NSA	1339 Allen Street	ALLENTOWN	PA	18102	99	99	Subsidized, No HUD Financing
800018191	ANTONIAN TOWERS	2405 Hillside AVE	EASTON	PA	18042	50	50	Insured-Subsidized
800018209	BANGOR ELDERLY HOUSING	101 MURRAY ST	BANGOR	PA	18013	100	100	Subsidized, No HUD Financing
800018238	BETHLEHEM TOWNHOUSE II	1191 LIVINGSTON ST	BETHLEHEM	PA	18017	113	127	Insured-Subsidized
800018239	BETHLEHEM TOWNHOUSES I	1059 C LIVINGSTON ST	BETHLEHEM	PA	18017	73	109	Subsidized - Previously Insured
800018384	EASTON SENIOR CITIZEN HSG	127 S 4TH ST	EASTON	PA	18042	97	97	Subsidized, No HUD Financing
800018404	EPISCOPAL APTS OF THE SLATE BELT	684 AMERICAN BANGOR RD	BANGOR	PA	18013	93	94	Insured-Subsidized
800018405	EPISCOPAL HOUSE	1440 WALNUT ST	ALLENTOWN	PA	18102	15	210	Subsidized - Previously 202/811

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800018529	HOLY FAMILY APARTMENTS	334 13TH AVENUE	BETHLEHEM	PA	18018	50	50	Insured-Subsidized
800018615	LITTLE LEHIGH MANOR	824 JACKSON STREET	ALLENTOWN	PA	18102	110	111	Subsidized, No HUD Financing
800018626	LUTHERAN MANOR	2085 WESTGATE DR	BETHLEHEM	PA	18018	195	196	Subsidized - Previously Insured
800018681	MORAVIAN HOUSE I	737 MAIN ST	BETHLEHEM	PA	18018	100	162	Subsidized - Previously Insured
800018682	MORAVIAN HOUSE II	701 MAIN ST	BETHLEHEM	PA	18018	106	106	Subsidized - Previously 202/811
800018741	SOUTH SIXTH STREET	129 SOUTH SIXTH STREET	ALLENTOWN	PA	18101	49	49	Subsidized, No HUD Financing
800018781	PHOEBE APTS	1901 S LINDEN ST	ALLENTOWN	PA	18104	26	132	202/811
800018841	SAUCON MANOR	650 Northampton ST	HELLERTOWN	PA	18055	50	51	Subsidized - Previously Insured
800018842	SCATTERED SITES	1339 ALLEN STREET	ALLENTOWN	PA	18102	25	25	Subsidized, No HUD Financing
800018868	SHILOH MANOR	223 BROTHER THOMAS BRIGHT AVE	EASTON	PA	18042	58	58	202/811
800018879	SOUTH SIXTH ST REHAB I	102-124 South Sixth Street	ALLENTOWN	PA	18101	36	36	Subsidized, No HUD Financing
800018881	FRED B ROONEY aka BETHLEHEM DEVELOPERS	4 E FOURTH ST	BETHLEHEM	PA	18015	150	150	Insured-Subsidized
800018882	SPITALE ELDERLY APTS.	607 NORTHAMPTON ST	EASTON	PA	18042	12	12	Subsidized, No HUD Financing
800018910	STEP-BY-STEP	11 WEST 4th ST	BETHLEHEM	PA	18015	5	5	202/811
800018935	HAMPTON HOUSE	1802 LINCOLN AVE	NORTHAMPTON	PA	18067	100	101	Insured-Subsidized

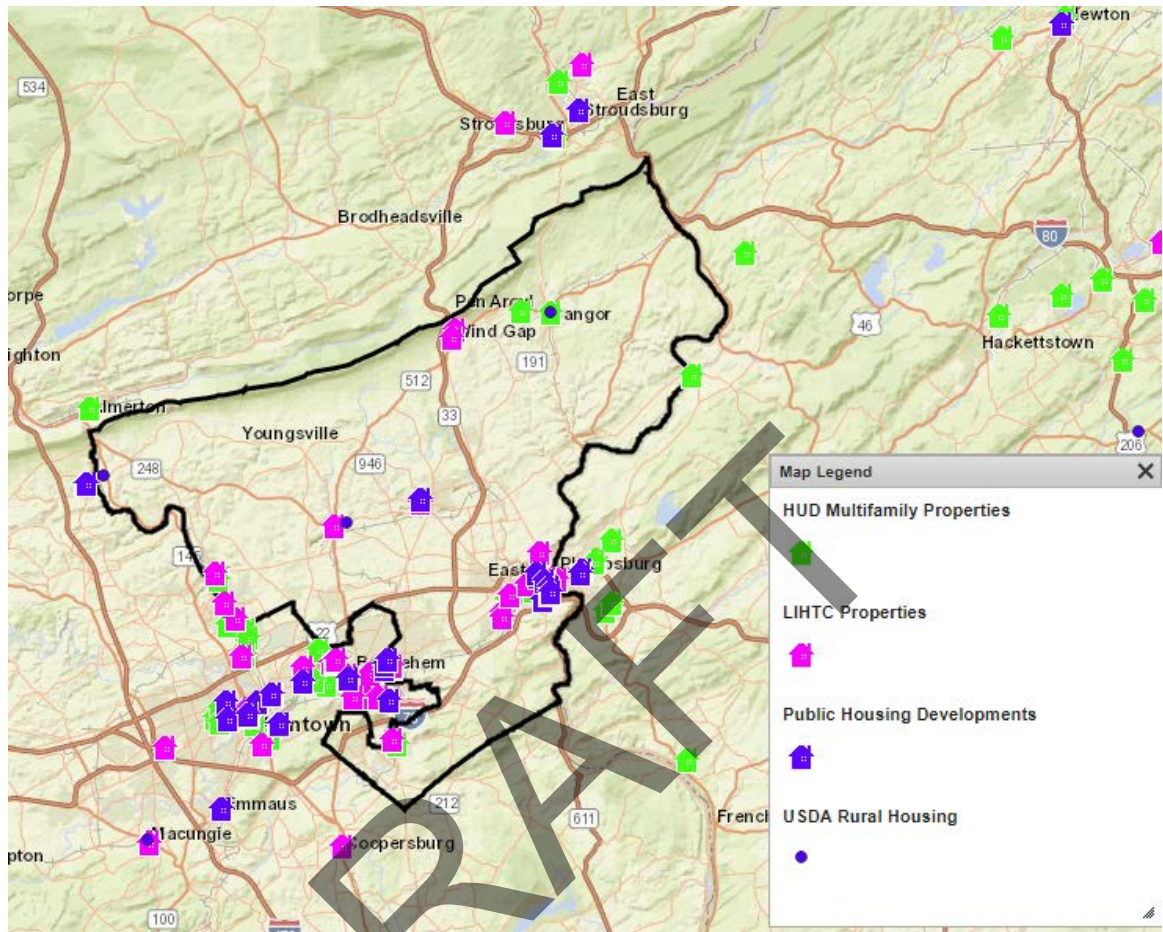
800019015	WEST THIRD STREET APTS.	14 -16-18 W THIRD ST	BETHLEHEM	PA	18015	8	8	Subsidized, No HUD Financing
800019040	WOODLAND MANOR	1918 GATEWOOD LN	BETHLEHEM	PA	18018	70	70	Subsidized, No HUD Financing
800212955	AHEPA LEHIGH CHAPTER 60 APTS.	1823-1849 Chapel Avenue	ALLENTOWN	PA	18103	48	48	202/811
800213044	ALLENTOWN, PENNSYLVANIA SUPPOR	903-917 & 919-935 So. 5th Street	ALLENTOWN	PA	18103	18	18	202/811
800217852	LIVINGSTON MANOR	1054 Livingston St	Bethlehem	PA	18017	42	42	202/811
800221320	MORAVIAN HOUSE IV	70 W North St	Bethlehem	PA	18018	8	8	202/811
800244571	OVERLOOK 1A	445 Hanover Ave Ste 105	Allentown	PA	18109	80	80	Subsidized, No HUD Financing
800244572	OVERLOOK 2A	445 Hanover Ave Ste 105	Allentown	PA	18109	60	60	Subsidized, No HUD Financing

Source: [https://www.hud.gov/program\\_offices/housing/mfh/presrv/mfhpreservation](https://www.hud.gov/program_offices/housing/mfh/presrv/mfhpreservation)

There are forty (40) active HUD Multifamily Housing projects with 3,572 units of affordable rental housing in the area; thirteen (13) in Allentown; fourteen (14) in Bethlehem, and seven (7) in Easton.

Housing Choice Voucher usage, Public Housing developments, and Low Income Housing Tax Credit (LIHTC) developments are distributed throughout the area but mainly concentrated in the urban areas. The communities, as well as the Housing Authorities, are aware of the concerns of concentrating low-income housing units within close proximity of each other. Both entities encourage new affordable housing developments outside of areas of existing HUD assisted housing but are also providing financial investments into the existing HUD assisted affordable housing units. The partnership should look for a regional approach to developing future affordable housing, as well as deconcentrating existing lower-income housing throughout the area to encourage fair housing choice.

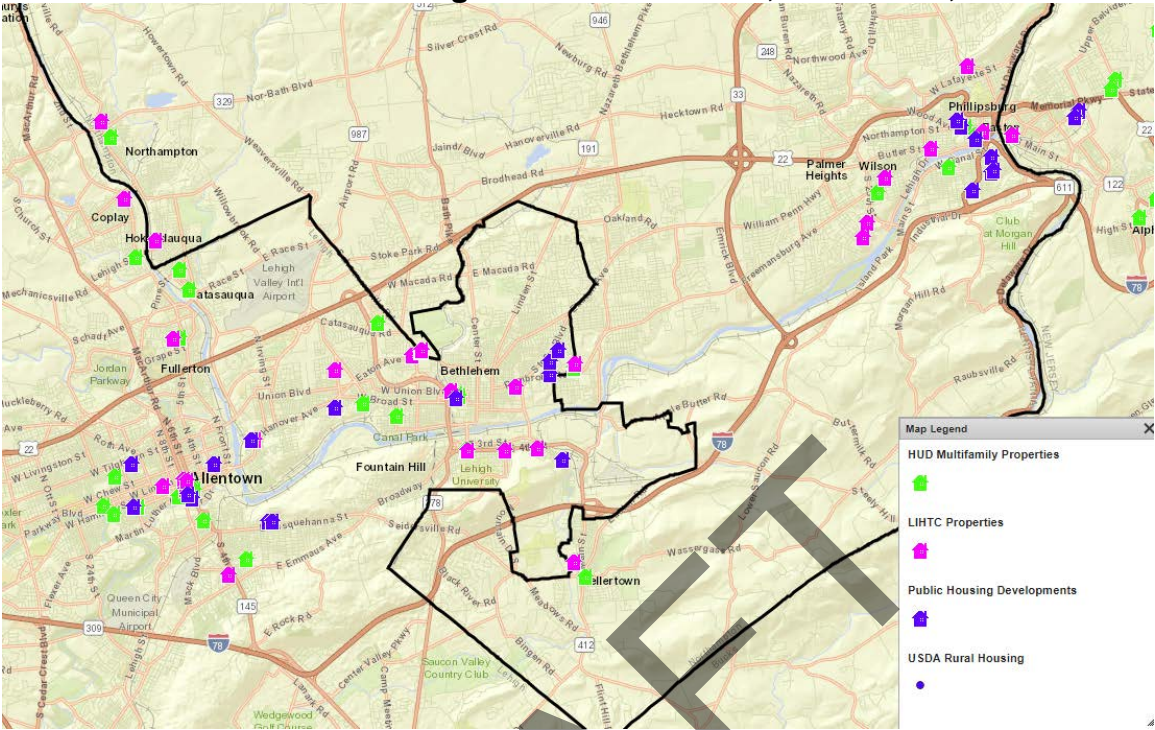
## Location of Assisted Housing Northampton County



Source: HUD CPD Maps

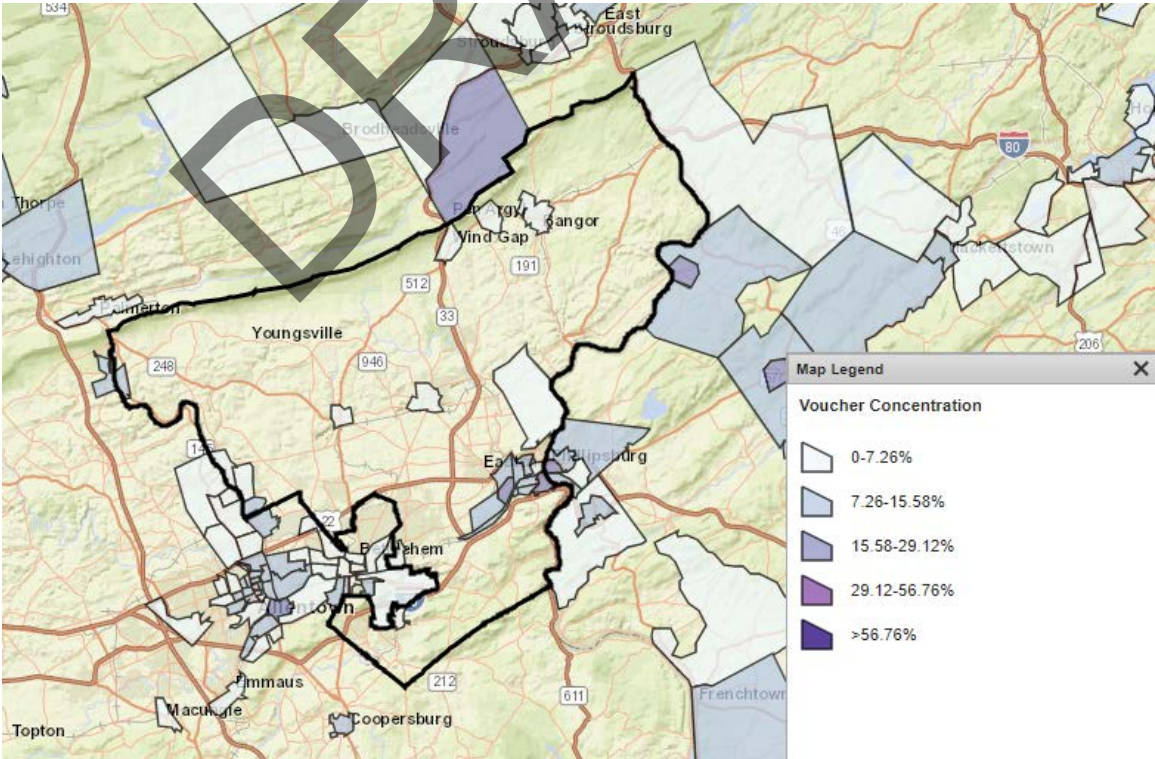


Location of Assisted Housing Cities of Allentown, Bethlehem, and Easton



Source: HUD CPD Maps

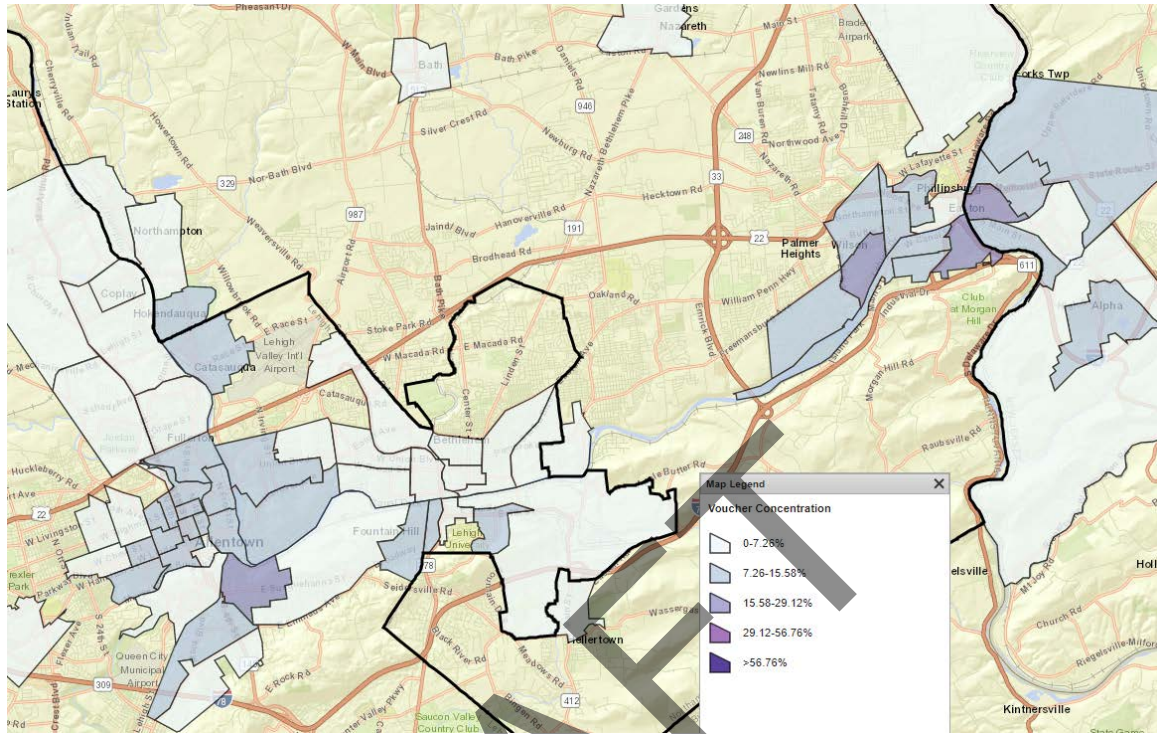
Voucher Concentration Northampton County



Source: HUD CPD Maps



## Voucher Concentration Cities of Allentown, Bethlehem, and Easton



Source: HUD CPD Maps

## 7. Planning, Zoning, and Building Codes

Zoning Ordinances can be overtly discriminatory by limiting development or occupancy of housing based on a resident's race, sex, religion, national origin, color, disability, or familial status. Additionally, discrimination, albeit unintentional, can occur when a facially neutral ordinance has a disparate impact on a protected class. An example of this has been litigated over limitations in the definition of a family as 4 or fewer unrelated adults. A ceiling of four or fewer unrelated individuals in a household may be considered discriminatory if it can be proven that this limitation disproportionately affects minorities, large families with children, or individuals with disabilities. The Federal Courts have ruled that four to six persons with a disability living together in a single-family residence, should be considered a "family" and thereby be permitted to live together as a family in any zoning district that permits residential uses. The Fair Housing Act also makes it unlawful to refuse to make reasonable accommodations, or changes to rules, policies practices, or services, when such accommodations are necessary to allow a person with a disability an equal opportunity to use or enjoy a dwelling. Under the Fair Housing Act, an accommodation is considered reasonable if it does not impose an undue financial or administrative burden and it does not fundamentally alter the zoning ordinance.



The Lehigh Valley Planning Commission (LVPC) was formed to create a comprehensive plan to guide orderly growth in Lehigh and Northampton counties. The LVPC offers community planning services to the Lehigh Valley's 62 municipalities such as drafting zoning, subdivision and land development ordinances. The LVPC has model zoning ordinances and is available for technical assistance to assist communities take actions 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.

In addition to zoning ordinance update, it is recommended that the communities adopt a commitment to affirmatively further fair housing through its land use regulations and public policies, such as zoning, to promote fair housing choice for all residents in the Lehigh Valley. The statement should include mention of the Fair Housing Act of 1968, the Americans with Disabilities Act of 1990, as well as identification of the federal protected classes.

All of the communities should consider adopting a written reasonable accommodation policy that allows for changes in rules and procedures to afford persons with disabilities equal opportunity to housing, as required by the Fair Housing Act. A reasonable accommodation policy would allow the municipality flexibility in the application of zoning and land use, as well as providing housing developers guidance in requesting reasonable accommodations.

### ***Commonwealth of Pennsylvania Building Codes***

The UCC Administration and Enforcement regulation has adopted the following codes for use throughout the Commonwealth of Pennsylvania, effective 10/1/2018:

- International Building Code 2015 (code for all buildings and structures not regulated by the International Residential Code 2015:
  - Chapter 1 is not adopted (most of its requirements are incorporated in Chapter 403 of the UCC regulation)
  - Chapter 27 (Electrical) requires that all electrical components, equipment and systems in buildings and structures covered by the IBC comply with the requirements of NFPA 70-2014, National Electric Code.
- Chapter 11, International Building Code 2018 Accessibility Requirements

- International Energy Conservation Code 2015
- International Existing Building Code 2015
- International Fire Code 2015
  - Adopted only to the extent referenced in Chapter 35 of the International Building Code 2015.
- International Fuel Gas Code 2015
  - Any LPG requirements are superseded by the requirements of Pennsylvania’s Propane and Liquefied Petroleum Gas Act (and regulations)
- International Mechanical Code 2015
- International Performance Code for Buildings and Facilities 2009 (provides alternative compliance approach)
- International Plumbing Code 2015
- International Residential Code 2015 (code for one- and two-family dwellings no more than 3 stories in height)
- International Wildland-Urban Interface Code 2015 (supplementary requirements that may be used to mitigate fire- and life-safety hazards in unique wildland areas)

The International Building Code (new construction) and the International Existing Building Code (renovation/rehabilitation) are model codes and are in compliance with the federal laws and regulations governing fair housing and accessibility.

Building inspections are administered by the local municipalities. The Building Codes are enforced through plan review and inspections. Interviews with inspection staff indicated that developers and contractors are abiding by the state and federal accessibility regulations and there does not appear to be any blatant violations.

### ***Accessibility Regulations***

HUD encourages its grantees to incorporate “visitability” principles into their designs. Housing that is “visitable” includes the most basic level of

accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor. “Visitable” homes have at least one accessible means of egress/ingress for each unit, and all interior and bathroom doorways have at least a 32-inch clear opening. As a minimum, HUD grantees are required to abide by all federal laws governing accessibility for disabled persons. The entitlement communities appear to be in full compliance with the HUD visitability standards.

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

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

The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments. Specifically, ADA gives HUD jurisdiction over housing discrimination against persons with disabilities.

The Fair Housing Act prohibits discrimination in the sale or rental of housing. It also requires that landlords must make reasonable modifications dwellings and common use areas to accommodate persons who have a disability. For all new residential buildings of four or more units built after March 13, 1991: public and common areas must be accessible to persons with disabilities; doors and hallways must be wide enough for wheelchairs; all housing units must have accessible routes into and through the unit; there must be accessible light switches, outlets, thermostats; bathroom walls must be reinforced to allow for the installation of grab bars; and kitchens and baths must be accessible so they can be used by persons in wheelchairs.

## **8. Limited English Proficiency (LEP) Persons**

Section 601 of Title VI the Civil Rights Act of 1964 is the federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs or activities that receive federal financial assistance. One type of national origin discrimination is based on a person’s inability to speak, read, write, or understand English. In certain situations, failure to ensure that persons who are LEP can effectively participate in, or benefit from, federally assisted programs may violate the Civil Rights Act.

According to the 2013-2017 American Community Survey for the City of Allentown, 45.3% of (or 50,264) residents speak a language other than English at home. Also, 19.4% of (or 21,483) residents report that they speak English less than “very well.” The following languages are spoken at home:

English	54.7%
Spanish	39.1%
Other Indo-European languages	2.0%
Asian and Pacific Island languages	1.1%
Other languages	3.1%

The two largest non-English speaking populations in the City are Spanish and Other Languages speakers.

According to the 2013-2017 American Community Survey for the City of Bethlehem, 25.5% of (or 18,042) residents speak a language other than English at home. Also, 9.4% of (or 6,693) residents report that they speak English less than “very well.” The following languages are spoken at home:

English	74.5%
Spanish	19.4%
Other Indo-European languages	3.3%
Asian and Pacific Island languages	2.0%
Other languages	0.8%

The two largest non-English speaking populations in the City are Spanish and Other Indo-European Languages speakers.

According to the 2013-2017 American Community Survey for the City of Easton, 20.1% of (or 5,168) residents speak a language other than English at home. Also, 8.0% of (or 2,059) residents report that they speak English less than “very well.” The following languages are spoken at home:

English	79.9%
Spanish	14.8%
Other Indo-European languages	3.4%
Asian and Pacific Island languages	1.4%
Other languages	0.5%

The two largest non-English speaking populations in the City are Spanish and Other Indo-European Languages speakers.

According to the 2013-2017 American Community Survey for Northampton County, 13.0% of (or 37,308) residents speak a language other than English

at home. Also, 4.6% of (or 13,212) residents report that they speak English less than “very well.” The following languages are spoken at home:

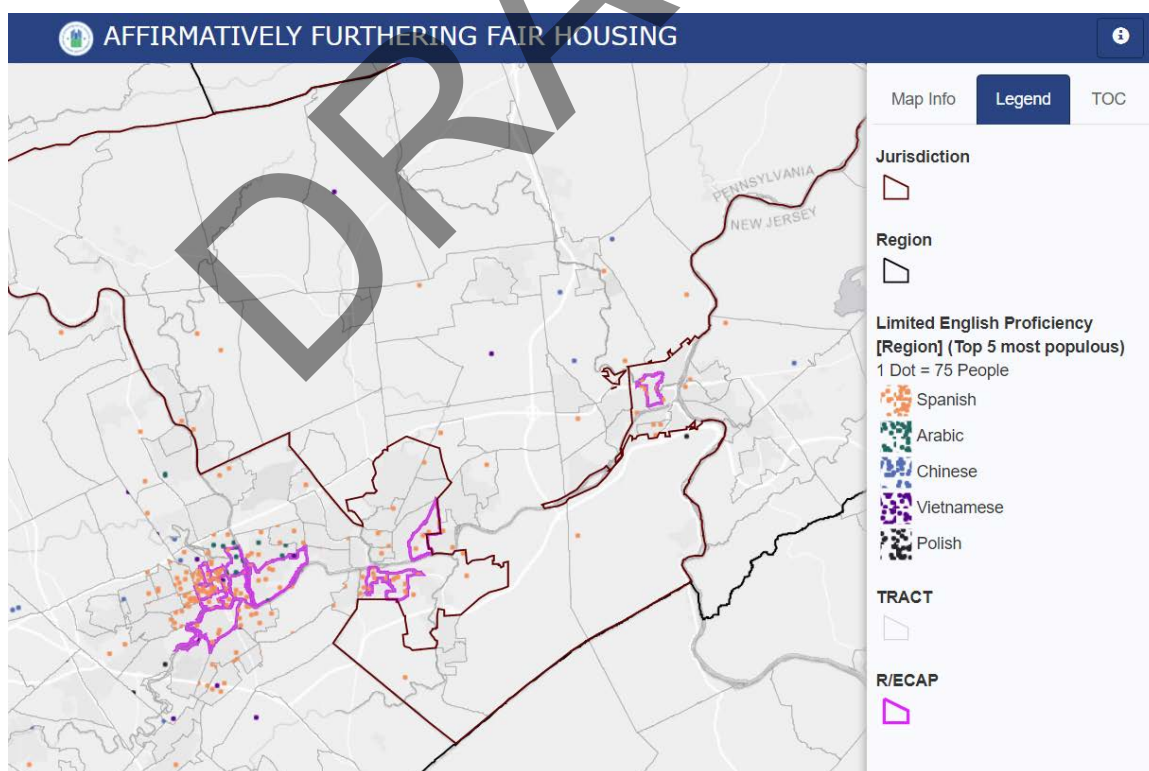
English	87.0%
Spanish	7.7%
Other Indo-European languages	3.6%
Asian and Pacific Island languages	1.3%
Other languages	0.5%

The two largest non-English speaking populations in the County are Spanish and Other Indo-European Languages speakers.

All of the communities have significant Spanish speaking populations, including limited English proficiency residents. According to federal guidance, written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 individuals, whichever is less, is required. All of the participant communities should have all vital documents translated to Spanish.

The following map highlights areas of LEP populations.

### Limited English Proficiency (LEP)



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

## 9. Four Factor Analysis

### City of Allentown

The City as a CDBG entitlement community is required to develop a plan for persons of different national origins that cannot speak, read, write, or understand English to ensure that LEP persons have meaningful access to CDBG funded programs and services, as well as all City programs and services. The City has an existing Language Access Plan (LAP) that covers City activities, as well as subrecipient activities. The following Four Factor Analysis was completed by the City in its LAP:

**1. Number or Proportion of LEP persons in the population to be served.** The 2011-2015 American Community Survey 5-Year Estimates (ACS) state that the population of the City of Allentown is 121,442; five percent of this population is 6,072. Based on the ACS, there is no single language group that meets the five percent requirement. Spanish speakers equal 40% of the population. However, because the City's programs are carried out at the local level by its sub-recipients, the City also analyzed the municipalities individually to assess which languages are present in percentages of five percent or higher in individual communities. It was found that Indo-European is at 1%, Asian/Islander at 3% and other at 3%.

**2. Frequency with which LEP persons come into contact with the program activity or service.** Because the City funds grantees to carry out programs directly with their communities, the City itself does not have direct contact with residents and LEP persons benefiting from its funding. The City, however, has citizen participation requirements and will make notices, the Consolidated Plan, Annual Action Plans, and other required documents available in Spanish given that the Spanish language group is the largest across the Commonwealth. The City's subrecipients are primarily responsible for the direct relationships with the residents of the City and so this Language Access Plan includes guidelines for sub-recipients and for the City's enforcement of sub-recipient compliance.

**3. Importance of the service, information, program, and/or activity.** The projects proposed by the City's grantees often offer direct assistance to project area beneficiaries related to housing and other services. Therefore, the City will require that the Four-Factor Analyses completed by its sub-recipients to consider the nature of the activity or service that the sub-recipient plans to undertake. This will ensure that programs that come into contact with limited English proficiency individuals include resources that allow these individuals equal access to services.

**4. Resources, financial and human, available to the recipient.** Language assistance entails providing both written translations and oral

interpretations as determined by the Four-Factor Analysis. When it is determined that language access is required, specific steps need to be outlined to demonstrate that the access is indeed being provided. The City's plan for itself, and its expectation of its subrecipients, is that every significant touchpoint with LEPs will have options for translation and interpretation services as required by the guidelines. The City already ensures that all vital documents are translated into Spanish to assist the residents of the City who may have limited English proficiency. These documents are placed on the City's website at <http://the City.pa.gov/library/Documentos en Español>. The City website also can translate a document in other languages by opening the document and choosing the flag of the country of the language needed from the top of the webpage. To further aid its sub-recipients in meeting the language access requirements, the City has translated the templates listed in Section VI into the top four languages represented at percentages of five percent or higher across the Commonwealth's municipalities German/West German (Pennsylvania Dutch), Spanish, Chinese, and Korean. These efforts are designed to ensure that sub-recipients have access to the resources needed for their communities. The City also provides training and technical assistance support to its sub-recipients who have primary contact with the Commonwealth's residents and carry their own responsibilities for ensuring compliance with language access requirements. Additionally, the City has a Language Line Solutions Hotline Number, which is 1-800-523-1786, to provide assistance to LEP persons.

### **City of Bethlehem**

The City as a CDBG entitlement community is required to develop a plan for persons of different national origins that cannot speak, read, write, or understand English to ensure that LEP persons have meaningful access to CDBG funded programs and services, as well as all City programs and services. The City has an existing Language Access Plan (LAP) that covers City activities, as well as subrecipient activities. The following Four Factor Analysis was completed by the City in its LAP:

**1. Number or Proportion of LEP persons in the population to be served.** Bethlehem obtained information from the U.S. Census Bureau's American Factfinder website as recommended by HUD in order to gather data about the jurisdiction's overall population, as well as the population of LEP persons within the jurisdiction and the primary languages spoken. This data indicated the following:

- Total population 5 years and over is 70,842
- Total LEP population 5 years and over is 6,616
- Spanish speaking LEP population 5 years and over is 5,222

- Other Indo-European language speaking LEP population 5 years and over is 597
- Asian and Pacific Islander language speaking LEP population 5 years and over is 545
- Other language speaking LEP population 5 years and over is 252

The above data demonstrates that less than 15 percent of the jurisdiction's population is considered LEP (9.3%) and that only Spanish meets the 5% or 1,000 person threshold for requiring written translation of vital documents. While the total LEP population for Bethlehem, Pennsylvania is 6,616—the largest LEP population segment, Spanish Speaking, consists of 5,222 persons 5 years of age and older. This demographic background requires written translations and the City of Bethlehem Department of Community and Economic Development does provide vital documents in Spanish and has a bilingual (Spanish) staff member to assist Spanish-speaking clients, prospective clients and members of the general public.

**2. Frequency with which LEP persons come into contact with the program activity or service.** It has been the experience of Bethlehem's Community and Economic Development staff that Spanish-speaking LEP persons contacting the City for information or assistance was an infrequent occurrence. Nevertheless, the City has bilingual staffing and Spanish-language vital documents.

**3. Importance of the service, information, program, and/or activity.** The services provided by the City of Bethlehem CDBG and HOME Programs are important as they relate to a client's need for or continued provision of affordable housing and information/referral to other vital services.

**4. Resources, financial and human, available to the recipient.** Because of the very low frequency of contact from LEP persons seeking assistance from the Department of Community and Economic Development, the additional salary required to add a person with bilingual skills is deemed to be an unnecessary expense at this time. The City believes it is more cost effective to continue to use existing staff for the relatively few cases where language assistance is required.

The City of Bethlehem CDBG and HOME Programs also use appropriate Spanish-language materials provided by HUD, including Fair Housing posters, and other sources.

The CDBG and HOME Programs will seek to retain the services of a professional interpretation service to provide oral interpretation in languages other than Spanish as needed.



## Northampton County

The County as a CDBG entitlement community is required to develop a plan for persons of different national origins that cannot speak, read, write, or understand English to ensure that LEP persons have meaningful access to CDBG funded programs and services, as well as all County programs and services. As such, the County has updated its Four Factor Analysis. The purpose of the Four Factor Analysis is to determine the reasonableness of language assistance for LEP persons based on the following:

**1. Number or Proportion of LEP persons in the population to be served.** It is estimated that the County has one non-English speaking populations that exceed the 5% or 1,000 person LEP limit. That non-English speaking population speaks Spanish. There are additional non-English speakers in the County but in very limited numbers.

**2. Frequency with which LEP persons come into contact with the program activity or service.** Northampton County's Department of Community and Economic Development uses CDBG funds for activities that directly assist County residents, such as: planning, housing rehabilitation, public facility improvements, and public service activities.

According to the FY 2018 CAPER and Report PR-23, the total beneficiaries of CDBG assistance in PY 2018 were 4,847 individuals; 247 were Black/African American, 4,123 were White, 5 were Asian, 15 were American Indian/Alaskan Native, 457 was Other, Multi-Racial, and 297 were Hispanic.

**3. Importance of the service, information, program, and/or activity.** The County's CDBG housing and public service activities are critical to the County's residents for access to decent, safe, sanitary, and affordable housing, as well as necessary in terms of supportive services to maintaining residents' quality of life. The County, local advocacy groups and organizations, and its subrecipient agencies must be able to outreach and interact with LEP persons to make CDBG programs and services accessible to LEP persons.

**4. Resources, financial and human, available to the recipient.** Translation and interpretive services are vital for housing and public services activities and would be provided by the County, either through County staff or a community liaison, to any beneficiary that requires those services. Additionally, CDBG citizen participation materials and public notices will be published with the statement, "Any non-English speaking person wishing to attend the public hearing should contact (Name) at least seven (7) calendar days prior to the meeting and a Spanish interpreter will be provided. This document and program materials are available in Spanish upon request." These statements will be translated in Spanish.

The County does not have a formal written Language Access Plan. Specific to the CDBG Program, its staff and subrecipients, utilize the following language assistance plan to assist LEP persons:

- Engaging advocacy groups to promote services available through the CDBG Program
- Interpretation and translation services by partnering with LEP groups, faith based organizations, and schools
- Referrals to community liaisons proficient in the language of LEP persons
- Notices and training to staff of the availability of LEP services
- Advertising language services in outreach documents
- Utilize HUD translated documents found at:  
[https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/17lep](https://www.hud.gov/program_offices/fair_housing_equal_opp/17lep)

## 10. Taxes

While real estate tax rates may not be an impediment to fair housing choice, the amount and method of calculation of taxes impacts the affordability of housing especially as it relates to housing in the surrounding area.

The following table shows the millage rates for the borough and townships of Northampton County.

**Tax Rates in Northampton County for 2018–2019**

Place	City	School	County	Total
<b>Bethlehem</b>	0.01822	0.05597	0.0118	0.08599
<b>Easton</b>	0.02495	0.06414	0.0118	0.10089
<b>Allentown City Land</b>	0.02353	0.01972	0.00364	0.05135
<b>Allentown City Building</b>	0.00445	0.01972	0.00364	0.02777
<b>County of Northampton</b>	-	-	0.0118	0.0118

Source: County of Northampton Assessment Division and Office of Assessment Lehigh County

Real estate tax rates are the highest in the Cities as compared to the County. Studies have shown that property values tend to appreciate slower in areas of higher effective property tax rates as compared to areas of lower effective property tax rates. This is of course contingent on the real tax rate as it relates to assessed home values.

## 11. Comprehensive Plan

The Lehigh Valley Planning Commission (LVPC) in 2019 released the region's fifth comprehensive plan. FutureLV establishes goals, policies and actions designed to carry the region through 2045 and beyond, but it will be updated every four years to account for the changes of a successful and growing region. FutureLV refreshes a 2005 plan that had substantial updates in 2010, and is among the first comprehensive plans in the nation that merges the land use, economic, environmental, housing, preservation and farming policies with the transportation planning and investment policies of the Lehigh Valley Transportation Study. FutureLV covers both Lehigh and Northampton counties, creating a forward-thinking strategy that leads the region into the future, while addressing the needs of today. Source: [www.lvpc.org/comprehensive-plan.html](http://www.lvpc.org/comprehensive-plan.html)

The following goals were identified in the Plans:

### **Goal #1 – Efficient and Coordinated Development Pattern**

A booming economy, beautiful topography and a wide variety of arts and cultural activities define a region that is growing in people, jobs and opportunities. Managing that growth is key as our 62 municipalities strive to build on a regional sense of place that attracts thousands of new residents every year. Directing growth toward a series of Centers and Corridors will help create the dynamic communities of the future, while preserving our natural beauty, history and agricultural land. Working together as a region, we can prepare for a future in which lifestyles, technology and climate are changing dramatically.

### **Goal #2 – Connected Mixed-Transportation Region**

A seamless network where roads, trails, sidewalks and technology connect everyone to every place—that's the goal. For the Lehigh Valley to reach its potential, we must design a transportation system that is welcoming to drivers, walkers and rollers—regardless of age, income or ability—and lay the groundwork for the next generation of technology and communications. Our network of the future will provide transportation and communications options that connect work, home and places where people want to go, both locally and regionally.

Compact walkable, bikeable and safe neighborhoods improve job accessibility and enable people to spend less time in a car. Investing in existing roads, bridges, transit lines and utilities, while using next generation technology to manage freight traffic and enable new job opportunities, will

create a dynamic system that improves the flow of goods, services and people.

### **Goal #3 – Protected and Vibrant Environment**

Lehigh Valley residents have come to consider our urban parks, rolling farmlands and scenic vistas as core to the regional identity. Whether it's enabling people to have active lifestyles, providing food or helping to make the region more resilient against climate change, those assets provide health, economic and environmental benefits that are key to our success.

Protecting our land, water and air preserves our region's character and makes it an attractive place to live, work and visit. Enhancing those assets will improve our quality of life and puts the region on a path to a sustainable future.

### **Goal #4 – Competitive, Creative and Sustainable Region**

Our dynamic economy draws on our location, people and natural assets. Nearly 100,000 people commute to the Lehigh Valley daily for its bustling job market. Another 15 million flock here each year to experience recreation and cultural attractions. To keep the region's advantage in a global economy, we need to leverage our prime location and unique character, diversify the regional economy and train the workforce of tomorrow. A key part of that plan includes supporting agriculture and natural resources as economic assets and giving everyone equal access to attainable housing, jobs and transportation. Cooperation among local governments and institutions will be essential to reaching these targets and preparing the region for the challenges to come.

### **Goal #5 – Safe, Healthy, Inclusive and Livable Communities**

The Lehigh Valley's identity begins and ends with quality of life. It rests in safe, walkable neighborhoods, where housing is attainable and public space is designed for everyone. We'll get there through targeted investments, innovative community design and the integration of housing, jobs and transportation that everyone can use. The American Dream is here for the taking.

The Comprehensive Plan does not contain any policy that would impede fair housing choice. Goal #5 in particular encourages development that affirmatively furthers fair housing choice. The following objectives were identified that encourage fair housing choice:

- Promote safe and secure community design and emergency management.

- Implement complete street and traffic-calming measures.
  - Reduce bicycle and pedestrian fatalities towards zero.
  - Incorporate resiliency and hazard mitigation into planning and design, including 100- and 500-year floodplains.
  - Educate the public on hazard impacts and mitigation techniques.
  - Enhance planning and emergency response efforts among emergency management personnel.
  - Reduce blight to improve safety and accessibility in communities.
- Increase social and economic access to daily needs for all people.
  - Encourage use of universal design.
  - Promote safe routes to schools and playgrounds.
  - Create public spaces in underserved areas.
  - Support cultural and social programs.
  - Ensure transportation accessibility for all persons.
  - Integrate mixed-transportation into public space design.
  - Improve connections between bus stops and pedestrian and bicycle infrastructure.
  - Improve data accessibility in public spaces.
- Create community spaces that promote physical and mental health.
  - Promote revitalization of walkable historic centers.
  - Improve walkability of post-war centers.
  - Ensure equitable access to fresh food and produce.
  - Support urban farming and community gardens.
  - Improve access to green spaces.
  - Promote street trees and pedestrian-scale lighting.
  - Strengthen sidewalk, bike route and trail infrastructure.
  - Diversify park programming.
- Promote development that complements the unique history, environment, culture and needs of the Valley.
  - Promote context-specific design solutions.
  - Encourage reuse of vacant and underutilized properties.
  - Promote adaptive reuse of historic buildings.
  - Strengthen historic main streets and cultural centers.
  - Create public spaces that reflect and enhance local culture.
  - Integrate visual and performing art into public space.
  - Support community arts.

## 12. Section 3

HUD's definition of Section 3 is:

*Section 3 is a provision of the Housing and Urban Development Act of 1968. The purpose of Section 3 to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low- and very low income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons.*

All Section 3 covered contracts for the Cities of Allentown, Bethlehem, Easton, and Northampton County include the following clause (referred to as the Section 3 clause):

A. The work to be performed under this contract is subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u (Section 3). The purpose of Section 3 is to ensure that employment and other economic opportunities generated by HUD assistance or HUD-assisted projects covered by Section 3, shall, to the greatest extent feasible, be directed to low- and very low-income persons, particularly persons who are recipients of HUD assistance for housing.

B. The parties to this contract agree to comply with HUD's regulations in 24 CFR part 135, which implement Section 3. As evidenced by their execution of this contract, the parties to this contract certify that they are under no contractual or other impediment that would prevent them from complying with the part 135 regulations.

C. The contractor agrees to send to each labor organization or representative of workers with which the contractor has a collective bargaining agreement or other understanding, if any, a notice advising the labor organization or workers' representative of the contractor's commitments under this Section 3 clause, and will post copies of the notice in conspicuous places at the work site where both employees and applicants for training and employment positions can see the notice. The notice shall describe the Section 3 preference, shall set forth minimum number and job titles subject to hire, availability of apprenticeship and training positions, the qualifications for each; and the name and location of the person(s) taking applications for each of the positions; and the anticipated date the work shall begin.

D. The contractor agrees to include this Section 3 clause in every subcontract subject to compliance with regulations in 24 CFR part 135, and agrees to take appropriate action, as provided in an applicable provision of the subcontract or in this Section 3 clause, upon a finding that the subcontractor is in violation of the regulations in 24 CFR part 135. The

contractor will not subcontract with any subcontractor where the contractor has notice or knowledge that the subcontractor has been found in violation of the regulations in 24 CFR part 135.

E. The contractor will certify that any vacant employment positions, including training positions, that are filled (1) after the contractor is selected but before the contract is executed, and (2) with persons other than those to whom the regulations of 24 CFR part 135 require employment opportunities to be directed, were not filled to circumvent the contractor's obligations under 24 CFR part 135.

F. Noncompliance with HUD's regulations in 24 CFR part 135 may result in sanctions, termination of this contract for default, and debarment or suspension from future HUD assisted contracts.

G. With respect to work performed in connection with Section 3 covered Indian housing assistance, Section 7(b) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450e) also applies to the work to be performed under this contract. Section 7(b) requires that to the greatest extent feasible (i) preference and opportunities for training and employment shall be given to Indians, and (ii) preference in the award of contracts and subcontracts shall be given to Indian organizations and Indian-owned Economic Enterprises. Parties to this contract that are subject to the provisions of Section 3 and Section 7(b) agree to comply with Section 3 to the maximum extent feasible, but not in derogation of compliance with Section 7(b).

The City of Allentown has the following Section 3 Goals: 5% participation. Additionally, the City of Allentown has a "Minority and Women's Enterprise Plan" that requires all responses to RFPs to include the following, "The bidders/offers must submit documentary evidence of minority and women business enterprises who have been contacted and to whom commitments have been made. Documentation of such solicitations and commitments shall be submitted concurrently with the bid." The minimum participation level for MBEs is 5% and for WBEs 3%.

The City of Bethlehem does not have any Section 3 Goals.

Northampton County does not have any Section 3 Goals.

All CDBG-funded construction contracts that are subject to Section 3 will include the following documents in the attachments to the bid package –

- CDBG Entitlement Program – Special Conditions (for applicable Program Year funding)
- Federal Labor Standards Provisions – HUD-4010

- Supplementary Conditions of the Contract for Construction – HUD-2554
- Copy of Wage Decision for the Project – General Decision Number – Publication Date
- §135.38 Section 3 Clause
- Employee Rights Under the Davis-Bacon Act – English & Spanish Versions (posters to be displayed at the job site)
- Payroll Reporting Form WH347 (with instructions)
- Record of Employee Interview – HUD-11
- Record of Employee Interview – HUD-11 (in Spanish, including instructions)
- Certified Payroll Form – Signature Authorization form
- Certificate of Compliance – Section 3
- Contractor's/Subcontractor's Statement of Workforce Needs
- Contractor's/Subcontractor's Estimated Project Workforce Breakdown

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

### **13. Transportation**

Renting or owning an affordable home is not the only factor in a resident's quality of life and access to fair housing. Having access to transportation, whether it is a private vehicle or a public bus, is just as important as the price of a rent or mortgage. Mobility determines whether a resident can access work, education, services, or healthcare.

#### **Lehigh and Northampton County Transit Authority (LANta)**



The local bus and paratransit system within the Lehigh Valley is colloquially known as LANta. LANta operates 36 unique bus routes, with seven (7) "Flex" routes, using a fleet of 84 buses. LANta's paratransit service, known as LANtaVan, uses a fleet of 85 vehicles. The bus routes typically run as early as 5 AM to as late as midnight. People with disabilities and elderly residents may call LANtaVan for door-to-door service, though they do not offer same-day service. Residents that wish to use LANtaVan must call, at the latest, by 4:30 PM the day before their desired scheduled ride; conversely, residents cannot call more than fourteen (14) days prior to their desired appointment.



LANta updates its routes at least three (3) times per year, and works closely with the Lehigh Valley Planning Commission and with the individual municipalities within the County. The majority of routes run through the Cities of Allentown, Bethlehem, and Easton, though there is service to the suburban and rural areas of Northampton County and the greater Lehigh Valley. The following table is LANta's classification system for buses.

Classification	Route Series Designation	Target Areas
Trunk Routes	100's	Regional core corridors with highest levels of population and employment density.
Urban Routes	200's	Urban core corridors with secondary levels of population and employment density.
Commuter Routes	300's	Suburban communities with large numbers of workers commuting to a CBD or suburban employment centers with large numbers of workers commuting from central city areas.
Capacity Enhancing Specials	400's	Areas of high demand from high school and middle school students.
Flex Routes	500's	Suburban areas with isolated population or employment centers.
Special Market Routes	600's	Areas with market specific transportation needs.
Enhanced Bus	1's	Areas along trunk corridors exhibiting demand warranting additional service and capital improvements.

Source: Transit Supportive Land Use for the Lehigh Valley

LANta adopted a study for a Bus Rapid Transit (BRT) system in 2014. The study explored the demand and potential for BRT service along conceptualized corridors. LANta worked with the public through a number of outlets, including advisory committee meetings, board workshops, open houses, and stakeholder meetings to select the corridors and contribute to the plan's goals and objectives. LANta continuously uses elements of the plan as they become affordable, but to date, the BRT has not received any funding.

LANta planners regularly seek out new developments within the Lehigh Valley, with the goal of addressing quality of life infrastructure for transit users before new developments break ground. LANta's Transit Supportive Land Use policies encourage developers to add transit supportive infrastructure if they wish to be considered for bus services. The following are examples of the requirements for a comprehensive pedestrian network associated with public transit, as well as examples of appropriate site planning:

- Sidewalks on both sides of all streets and throughout commercial developments;
- Marked crosswalks at intersections;
- Pedestrian islands, or “refuges” for crossing wide streets; and
- Pedestrian only phases in traffic signals where pedestrian traffic is heavy.
- Minimized walking distances from the street to the main destinations of the development.

### **Lehigh Valley Planning Commission’s Lehigh Valley Transportation Study (LVTS)**

The Lehigh Valley Transportation Study (LVTS) services both Northampton County and Lehigh County within the Lehigh Valley, and is the Metropolitan Planning Organization (MPO) for the region. LVTS conducts regular committee meetings for its two committees, the Technical Committee and the Coordinating Committee. The Coordinating Committee sets policies after reviewing the Technical Committee’s findings.

### **Lehigh Valley Planning Commission’s MoveLV Long-Term Transportation Plan**

The MoveLV Plan considers transportation planning beyond just a level of service (LOS) for a given area. In its Project Evaluation section, MoveLV lists the following criteria for planning documents and data metrics:

- Mobility
- Public/Private Partnerships
- Municipal Considerations
- Consistency with Regional Comprehensive Plan
- Air Quality
- Environmental Justice
- Transportation Alternatives
- Data Inputs

The Plan’s emphasis on quality of life criteria seeks to address issues faced by the most vulnerable populations within Northampton County and the Lehigh Valley. LVPC regularly met with stakeholders and community representatives in order to define the list. The defined list helps LVPC monitor the progress and adjust accordingly as new information comes in. Public participation, according to the Long Range Plan, is mandated by Federal Transportation Legislation, the Civil Rights Act, the Americans with Disabilities Act, and Environmental Justice considerations. LVPC publicized meetings in a timely manner, and meetings were fully accessible to

members of the public that required special considerations, such as people with disabilities, or that required translation services.







#### 14. Education

School districts, particularly “good” school districts, is an oft-cited reason for families to move into an area. There are ten (10) public school districts within Northampton County, including the Cities of Bethlehem and Easton, hosting approximately sixty-five (65) schools. The City of Allentown, located in Lehigh County, has its own school district with twenty-two (22) schools.

Pennsylvania Department of Education (PDE) used the Pennsylvania School Performance Profile (SPP) to assess a school’s performance until 2017. The purpose of the SPP was to provide a “building level academic score”. The categories are defined as <60, 60-69.9, 70-79.9, 80-89.9, 90-99.9 and >100. Both of Allentown’s High Schools had scores below 60.

In the fall of 2018, PDE switched to the Future Ready PA Index, with the intent to move away from standardized testing, and instead “ensure that all Pennsylvanians, whether children or adults, have access to a high quality education system that prepares them for future success.” The Future Ready PA Index tracks enrollment statistics such as students who are economically disadvantaged, learning English as a second language, are homeless, or are in foster care.

The following table highlights the Future Ready PA Index for the participant communities:

> 100	90-100	80-89.9	70-79.9	60-69.9	<60
					

#### School Performance 2017 Northampton County, PA

Jurisdiction	School	Building Level Academic Score	State Rankings
Bethlehem Area SD	Liberty High School	68.2	
Bethlehem Area SD	Freedom High School	73.0	
Easton Area SD	Easton Area High School	76.9	
Allentown City SD	William Allen High School	45.7	
Allentown City SD	Louis E Dieruff High School	47.2	

Bangor Area SD	Bangor Area High School	75.9	■
Catasauqua Area SD	Catasauqua Senior High School	63.7	▼
Nazareth Area SD	Nazareth Area High School	95.3	△
Northampton Area SD	Northampton Area High School	85.0	▲
Northern Lehigh SD	Northern Lehigh Senior High School	79.2	■
Pen Argyl Area SD	Pen Argyl Area High School	75.3	■
Saucon Valley SD	Saucon Valley Senior High School	90.4	△
Wilson Area SD	Wilson Area High School	92.3	△

#### Allentown Area School District

- 16,234 District Enrollment
- 4,043 Charter School Enrollment
- 70.9% Hispanic, 14.5% Black, 9.9% White, 3.1% Two or More Races
- 82.5% Economically Disadvantaged
- Partnering Career and Technical Center - Lehigh Career & Technical Institute - 949 Student Enrollment

#### Bangor Area School District

- 2,968 District Enrollment
- 80 Charter School Enrollment
- 88.9% White, 5.5% Hispanic, 2.7% Two or More Races, 1.9% Black
- Economically Disadvantaged - 44.1%
- Partnering Career and Technical Center - Career Institute of Technology

#### Bethlehem Area School District

- 13,636 District Enrollment
- Charter School Enrollment
- 42.6% White, 40.6% Hispanic, 10.8% Black, 3.5% Asian
- 58.5% Economically Disadvantaged
- Partnering Career and Technical Center -

#### Catasauqua Area School District

- Information not available

#### Easton Area School District

- 8,583 District Enrollment
- Charter School Enrollment
- 47.9% White, 25.2% Hispanic, 17.4% Black, 5.1% Asian
- 50.1% Economically Disadvantaged
- Partnering Career and Technical Center -

#### Nazareth Area School District

- 4,724 District Enrollment
- Charter School Enrollment
- 85.1% White, 6.3% Hispanic, 4.1% Asian, 2.6% Two or More Races
- 19.5% Economically Disadvantaged
- Partnering Career and Technical Center -

#### Northampton Area School District

- 5,568 District Enrollment
- Charter School Enrollment
- 85.3% White, 8.7% Hispanic, 3.3% Black, 1.7% 2 or More Races
- 34.4% Economically Disadvantaged
- Partnering Career and Technical Center -

#### Northern Lehigh Area School District

- Information not available

#### Pen Argyl Area School District

- 1,629 District Enrollment
- Charter School Enrollment
- 89.8% White, 4.7% Hispanic, 3.4% Two or More Races, 1.1% Black
- 39.5% Economically Disadvantaged
- Partnering Career and Technical Center -

#### Saucon Valley Area School District

- 2,160 District Enrollment
- Charter School Enrollment

- 85.2% White, 7.0% Hispanic, 3.0% Asian, 2.9% Two or More Races
- 29.5% Economically Disadvantaged
- Partnering Career and Technical Center -

#### Wilson Area School District

- 2,249 District Enrollment
- Charter School Enrollment
- 57.8% White, 20.9% Hispanic, 10.3% Black, 8.0% Two or More Races
- 49.4% Economically Disadvantaged
- Partnering Career and Technical Center -

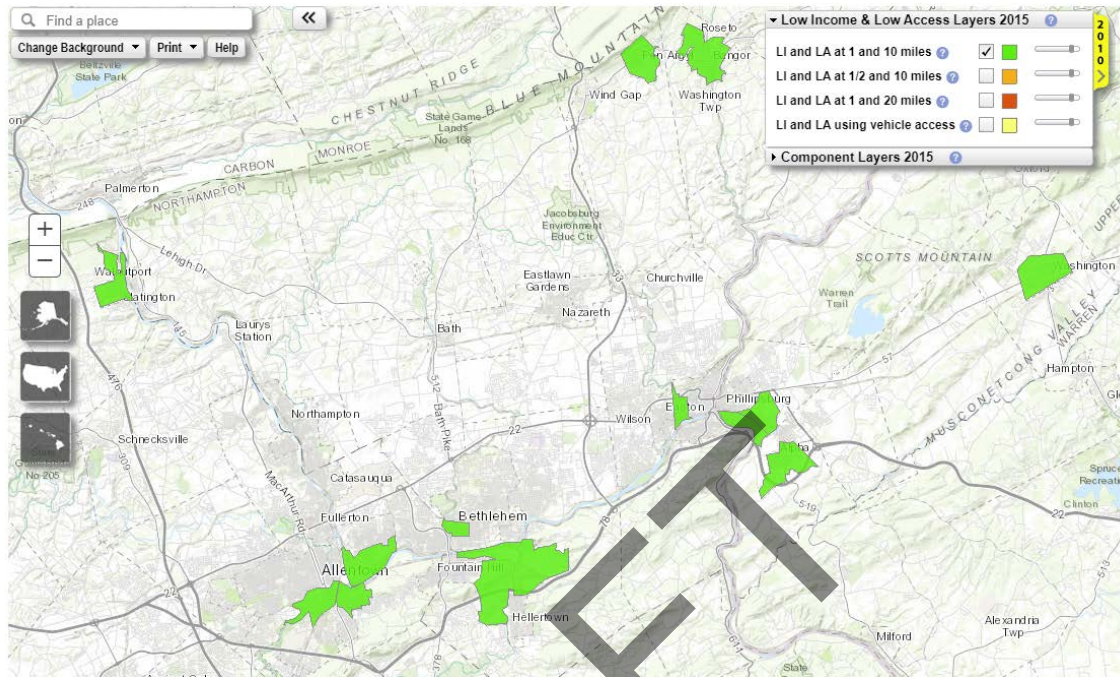
Most of the schools in Northampton County are more than 50% white.

### **15. Food Access**

Limited access to supermarkets, supercenters, grocery stores, or other sources of healthy and affordable food may make it harder for some Americans to eat a healthy diet. There are many ways to measure food store access for individuals and for neighborhoods, and many ways to define which areas are food deserts - neighborhoods that lack healthy food sources. Most measures and definitions take into account at least some of the following indicators of access:

- Accessibility to sources of healthy food, as measured by distance to a store or by the number of stores in an area.
- Individual-level resources that may affect accessibility, such as family income or vehicle availability.
- Neighborhood-level indicators of resources, such as the average income of the neighborhood and the availability of public transportation.

## Food Access Map



Source: [www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas](http://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas)

In the map above, low access to healthy food is defined as being far from a supermarket, supercenter, or large grocery store. A census tract is considered to have low access if a significant number or share of individuals in the tract is far from a supermarket. There are three (3) census tracts located in Allentown, two census tracts located in Bethlehem, and one (1) census tract located in Easton that are defined as having low access to healthy food.

### C. Private Sector:

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

## **1. Real Estate Practices**

Greater Lehigh Valley Realtors (GLVR) is a trade organization of real estate brokers operating in Lehigh, Northampton, and Carbon Counties. Greater Lehigh Valley Realtors members are bound by the Code of Ethics of the National Association of Realtors (NAR). Under the Code of Ethics, members must maintain professional standards including efforts to affirmatively furthering fair housing. Realtors must complete annual continuing education on topics that focus on protecting the rights of persons covered under the Fair Housing Act, the Civil Rights Act, and ADA laws.

GLVR has a Diversity and Community Involvement Committee, which identifies areas with which GLVR can help its members learn and grow.

GLVR has signed the Greater Lehigh Valley Chamber of Commerce's Diversity and LGBT Business Council's Business Pledge. By signing, GLVR affirms that the association, its members, and its affiliated real estate businesses are friendly with LGBT clients and will uphold and celebrate diversity and inclusiveness. Questions by homebuyers or realtors related to Fair Housing or the Fair Housing Act should be directed to the Government Affairs Director.

## **2. Real Estate Advertising**

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

Real estate advertisements were reviewed from several electronic sources such as: Facebook, Craigslist, Realtor.com, Rent.com, Zillow.com, LehighValleyLive.com and including *The Morning Call*. Some of the sources included a disclaimer from the publisher indicating that each advertisement is subject to the Federal Fair Housing Act and that all dwellings advertised are available on an equal opportunity basis. Most of the sources included the Fair Housing logo. None of the publications appeared to contain discriminatory language nor prohibited occupancy by any protected class.

## **3. Private Financing**

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal



Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The annual HMDA data can be found online at [www.ffiec.gov/hmda/](http://www.ffiec.gov/hmda/). The most recent HMDA Data is that of 2017, which is the data that was used for this analysis. The following tables provide an analysis of the HMDA data in the Allentown-Bethlehem-Easton PA-NJ Metropolitan Statistical Area (MSA). The MSA includes the Cities of Allentown, Bethlehem, and Easton. The boundaries between the City and the County are noncontiguous and Census Tracts can include both City and County residents. The home loans included in this report represent loans on 1- to 4-family and manufactured homes from the following loan types: 1) FHA, FSA/RHS and VA; 2) Conventional; 3) Refinancings; and 4) Home Improvement.

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The table below lists the lending activity that occurred during 2017 in the area.

Home Loans Purchased by Location of Property and Type of Loan								
Area	FHA, FSA/RHS & VA		Conventional		Refinancing		Home Improvement Loans	
	#	Amount	#	Amount	#	Amount	#	Amount
City of Allentown	531	67,252	570	69,429	413	45,046	105	4,537
City of Bethlehem	299	46,223	484	73,710	335	47,210	71	4,793
City of Easton	107	13,561	134	16,341	78	8,350	28	2,371
Northampton County	1,357	254,967	2,439	486,471	2,141	376,711	551	40,889
MSA	3,691	668,351	6,488	1,269,893	5,468	950,484	1,601	107,653
City of Allentown Loans as a % of MSA Loans	14.39%	10.06%	8.79%	5.47%	7.55%	4.74%	6.56%	4.21%
City of Bethlehem Loans as a % of MSA Loans	8.10%	6.92%	7.46%	5.80%	6.13%	4.97%	4.43%	4.45%
City of Easton Loans as a % of MSA Loans	2.90%	2.03%	2.07%	1.29%	1.43%	0.88%	1.75%	2.20%
Northampton County Loans as a % of MSA Loans	36.77%	38.15%	37.59%	38.31%	39.16%	39.63%	34.42%	37.98%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/PA/10900>

The table below lists the lending activity that occurred during 2017 in the area.

Home Loans Purchased by Location of Property and Type of Loan						
Loan		Loans Originated	Approved, Not Accepted	Applications Denied	Applications Withdrawn	File Closed for Incompleteness
FHA, FSA/RHS & VA	Allentown	531	9	128	72	15
	Bethlehem	299	7	40	40	10
	Easton	107	7	23	18	3
	Northampton County	1,357	32	186	228	35
	MSA	3,691	81	597	631	105
Conventional	Allentown	570	12	98	74	10
	Bethlehem	484	10	68	84	10
	Easton	134	6	14	19	3
	Northampton County	2,439	61	268	380	56
	MSA	6,488	195	810	978	166
Refinancings	Allentown	413	54	262	220	93
	Bethlehem	335	44	158	150	73
	Easton	78	13	63	50	28
	Northampton County	2,141	270	926	884	407
	MSA	5,468	578	2,442	2,179	1,079
Home Improvement Loans	Allentown	105	6	115	22	10
	Bethlehem	71	2	73	15	5
	Easton	28	3	37	2	1
	Northampton County	551	27	403	81	38
	MSA	1,601	77	1,032	259	100

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/PA/10900>

The table below lists the lending activity by income group to establish a baseline for lending activity per income.

Disposition of Loan Applications by Income of Applicant												
Loan	Income	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	Less than 50% of MSA/MD median	720	486	67.50%	15	2.08%	126	17.50%	77	10.69%	16	2.22%
	50-79% of MSA/MD median	1,635	1,196	73.15%	27	1.65%	185	11.31%	193	11.80%	34	2.08%
	80-99% of MSA/MD median	870	635	72.99%	16	1.84%	83	9.54%	117	13.45%	19	2.18%
	100-119% of MSA/MD median	638	477	74.76%	7	1.10%	50	7.84%	94	14.73%	10	1.57%
	120% or more of MSA/MD median	1,180	885	75.00%	16	1.36%	115	9.75%	139	11.78%	25	2.12%
Conventional	Less than 50% of MSA/MD median	644	422	65.53%	15	2.33%	137	21.27%	58	9.01%	12	1.86%
	50-79% of MSA/MD median	1,599	1,161	72.61%	40	2.50%	194	12.13%	170	10.63%	34	2.13%
	80-99% of MSA/MD median	1,033	752	72.80%	26	2.52%	116	11.23%	118	11.42%	21	2.03%
	100-119% of MSA/MD median	873	666	76.29%	13	1.49%	84	9.62%	97	11.11%	13	1.49%
	120% or more of MSA/MD median	4,200	3,262	77.67%	95	2.26%	246	5.86%	515	12.26%	82	1.95%
Refinance	Less than 50% of MSA/MD median	1,190	974	31.43%	68	5.71%	426	35.80%	234	19.66%	88	7.39%
	50-79% of MSA/MD median	2,098	892	42.52%	95	4.53%	527	25.12%	402	19.16%	182	8.67%
	80-99% of MSA/MD median	1,342	626	46.56%	61	4.55%	288	21.46%	250	18.63%	117	8.72%

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	100-119% of MSA/MD median	1,268	584	46.06%	67	5.28%	279	22.00%	236	18.61%	102	8.04%
	120% or more of MSA/MD median	4,502	2,389	52.62%	233	5.18%	752	16.70%	783	17.39%	365	8.11%
Home Improvement	Less than 50% of MSA/MD median	355	112	31.55%	9	2.54%	201	56.62%	22	6.20%	11	3.10%
	50-79% of MSA/MD median	561	249	44.39%	13	2.32%	225	40.11%	52	9.27%	22	3.92%
	80-99% of MSA/MD median	393	207	52.67%	10	2.54%	134	34.10%	29	7.38%	13	3.315
	100-119% of MSA/MD median	330	176	53.33%	11	3.33%	101	30.61%	34	10.30%	8	2.42%
	120% or more of MSA/MD median	1,334	827	61.99%	33	2.47%	313	23.46%	119	8.92%	42	3.15%
Total	Less than 50% of MSA/MD median	2,909	1,394	47.92%	107	3.68%	890	30.59%	391	13.44%	127	4.37%
	50-79% of MSA/MD median	5,893	3,498	59.36%	175	2.97%	1,131	19.19%	817	13.86%	272	4.62%
	80-99% of MSA/MD median	3,638	2,220	61.02%	113	3.11%	621	17.07%	514	14.13%	170	4.67%
	100-119% of MSA/MD median	3,109	1,903	61.21%	98	3.15%	514	16.53%	661	21.26%	133	4.28%
	120% or more of MSA/MD median	11,216	7,343	65.47%	377	3.36%	1,426	12.71%	1,556	13.87%	514	4.58%
	TOTAL	26,765	16,358	61.12%	870	3.25%	4,582	17.12%	3,939	14.72%	1,216	4.54%

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2017/PA/10900>

The table below lists the lending activity by racial/ethnic group.

Disposition of Loan Applications by Race/Ethnicity of Applicant												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	7	5	71.43%	0	0.00%	2	28.57%	0	0.00%	0	0.00%
	Asian	43	34	79.07%	2	4.65%	2	4.65%	4	9.30%	1	2.33%
	Black or African American	296	203	68.58%	6	2.03%	46	15.54%	35	11.82%	6	2.03%
	Native Hawaiian or Other Pacific Islander	23	13	56.52%	0	0.00%	2	8.70%	7	30.43%	1	4.35%
	White	4,061	3,037	74.78%	61	1.50%	392	9.65%	486	11.97%	85	2.09%
	2 or more minority races	6	3	50.00%	0	0.00%	0	0.00%	2	33.33%	1	16.67%
	Joint (White/Minority Race)	64	46	71.88%	0	0.00%	5	7.81%	10	15.63%	3	4.69%
	Race Not Available	543	338	62.25%	12	2.21%	110	20.26%	76	14.00%	7	1.29%
	Hispanic or Latino	938	664	70.79%	13	1.39%	134	14.29%	104	11.09%	23	2.45%
Conventional	American Indian/Alaska Native	22	14	63.64%	0	0.00%	3	13.64%	5	22.73%	0	0.00%
	Asian	377	288	76.39%	3	0.80%	38	10.08%	34	9.02%	14	3.71%
	Black or African American	194	136	70.10%	7	3.61%	28	14.43%	21	10.82%	2	1.03%
	Native Hawaiian or Other Pacific Islander	20	7	35.00%	0	0.00%	5	25.00%	7	35.00%	1	5.00%
	White	6,719	5,127	76.31%	161	2.40%	584	8.69%	734	10.92%	113	1.68%

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	2 or more minority races	6	3	50.00%	0	0.00%	0	0.00%	3	50.00%	0	0.00%
	Joint (White/Minority Race)	100	76	76.00%	2	2.00%	11	11.00%	11	11.00%	0	0.00%
	Race Not Available	911	612	67.18%	16	1.76%	108	11.86%	143	15.70%	32	3.51%
	Hispanic or Latino	630	423	67.14%	10	1.59%	106	16.83%	75	11.90%	16	2.54%
Refinance	American Indian/Alaska Native	40	12	30.00%	4	10.00%	14	35.00%	6	15.00%	4	10.00%
	Asian	213	102	47.89%	11	5.16%	39	18.31%	43	20.19%	18	8.45%
	Black or African American	314	108	34.39%	16	5.10%	94	29.94%	63	20.06%	33	10.51%
	Native Hawaiian or Other Pacific Islander	24	6	25.00%	1	4.17%	8	33.33%	8	33.33%	1	4.17%
	White	8,074	3,932	48.70%	423	5.24%	1,625	20.13%	1,451	17.97%	643	7.96%
	2 or more minority races	8	2	25.00%	0	0.00%	2	25.00%	4	50.00%	0	0.00%
	Joint (White/Minority Race)	100	41	41.00%	8	8.00%	27	27.00%	19	19.00%	5	5.00%
	Race Not Available	1,627	642	39.46%	61	3.75%	463	28.46%	311	19.11%	150	9.22%
	Hispanic or Latino	622	215	34.57%	28	4.50%	171	27.49%	148	23.79%	60	9.65%
Home Improvement	American Indian/Alaska Native	22	9	40.91%	0	0.00%	12	54.55%	1	4.55%	0	0.00%
	Asian	53	22	41.51%	2	3.77%	21	39.62%	6	11.32%	2	3.77%
	Black or African American	97	26	26.80%	3	3.09%	58	59.79%	7	7.22%	3	3.09%
	Native Hawaiian or Other Pacific Islander	9	1	11.11%	0	0.00%	7	77.78%	0	0.00%	1	11.11%

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	White	2,444	1,374	56.22%	63	2.58%	741	30.32%	194	7.94%	72	2.95%
	2 or more minority races	4	1	25.00%	0	0.00%	3	75.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	36	18	50.00%	0	0.00%	14	38.89%	2	5.56%	2	5.56%
	Race Not Available	308	120	38.96%	8	2.60%	118	38.31%	46	14.94%	16	5.19%
	Hispanic or Latino	207	62	29.95%	1	0.48%	117	56.52%	16	7.73%	11	5.31%
Total	American Indian/Alaska Native	91	40	43.96%	4	4.40%	31	34.07%	12	13.19%	4	4.40%
	Asian	686	446	65.01%	18	2.62%	100	14.58%	87	12.68%	35	5.10%
	Black or African American	901	473	52.50%	32	3.55%	226	25.08%	126	13.98%	44	4.88%
	Native Hawaiian or Other Pacific Islander	76	27	35.53%	1	1.32%	22	28.95%	22	28.95%	4	5.26%
	White	21,298	13,470	63.25%	708	3.32%	3,342	15.69%	2,865	13.45%	913	4.29%
	2 or more minority races	24	9	37.50%	0	0.00%	5	20.83%	9	37.50%	1	4.17%
	Joint (White/Minority Race)	300	181	60.33%	10	3.33%	57	19.00%	42	14.00%	10	3.33%
	Race Not Available	3,389	1,712	50.52%	97	2.86%	799	23.58%	576	17.00%	205	6.05%
	Hispanic or Latino	2,397	1,364	56.90%	52	2.17%	528	22.03%	343	14.31%	110	4.59%
	Total	29,162	17,722	60.77%	922	3.16%	5,110	17.52%	4,082	14.00%	1,326	4.55%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/MD/41540>



The following tables will compare denial rates per racial/ethnic group and income to identify any group that may have higher denial rates than another. Higher denial rates are highlighted.

Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
Less than 50% of MSA/MD Median - Allentown, Bethlehem, Easton MSA												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	2	1	50.00%	0	0.00%	1	50.00%	0	0.00%	0	0.00%
	Asian	5	5	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Black or African American	31	20	64.52%	0	0.00%	9	29.03%	2	6.45%	0	0.00%
	Native Hawaiian or Other Pacific Islander	3	1	33.33%	0	0.00%	1	33.33%	1	33.33%	0	0.00%
	White	591	411	69.54%	14	2.37%	89	15.06%	61	10.32%	16	2.71%
	2 or more minority races	0	0	-	0	-	0	-	0	-	0	-
	Joint (White/Minority Race)	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Race Not Available	87	47	54.02%	1	1.15%	26	29.89%	13	14.94%	0	0.00%
	Hispanic or Latino	276	190	68.84%	6	2.17%	47	17.03%	26	9.42%	7	2.54%
Conventional	American Indian/Alaska Native	4	3	75.00%	0	0.00%	1	25.00%	0	0.00%	0	0.00%
	Asian	33	21	63.64%	0	0.00%	9	27.27%	2	6.06%	1	3.03%
	Black or African American	26	21	80.77%	1	3.85%	3	11.54%	1	3.85%	0	0.00%
	Native Hawaiian or Other Pacific Islander	5	1	20.00%	0	0.00%	2	40.00%	2	40.00%	0	0.00%

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	White	510	339	66.47%	14	2.75%	104	20.39%	45	8.82%	8	1.57%
	2 or more minority races	0	0	-	0	-	0	-	0	-	0	-
	Joint (White/Minority Race)	2	2	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Race Not Available	64	35	54.69%	0	0.00%	18	28.13%	8	12.50%	3	4.69%
	Hispanic or Latino	131	87	66.41%	1	0.76%	33	25.19%	9	6.87%	1	0.76%
Refinance	American Indian/Alaska Native	10	2	20.00%	1	10.00%	5	50.00%	1	10.00%	1	10.00%
	Asian	13	3	23.08%	0	0.00%	4	30.77%	6	46.15%	0	0.00%
	Black or African American	51	6	11.76%	4	7.84%	20	39.22%	16	31.37%	5	9.80%
	Native Hawaiian or Other Pacific Islander	1	0	0.00%	0	0.00%	0	0.00%	1	100.00%	0	0.00%
	White	919	317	34.49%	55	5.98%	309	33.62%	176	19.15%	62	6.75%
	2 or more minority races	2	2	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	9	1	11.11%	0	0.00%	6	66.67%	0	0.00%	2	22.22%
	Race Not Available	185	43	23.24%	8	4.32%	82	44.32%	34	18.38%	18	9.73%
	Hispanic or Latino	145	39	26.90%	4	2.76%	58	40.00%	33	22.76%	11	7.59%
Home Improvement	American Indian/Alaska Native	5	0	0.00%	0	0.00%	5	100.00%	0	0.00%	0	0.00%
	Asian	8	2	25.00%	1	12.50%	5	62.50%	0	0.00%	0	0.00%
	Black or African American	24	1	4.17%	2	8.33%	16	66.67%	4	16.67%	1	4.17%
	Native Hawaiian or Other Pacific Islander	3	0	0.00%	0	0.00%	3	100.00%	0	0.00%	0	0.00%

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	White	284	107	37.68%	6	2.11%	147	51.76%	15	5.28%	9	3.17%
	2 or more minority races	1	0	0.00%	0	0.00%	1	100.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	0	0	-	0	-	0	-	0	-	0	-
	Race Not Available	30	2	6.67%	0	0.00%	24	80.00%	3	10.00%	1	3.33%
	Hispanic or Latino	53	4	7.55%	0	0.00%	44	83.02%	2	3.77%	3	5.66%
Total	American Indian/Alaska Native	21	6	28.57%	1	4.76%	12	57.14%	1	4.76%	1	4.76%
	Asian	59	31	52.54%	1	1.69%	18	30.51%	8	13.56%	1	1.69%
	Black or African American	132	48	36.36%	7	5.30%	48	36.36%	23	17.42%	6	4.55%
	Native Hawaiian or Other Pacific Islander	12	2	16.67%	0	0.00%	6	50.00%	4	33.33%	0	0.00%
	White	2304	1174	50.95%	89	3.86%	649	28.17%	297	12.89%	95	4.12%
	2 or more minority races	3	2	66.67%	0	0.00%	1	33.33%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	12	4	33.33%	0	0.00%	6	50.00%	0	0.00%	2	16.67%
	Race Not Available	366	127	34.70%	9	2.46%	150	40.98%	58	15.85%	22	6.01%
	Hispanic or Latino	605	320	52.89%	11	1.82%	182	30.08%	70	11.57%	22	3.64%
	Total	3,514	1,714	48.78%	118	3.36%	1,072	30.51%	461	13.12%	149	4.24%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/MD/41540>

For loan applicants under 50% of MSA/MD Median income the following groups had denial rates that were 10% higher than the average denial rate:

- American Indian/Alaska Native FHA,FSA/RHS/, and VA loan denial rates of 50% (17.50% Average)
- Black or African American FHA,FSA/RHS/, and VA loan denial rates of 29.03% (17.50% Average)

- Native Hawaiian or Other Pacific Islander FHA,FSA/RHS/, and VA loan denial rates of 33.33 (17.50% Average)
- Race Not Available FHA,FSA/RHS/, and VA loan denial rates of 29.89% (17.50% Average)
- Native Hawaiian or Other Pacific Islander conventional loan denial rates of 40% (21.27% Average)
- American Indian or Alaskan Native refinance loan denial rate of 50.00% (35.80% Average)
- Black or African American home improvement loan denial rate of 73.9% (61.3% Average)
- Joint refinance loan denial rate of 66.67% (35.80% Average)
- Black or African American home improvement denial rate of 66.67% (56.62% Average)
- Native Hawaiian or Other Pacific Island home improvement denial rate of 100.00% (56.62% Average)
- Two or more minority races home improvement denial rate of 100.00% (56.62% Average)
- Race Not Available home improvement denial rate of 80.00% (56.62% Average)
- Hispanic or Latino home improvement denial rate of 83.02% (56.62% Average)

Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
50-79% of MSA/MD Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	3	2	66.67%	0	0.00%	1	33.33%	0	0.00%	0	0.00%
	Asian	7	6	85.71%	0	0.00%	0	0.00%	1	14.29%	0	0.00%
	Black or African American	99	67	67.68%	3	3.03%	16	16.16%	12	12.12%	1	1.01%
	Native Hawaiian or Other Pacific Islander	9	7	77.78%	0	0.00%	0	0.00%	2	22.22%	0	0.00%
	White	1,344	1001	74.48%	19	1.41%	131	9.75%	161	11.98%	32	2.38%

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	2 or more minority races	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	10	8	80.00%	0	0.00%	2	20.00%	0	0.00%	0	0.00%
	Race Not Available	162	104	64.20%	5	3.09%	35	21.60%	17	10.49%	1	0.62%
	Hispanic or Latino	346	256	73.99%	2	0.58%	44	12.72%	35	10.12%	9	2.60%
Conventional	American Indian/Alaska Native	5	3	60.00%	0	0.00%	1	20.00%	1	20.00%	0	0.00%
	Asian	62	47	75.81%	1	1.61%	6	9.68%	5	8.06%	3	4.84%
	Black or African American	31	21	67.74%	1	3.23%	5	16.13%	4	12.90%	0	0.00%
	Native Hawaiian or Other Pacific Islander	3	1	33.33%	0	0.00%	2	66.67%	0	0.00%	0	0.00%
	White	1,329	975	73.36%	36	2.71%	152	11.44%	139	10.46%	27	2.03%
	2 or more minority races	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	9	5	55.56%	0	0.00%	3	33.33%	1	11.11%	0	0.00%
	Race Not Available	159	108	67.92%	2	1.26%	25	15.72%	20	12.58%	4	2.52%
	Hispanic or Latino	184	120	65.22%	4	2.17%	38	20.65%	16	8.70%	6	3.26%
Refinance	American Indian/Alaska Native	11	5	45.45%	0	0.00%	5	45.45%	1	9.09%	0	0.00%
	Asian	34	14	41.18%	1	2.94%	10	29.41%	8	23.53%	1	2.94%
	Black or African American	81	23	28.40%	2	2.47%	29	35.80%	17	20.99%	10	12.35%
	Native Hawaiian or Other Pacific Islander	7	0	0.00%	0	0.00%	5	71.43%	1	14.29%	1	14.29%
	White	1,624	722	44.46%	83	5.11%	374	23.03%	304	18.72%	141	8.68%

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	2 or more minority races	1	0	0.00%	0	0.00%	1	100.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	9	2	22.22%	0	0.00%	6	66.67%	0	0.00%	1	11.11%
	Race Not Available	331	126	38.07%	9	2.72%	97	29.31%	71	21.45%	28	8.46%
	Hispanic or Latino	167	68	40.72%	11	6.59%	38	22.75%	36	21.56%	14	8.38%
Home Improvement	American Indian/Alaska Native	6	4	66.67%	0	0.00%	2	33.33%	0	0.00%	0	0.00%
	Asian	11	5	45.45%	0	0.00%	6	54.55%	0	0.00%	0	0.00%
	Black or African American	24	8	33.33%	0	0.00%	16	66.67%	0	0.00%	0	0.00%
	Native Hawaiian or Other Pacific Islander	2	0	0.00%	0	0.00%	2	100.00%	0	0.00%	0	0.00%
	White	452	212	46.90%	12	2.65%	171	37.83%	40	8.85%	17	3.76%
	2 or more minority races	0	0	-	0	-	0	-	0	-	0	-
	Joint (White/Minority Race)	3	0	0.00%	0	0.00%	2	66.67%	0	0.00%	1	33.33%
	Race Not Available	63	20	31.75%	1	1.59%	26	41.27%	12	19.05%	4	6.35%
	Hispanic or Latino	59	18	30.51%	0	0.00%	33	55.93%	4	6.78%	4	6.78%
Total	American Indian/Alaska Native	25	14	56.00%	0	0.00%	9	36.00%	2	8.00%	0	0.00%
	Asian	114	72	63.16%	2	1.75%	22	19.30%	14	12.28%	4	3.51%
	Black or African American	235	119	50.64%	6	2.55%	66	28.09%	33	14.04%	11	4.68%
	Native Hawaiian or Other Pacific Islander	21	8	38.10%	0	0.00%	9	42.86%	3	14.29%	1	4.76%
	White	4,749	2,910	61.28%	150	3.16%	828	17.44%	644	13.56%	217	4.57%

<b>2 or more minority races</b>	3	2	66.67%	0	0.00%	1	33.33%	0	0.00%	0	0.00%
<b>Joint (White/Minority Race)</b>	31	15	48.39%	0	0.00%	13	41.94%	1	3.23%	2	6.45%
<b>Race Not Available</b>	715	358	50.07%	17	2.38%	183	25.59%	120	16.78%	37	5.17%
<b>Hispanic or Latino</b>	756	462	61.11%	17	2.25%	153	20.24%	91	12.04%	33	4.37%
<b>Total</b>	<b>6,649</b>	<b>3,960</b>	<b>59.56%</b>	<b>192</b>	<b>2.89%</b>	<b>1,284</b>	<b>19.31%</b>	<b>908</b>	<b>13.66%</b>	<b>305</b>	<b>4.59%</b>

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/MD/41540>

For loan applicants 50-79% of MSA/MD Median income the following groups had denial rates that were 10% higher than the average denial rate:

- American Indian/Alaska Native FHA, FSA/RHS, and VA loan denial rate of 33.33% (11.31% Average)
- Race Not Available FHA, FSA/RHS, and VA loan denial rate of 21.60% (11.31% Average)
- Native Hawaiian or Other Pacific Islander conventional loan denial rate of 66.67% (12.13% Average)
- Joint conventional loan denial rate of 33.33% (12.13% Average)
- American Indian/Alaska Native refinance loan denial rate of 45.45% (25.12% Average)
- Black or African American refinance loan denial rate of 35.80% (25.12% Average)
- Native Hawaiian or Other Pacific Islander refinance loan denial rate of 71.43% (25.12% Average)
- Joint refinance loan denial rate of 66.67% (25.12% Average)
- Asian home improvement loan denial rate of 54.55% (40.11% Average)
- Black or African American home improvement loan denial rate of 66.67% (40.11% Average)
- Joint home improvement loan denial rate of 66.67% (40.11% Average)
- Hispanic or Latino home improvement loan denial rate of 55.93% (40.11% Average)

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Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
80-99% of MSA/MD Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	0	0	-	0	-	0	-	0	-	0	-
	Asian	9	7	77.78%	1	11.11%	0	0.00%	1	11.11%	0	0.00%
	Black or African American	60	40	66.67%	1	1.67%	7	11.67%	9	15.00%	3	5.00%
	Native Hawaiian or Other Pacific Islander	6	3	50.00%	0	0.00%	0	0.00%	2	33.33%	1	16.67%
	White	682	513	75.22%	14	2.05%	57	8.36%	87	12.76%	11	1.61%
	2 or more minority races	2	1	50.00%	0	0.00%	0	0.00%	1	50.00%	0	0.00%
	Joint (White/Minority Race)	8	6	75.00%	0	0.00%	0	0.00%	2	25.00%	0	0.00%
	Race Not Available	103	65	63.11%	0	0.00%	19	18.45%	15	14.56%	4	3.88%
	Hispanic or Latino	133	92	69.17%	2	1.50%	20	15.04%	17	12.78%	2	1.50%
Conventional	American Indian/Alaska Native	6	3	50.00%	0	0.00%	1	16.67%	2	33.33%	0	0.00%
	Asian	39	29	74.36%	0	0.00%	6	15.38%	2	5.13%	2	5.13%
	Black or African American	29	16	55.17%	3	10.34%	4	13.79%	6	20.69%	0	0.00%
	Native Hawaiian or Other Pacific Islander	2	0	0.00%	0	0.00%	1	50.00%	0	0.00%	1	50.00%
	White	838	626	74.70%	21	2.51%	86	10.26%	91	10.86%	14	1.67%
	2 or more minority races	3	0	0.00%	0	0.00%	0	0.00%	3	100.00%	0	0.00%
	Joint (White/Minority Race)	10	7	70.00%	1	10.00%	2	20.00%	0	0.00%	0	0.00%
	Race Not Available	106	71	66.98%	1	0.94%	16	15.09%	14	13.21%	4	3.77%
	Hispanic or Latino	70	43	61.43%	1	1.43%	10	14.29%	13	18.57%	3	4.29%
Refinance	American Indian/Alaska Native	5	0	0.00%	1	20.00%	1	20.00%	2	40.00%	1	20.00%
	Asian	22	11	50.00%	2	9.09%	3	13.64%	2	9.09%	4	18.18%
	Black or African American	38	16	42.11%	3	7.89%	11	28.95%	5	13.16%	3	7.89%



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	Native Hawaiian or Other Pacific Islander	4	1	25.00%	0	0.00%	2	50.00%	1	25.00%	0	0.00%
	White	1,058	503	47.54%	46	4.35%	211	19.94%	205	19.38%	93	8.79%
	2 or more minority races	1	0	0.00%	0	0.00%	1	100.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	7	4	57.14%	0	0.00%	3	42.86%	0	0.00%	0	0.00%
	Race Not Available	207	91	43.96%	9	4.35%	56	27.05%	35	16.91%	16	7.73%
	Hispanic or Latino	77	21	27.27%	4	5.19%	27	35.06%	18	23.38%	7	9.09%
Home Improvement	American Indian/Alaska Native	2	1	50.00%	0	0.00%	1	50.00%	0	0.00%	0	0.00%
	Asian	4	1	25.00%	0	0.00%	2	50.00%	0	0.00%	1	25.00%
	Black or African American	11	1	9.09%	1	9.09%	8	72.73%	0	0.00%	1	9.09%
	Native Hawaiian or Other Pacific Islander	1	0	0.00%	0	0.00%	1	100.00%	0	0.00%	0	0.00%
	White	336	185	55.06%	5	1.49%	111	33.04%	26	7.74%	9	2.68%
	2 or more minority races	0	0	-	0	-	0	-	0	-	0	-
	Joint (White/Minority Race)	8	3	37.50%	0	0.00%	4	50.00%	1	12.50%	0	0.00%
	Race Not Available	31	16	51.61%	4	12.90%	7	22.58%	2	6.45%	2	6.45%
	Hispanic or Latino	23	6	26.09%	0	0.00%	12	52.17%	3	13.04%	2	8.70%
Total	American Indian/Alaska Native	13	4	30.77%	1	7.69%	3	23.08%	4	30.77%	1	7.69%
	Asian	74	48	64.86%	3	4.05%	11	14.86%	5	6.76%	7	9.46%
	Black or African American	138	73	52.90%	8	5.80%	30	21.74%	20	14.49%	7	5.07%
	Native Hawaiian or Other Pacific Islander	13	4	30.77%	0	0.00%	4	30.77%	3	23.08%	2	15.38%
	White	2,914	1,827	62.70%	86	2.95%	465	15.96%	409	14.04%	127	4.36%
	2 or more minority races	6	1	16.67%	0	0.00%	1	16.67%	4	66.67%	0	0.00%
	Joint (White/Minority Race)	33	20	60.61%	1	3.03%	9	27.27%	3	9.09%	0	0.00%
	Race Not Available	447	243	54.36%	14	3.13%	98	21.92%	66	14.77%	26	5.82%
	Hispanic or Latino	303	162	53.47%	7	2.31%	69	22.77%	51	16.83%	14	4.62%

	Total	3,941	2,382	60.44%	120	3.04%	690	17.51%	565	14.34%	184	4.67%
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Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/MD/41540>

For loan applicants 80-99% of MSA/MD Median income the following groups had denial rates that were 10% higher than the average denial rate:

- Native Hawaiian or Other Pacific Islander conventional loan denial rate of 50.00% (11.23% Average)
- Native Hawaiian or Other Pacific Islander refinance loan denial rate of 50.00% (21.46% Average)
- Two or More Minority Races refinance loan denial rate of 100.00% (21.46% Average)
- Joint refinance loan denial rate of 42.86% (21.46% Average)
- Hispanic or Latino refinance loan denial rate of 35.06% (21.46% Average)
- American Indian or Alaska Native home improvement loan denial rate of 50.00% (34.10% Average)
- Asian home improvement loan denial rate of 50.00% (34.10% Average)
- Black or African American home improvement loan denial rate of 72.73% (34.10% Average)
- Native Hawaiian or Other Pacific Islander home improvement loan denial rate of 100.00% (34.10% Average)
- Joint home improvement loan denial rate of 50.00% (34.10% Average)
- Hispanic or Latino home improvement loan denial rate of 52.17% (34.10% Average)

Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
100-119% of MSA/MD Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Asian	8	7	87.50%	0	0.00%	1	12.50%	0	0.00%	0	0.00%
	Black or African American	35	28	80.00%	0	0.00%	2	5.71%	4	11.43%	1	2.86%
	Native Hawaiian or Other Pacific Islander	2	0	0.00%	0	0.00%	1	50.00%	1	50.00%	0	0.00%
	White	495	379	76.57%	5	1.01%	34	6.87%	69	13.94%	8	1.62%

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	2 or more minority races	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	15	11	73.33%	0	0.00%	0	0.00%	3	20.00%	1	6.67%
	Race Not Available	81	50	61.73%	2	2.47%	12	14.81%	17	20.99%	0	0.00%
	Hispanic or Latino	84	57	67.86%	1	1.19%	10	11.90%	15	17.86%	1	1.19%
Conventional	American Indian/Alaska Native	2	0	0.00%	0	0.00%	0	0.00%	2	100.00%	0	0.00%
	Asian	25	17	68.00%	1	4.00%	2	8.00%	3	12.00%	2	8.00%
	Black or African American	18	13	72.22%	0	0.00%	5	27.78%	0	0.00%	0	0.00%
	Native Hawaiian or Other Pacific Islander	4	3	75.00%	0	0.00%	0	0.00%	1	25.00%	0	0.00%
	White	709	550	77.57%	12	1.69%	68	9.59%	68	9.59%	11	1.55%
	2 or more minority races	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	12	7	58.33%	0	0.00%	2	16.67%	3	25.00%	0	0.00%
	Race Not Available	102	75	73.53%	0	0.00%	7	6.86%	20	19.61%	0	0.00%
	Hispanic or Latino	59	42	71.19%	0	0.00%	8	13.56%	8	13.56%	1	1.69%
Refinance	American Indian/Alaska Native	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Asian	25	12	48.00%	2	8.00%	4	16.00%	4	16.00%	3	12.00%
	Black or African American	27	14	51.85%	1	3.70%	9	33.33%	1	3.70%	2	7.41%
	Native Hawaiian or Other Pacific Islander	5	3	60.00%	1	20.00%	0	0.00%	1	20.00%	0	0.00%
	White	1,007	481	47.77%	51	5.06%	201	19.96%	195	19.36%	79	7.85%
	2 or more minority races	1	0	0.00%	0	0.00%	0	0.00%	1	100.00%	0	0.00%
	Joint (White/Minority Race)	9	4	44.44%	2	22.22%	2	22.22%	1	11.11%	0	0.00%
	Race Not Available	194	70	36.08%	10	5.15%	63	32.47%	33	17.01%	18	9.28%
	Hispanic or Latino	85	27	31.76%	3	3.53%	25	29.41%	23	27.06%	7	8.24%
Home Improvement	American Indian/Alaska Native	5	3	60.00%	0	0.00%	1	20.00%	1	20.00%	0	0.00%
	Asian	4	1	25.00%	0	0.00%	1	25.00%	1	25.00%	1	25.00%

	Black or African American	6	1	16.67%	0	0.00%	5	83.33%	0	0.00%	0	0.00%
	Native Hawaiian or Other Pacific Islander	1	0	0.00%	0	0.00%	1	100.00%	0	0.00%	0	0.00%
	White	278	158	56.83%	10	3.60%	78	28.06%	26	9.35%	6	2.16%
	2 or more minority races	2	0	0.00%	0	0.00%	2	100.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	1	0	0.00%	0	0.00%	1	100.00%	0	0.00%	0	0.00%
	Race Not Available	33	13	39.39%	1	3.03%	12	36.36%	6	18.18%	1	3.03%
	Hispanic or Latino	18	8	44.44%	1	5.56%	6	33.33%	2	11.11%	1	5.56%
Total	American Indian/Alaska Native	8	4	50.00%	0	0.00%	1	12.50%	3	37.50%	0	0.00%
	Asian	62	37	59.68%	3	4.84%	8	12.90%	8	12.90%	6	9.68%
	Black or African American	86	56	65.12%	1	1.16%	21	24.42%	5	5.81%	3	3.49%
	Native Hawaiian or Other Pacific Islander	12	6	50.00%	1	8.33%	2	16.67%	3	25.00%	0	0.00%
	White	2,489	1,568	63.00%	78	3.13%	381	15.31%	358	14.38%	104	4.18%
	2 or more minority races	5	2	40.00%	0	0.00%	2	40.00%	1	20.00%	0	0.00%
	Joint (White/Minority Race)	37	22	59.46%	2	5.41%	5	13.51%	7	18.92%	1	2.70%
	Race Not Available	410	208	50.73%	13	3.17%	94	22.93%	76	18.54%	19	4.63%
	Hispanic or Latino	246	134	54.47%	5	2.03%	49	19.92%	48	19.51%	10	4.07%
	Total	3,355	2,037	60.72%	103	3.07%	563	16.78%	509	15.17%	143	4.26%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/MD/41540>

For loan applicants 100-119% of MSA/MD Median income the following groups had denial rates that were 10% higher than the average denial rate:

- Native Hawaiian or Other Pacific Islander FHA, FSA/RHS, and VA loan denial rate of 50.0% (7.84% Average)
- Black or African American conventional loan denial rate of 27.78% (9.62% Average)
- Black or African American refinance loan denial rate of 33.33% (22.00% Average)
- Race Not Available refinance loan denial rate of 32.47% (22.00% Average)

- Black or African American home improvement loan denial rate of 83.33% (30.61% Average)
- Native Hawaiian or Other Pacific Islander home improvement loan denial rate of 100.00% (30.61% Average)
- Two or More Minority Races home improvement loan denial rate of 100.0% (30.61% Average)
- Joint home improvement loan denial rate of 100.00% (30.61%Average)

Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
120% or More of MSA/MD Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Asian	14	9	64.29%	1	7.14%	1	7.14%	2	14.29%	1	7.14%
	Black or African American	71	48	67.61%	2	2.82%	12	16.90%	8	11.27%	1	1.41%
	Native Hawaiian or Other Pacific Islander	3	2	66.67%	0	0.00%	0	0.00%	1	33.33%	0	0.00%
	White	949	733	77.24%	9	0.95%	81	8.54%	108	11.38%	18	1.90%
	2 or more minority races	2	0	0.00%	0	0.00%	0	0.00%	1	50.00%	1	50.00%
	Joint (White/Minority Race)	30	20	66.67%	0	0.00%	3	10.00%	5	16.67%	2	6.67%
	Race Not Available	110	72	65.45%	4	3.64%	18	16.36%	14	12.73%	2	1.82%
	Hispanic or Latino	99	69	69.70%	2	2.02%	13	13.13%	11	11.11%	4	4.04%
Conventional	American Indian/Alaska Native	5	5	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Asian	218	174	79.82%	1	0.46%	15	6.88%	22	10.09%	6	2.75%

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	Black or African American	90	65	72.22%	2	2.22%	11	12.22%	10	11.11%	2	2.22%
	Native Hawaiian or Other Pacific Islander	6	2	33.33%	0	0.00%	0	0.00%	4	66.67%	0	0.00%
	White	3,333	2,637	79.12%	78	2.34%	174	5.22%	391	11.73%	53	1.59%
	2 or more minority races	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	67	55	82.09%	1	1.49%	4	5.97%	7	10.45%	0	0.00%
	Race Not Available	480	323	67.29%	13	2.71%	42	8.75%	81	16.88%	21	4.38%
	Hispanic or Latino	186	131	70.43%	4	2.15%	17	9.14%	29	15.59%	5	2.69%
Refinance	American Indian/Alaska Native	14	5	35.71%	2	14.29%	3	21.43%	2	14.29%	2	14.29%
	Asian	119	62	52.10%	6	5.04%	18	15.13%	23	19.33%	10	8.40%
	Black or African American	117	49	41.88%	6	5.13%	25	21.37%	24	20.51%	13	11.11%
	Native Hawaiian or Other Pacific Islander	7	2	28.57%	0	0.00%	1	14.29%	4	57.14%	0	0.00%
	White	3,466	1,909	55.08%	188	5.42%	530	15.29%	571	16.47%	268	7.73%
	2 or more minority races	3	0	0.00%	0	0.00%	0	0.00%	3	100.00%	0	0.00%
	Joint (White/Minority Race)	66	30	45.45%	6	9.09%	10	15.15%	18	27.27%	2	3.03%
	Race Not Available	710	312	43.94%	25	3.52%	165	23.24%	138	19.44%	70	9.86%
	Hispanic or Latino	148	60	40.54%	6	4.05%	23	15.54%	38	25.68%	21	14.19%
Home Improvement	American Indian/Alaska Native	4	1	25.00%	0	0.00%	3	75.00%	0	0.00%	0	0.00%
	Asian	26	13	50.00%	1	3.85%	7	26.92%	5	19.23%	0	0.00%

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	Black or African American	32	15	46.88%	0	0.00%	13	40.63%	3	9.38%	1	3.13%
	Native Hawaiian or Other Pacific Islander	2	1	50.00%	0	0.00%	0	0.00%	0	0.00%	1	50.00%
	White	1,094	712	65.08%	30	2.74%	234	21.39%	87	7.95%	31	2.83%
	2 or more minority races	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	24	15	62.50%	0	0.00%	7	29.17%	1	4.17%	1	4.17%
	Race Not Available	151	69	45.70%	2	1.32%	49	32.45%	23	15.23%	8	5.30%
	Hispanic or Latino	54	26	48.15%	0	0.00%	22	40.74%	5	9.26%	1	1.85%
Total	American Indian/Alaska Native	24	12	50.00%	2	8.33%	6	25.00%	2	8.33%	2	8.33%
	Asian	377	258	68.44%	9	2.39%	41	10.88%	52	13.79%	17	4.51%
	Black or African American	310	177	57.10%	10	3.23%	61	19.68%	45	14.52%	17	5.48%
	Native Hawaiian or Other Pacific Islander	18	7	38.89%	0	0.00%	1	5.56%	9	50.00%	1	5.56%
	White	8,842	5,991	67.76%	305	3.45%	1,019	11.52%	1,157	13.09%	370	4.18%
	2 or more minority races	7	2	28.57%	0	0.00%	0	0.00%	4	57.14%	1	14.29%
	Joint (White/Minority Race)	187	120	64.17%	7	3.74%	24	12.83%	31	16.58%	5	2.67%
	Race Not Available	1,451	776	53.48%	44	3.03%	274	18.88%	256	17.64%	101	6.96%
	Hispanic or Latino	487	286	58.73%	12	2.46%	75	15.40%	83	17.04%	31	6.37%
	Total	11,703	7,629	65.19%	389	3.32%	1501	12.83%	1639	14.00%	545	4.66%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/MD/41540>

For loan applicants 120% and over MSA/MD Median income the following groups had denial rates that were 10% higher than the average denial rate:

- American Indian or Alaska Native home improvement loan denial rate of 75.00% (23.46% Average)
- Black or African American home improvement loan denial rate of 40.63% (23.46% Average)
- Hispanic or Latino home improvement loan denial rate of 40.74% (23.46% Average)

Disposition of Loan Applications by Characteristics of Census Tract												
FHA, FSA/RHS and VA Loans												
	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
Racial/Ethnic Composition	Less than 10% minority	1,512	1,086	29.4%	26	32.1%	169	28.3%	201	31.9%	30	28.6%
	10-19% minority	1,514	1,122	30.4%	23	28.4%	146	24.5%	192	30.4%	31	29.5%
	20-49% minority	1,376	987	26.7%	17	21.0%	172	28.8%	167	26.5%	33	31.4%
	50-79% minority	573	413	11.2%	10	12.3%	83	13.9%	59	9.4%	8	7.6%
	80-100% minority	130	83	2.2%	5	6.2%	27	4.5%	12	1.9%	3	2.9%
Income Characteristics	Low income	220	153	4.1	6	7.4	34	5.7	22	3.5	5	4.8
	Moderate income	1,164	830	22.5	24	29.6	155	26.0	138	21.9	17	16.2
	Middle income	2,314	1,699	46.0	35	43.2	249	41.7	274	43.4	57	54.3
	Upper income	1,407	1,009	27.3	16	19.8	159	26.6	197	31.2	26	24.8
Low Income	Less than 10% minority	7	5	3.3	0	0.0	2	5.9	0	0.0	0	0.0
	10-19% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	20-49% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0



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	50-79% minority	145	102	66.7	3	50.0	21	61.8	16	72.7	3	60.0
	80-100% minority	68	46	30.1	3	50.0	11	32.4	6	27.3	2	40.0
Moderate Income	Less than 10% minority	154	111	13.4	1	4.2	19	12.3	20	14.5	3	17.6
	10-19% minority	160	109	13.1	4	16.7	19	12.3	25	18.1	3	17.6
	20-49% minority	428	310	37.3	10	41.7	48	31.0	53	38.4	7	41.2
	50-79% minority	360	263	31.7	7	29.2	53	34.2	34	24.6	3	17.6
	80-100% minority	62	37	4.5	2	8.3	16	10.3	6	4.3	1	5.9
Middle Income	Less than 10% minority	987	716	42.1	21	60.0	107	43.0	123	44.9	20	35.1
	10-19% minority	762	580	34.1	10	28.6	71	28.5	84	30.7	17	29.8
	20-49% minority	497	355	20.9	4	11.4	62	24.9	58	21.2	18	31.6
	50-79% minority	68	48	2.8	0	0.0	9	3.6	9	3.3	2	3.5
	80-100% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Upper Income	Less than 10% minority	364	254	25.2	4	25.0	41	25.8	58	29.4	7	26.9
	10-19% minority	592	433	42.9	9	56.3	56	35.2	83	42.1	11	42.3
	20-49% minority	451	322	31.9	3	18.8	62	39.0	56	28.4	8	30.8
	50-79% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	80-100% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0

Disposition of Loan Applications by Characteristics of Census Tract												
Conventional Loans												
	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
Racial/Ethnic Composition	Less than 10% minority	2,734	2,005	30.9	60	30.8	284	35.1	328	33.5	57	34.3
	10-19% minority	3,032	2,323	35.8	80	41.0	234	28.9	335	34.3	60	36.1
	20-49% minority	2,201	1,678	25.9	43	22.1	195	24.1	245	25.1	40	24.1
	50-79% minority	506	369	5.7	7	3.6	73	9.0	50	5.1	7	4.2
	80-100% minority	164	113	1.7	5	2.6	24	3.0	20	2.0	2	1.2
Income Characteristics	Low income	299	213	3.3	7	3.6	43	5.3	30	3.1	6	3.6
	Moderate income	1,172	866	13.3	25	12.8	133	16.4	131	13.4	17	10.2
	Middle income	3,340	2,484	38.3	85	43.6	330	40.7	383	39.2	58	34.9
	Upper income	3,826	2,925	45.1	78	40.0	304	37.5	434	44.4	85	51.2
Low Income	Less than 10% minority	5	4	1.9	0	0.0	1	2.3	0	0.0	0	0.0
	10-19% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	20-49% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	50-79% minority	171	124	58.2	2	28.6	27	62.8	14	46.7	4	66.7
	80-100% minority	123	85	39.9	5	71.4	15	34.9	16	53.3	2	33.3
Moderate Income	Less than 10% minority	135	103	11.9	2	8.0	18	13.5	11	8.4	1	5.9

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	10-19% minority	262	195	22.5	4	16.0	21	15.8	35	26.7	7	41.2
	20-49% minority	451	336	38.8	14	56.0	44	33.1	50	38.2	7	41.2
	50-79% minority	283	204	23.6	5	20.0	41	30.8	31	23.7	2	11.8
	80-100% minority	41	28	3.2	0	0.0	9	6.8	4	3.1	0	0.0
Middle Income	Less than 10% minority	1,571	1,129	45.5	42	49.4	182	55.2	189	49.3	29	50.0
	10-19% minority	1,035	796	32.0	31	36.5	85	25.8	108	28.2	15	25.9
	20-49% minority	682	518	20.9	12	14.1	58	17.6	81	21.1	13	22.4
	50-79% minority	52	41	1.7	0	0.0	5	1.5	5	1.3	1	1.7
	80-100% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Upper Income	Less than 10% minority	1,023	769	26.3	16	20.5	83	27.3	128	29.5	27	31.8
	10-19% minority	1,735	1,332	45.5	45	57.7	128	42.1	192	44.2	38	44.7
	20-49% minority	1,068	824	28.2	17	21.8	93	30.6	114	26.3	20	23.5
	50-79% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	80-100% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0

Disposition of Loan Applications by Characteristics of Census Tract												
Refinancing Loans												
	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
Racial/Ethnic Composition	Less than 10% minority	4,023	1,963	35.9	200	34.6	838	34.3	692	31.8	330	30.6
	10-19% minority	3,822	1,864	34.1	175	30.3	735	30.1	700	32.1	348	32.3
	20-49% minority	2,945	1,284	23.5	155	26.8	611	25.0	580	26.6	315	29.2
	50-79% minority	761	300	5.5	44	7.6	187	7.7	159	7.3	71	6.6
	80-100% minority	195	57	1.0	4	0.7	71	2.9	48	2.2	15	1.4
Income Characteristics	Low income	381	138	2.5	13	2.2	108	4.4	87	4.0	35	3.2
	Moderate income	1,751	701	12.8	85	14.7	429	17.6	349	16.0	187	17.3
	Middle income	5,085	2,371	43.4	261	45.2	1,110	45.5	902	41.4	441	40.9
	Upper income	4,529	2,258	41.3	219	37.9	795	32.6	841	38.6	416	38.6
Low Income	Less than 10% minority	14	8	5.8	0	0.0	2	1.9	3	3.4	1	2.9
	10-19% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	20-49% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	50-79% minority	233	89	64.5	10	76.9	60	55.6	50	57.5	24	68.6
	80-100% minority	134	41	29.7	3	23.1	46	42.6	34	39.1	10	28.6
Moderate Income	Less than 10% minority	282	108	15.4	8	9.4	77	17.9	51	14.6	38	20.3

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	<b>10-19% minority</b>	280	123	17.5	12	14.1	55	12.8	58	16.6	32	17.1
	<b>20-49% minority</b>	703	285	40.7	33	38.8	172	40.1	136	39.0	77	41.2
	<b>50-79% minority</b>	425	169	24.1	31	36.5	100	23.3	90	25.8	35	18.7
	<b>80-100% minority</b>	61	16	2.3	1	1.2	25	5.8	14	4.0	5	2.7
<b>Middle Income</b>	<b>Less than 10% minority</b>	2,418	1,165	49.1	130	49.8	525	47.3	403	44.7	195	44.2
	<b>10-19% minority</b>	1,578	754	31.8	72	27.6	330	29.7	290	32.2	132	29.9
	<b>20-49% minority</b>	986	410	17.3	56	21.5	228	20.5	190	21.1	102	23.1
	<b>50-79% minority</b>	103	42	1.8	3	1.1	27	2.4	19	2.1	12	2.7
	<b>80-100% minority</b>	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
<b>Upper Income</b>	<b>Less than 10% minority</b>	1,309	682	30.2	62	28.3	234	29.4	235	27.9	96	23.1
	<b>10-19% minority</b>	1,964	987	43.7	91	41.6	350	44.0	352	41.9	184	44.2
	<b>20-49% minority</b>	1,256	589	26.1	66	30.1	211	26.5	254	30.2	136	32.7
	<b>50-79% minority</b>	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	<b>80-100% minority</b>	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0

Disposition of Loan Applications by Characteristics of Census Tract												
Home Improvement Loans												
	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
Racial/Ethnic Composition	Less than 10% minority	1,190	654	40.8	37	48.1	351	34.0	106	40.9	42	42.0
	10-19% minority	1,010	558	34.9	17	22.1	324	31.4	83	32.0	28	28.0
	20-49% minority	618	307	19.2	18	23.4	224	21.7	52	20.1	17	17.0
	50-79% minority	196	64	4.0	5	6.5	100	9.7	16	6.2	11	11.0
	80-100% minority	55	18	1.1	0	0.0	33	3.2	2	0.8	2	2.0
Income Characteristics	Low income	120	43	2.7	4	5.2	62	6.0	7	2.7	4	4.0
	Moderate income	419	170	10.6	12	15.6	193	18.7	29	11.2	15	15.0
	Middle income	1,398	740	46.2	35	45.5	449	43.5	130	50.2	44	44.0
	Upper income	1,132	648	40.5	26	33.8	328	31.8	93	35.9	37	37.0
Low Income	Less than 10% minority	14	6	14.0	0	0.0	7	11.3	1	14.3	0	0.0
	10-19% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	20-49% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	50-79% minority	64	22	51.2	4	100.0	31	50.0	4	57.1	3	75.0
	80-100% minority	42	15	34.9	0	0.0	24	38.7	2	28.6	1	25.0
Moderate Income	Less than 10% minority	87	47	27.6	4	33.3	25	13.0	8	27.6	3	20.0

	10-19% minority	74	36	21.2	2	16.7	27	14.0	4	13.8	5	33.3
	20-49% minority	133	49	28.8	5	41.7	71	36.8	7	24.1	1	6.7
	50-79% minority	112	35	20.6	1	8.3	61	31.6	10	34.5	5	33.3
	80-100% minority	13	3	1.8	0	0.0	9	4.7	0	0.0	1	6.7
Middle Income	Less than 10% minority	726	395	53.4	22	62.9	216	48.1	67	51.5	26	59.1
	10-19% minority	429	223	30.1	8	22.9	155	34.5	33	25.4	10	22.7
	20-49% minority	223	115	15.5	5	14.3	70	15.6	28	21.5	5	11.4
	50-79% minority	20	7	0.9	0	0.0	8	1.8	2	1.5	3	6.8
	80-100% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Upper Income	Less than 10% minority	363	206	31.8	11	42.3	103	31.4	30	32.3	13	35.1
	10-19% minority	507	299	46.1	7	26.9	142	43.3	46	49.5	13	35.1
	20-49% minority	262	143	22.1	8	30.8	83	25.3	17	18.3	11	29.7
	50-79% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	80-100% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0

The following tables list reasons for denial by race, ethnicity, gender, and income.

BEAN Fair Housing Partnership

Reasons for Denial of Applications by Race, Ethnicity, Gender, and Income																				
FHA, FSA/RHS and VA Loans																				
	Cohort	Total	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Application Incomplete		Mortgage Insurance Denied		Other	
		#	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Race	American Indian/Alaska Native	1	0	0	0	0	0	0	1	100	0	0	0	0	0	0	0	0	0	0
	Asian	2	0	0	0	0	0	0	1	50	0	0	1	50	0	0	0	0	0	0
	Black or African American	36	5	13	4	11	14	38	5	13	0	0	1	2	4	11	0	0	3	8
	Native Hawaiian or Other Pacific Islander	1	0	0	1	100	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	White	265	53	20	9	3	80	30	49	18	14	5	11	4	27	10	0	0	22	8
	2 or more minority races	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Joint (White/Minority Race)	4	0	0	0	0	1	25	0	0	0	0	0	0	2	50	0	0	1	25
	Race Not Available	88	17	19	8	9	18	20	14	15	7	7	6	6	10	11	0	0	8	9
Ethnicity	Hispanic or Latino	95	20	21	7	7	29	30	17	17	5	5	3	3	8	8	0	0	6	6
	Not Hispanic or Latino	230	43	18	7	3	68	29	42	18	11	4	10	4	26	11	0	0	23	10



BEAN Fair Housing Partnership

	Joint (Hispanic or Latino/Not Hispanic or Latino)	2	0	0	0	0	1	50	1	50	0	0	0	0	0	0	0	0	0	0
	Ethnicity Not Available	71	12	16	8	11	15	21	10	14	5	7	6	8	9	12	0	0	6	8
Minority Status	White Non-Hispanic	189	37	19	5	2	52	27	37	19	10	5	8	4	21	11	0	0	19	10
	Others, Including Hispanic	4	0	0	2	50	0	0	2	50	0	0	0	0	0	0	0	0	0	0
Gender	Male	161	27	16	7	4	41	25	33	20	10	6	6	3	22	13	0	0	15	9
	Female	100	23	23	6	6	36	36	16	16	6	6	1	1	5	5	0	0	7	7
	Joint (Male/Female)	87	14	16	5	5	26	29	13	14	2	2	7	8	10	11	0	0	10	11
	Gender Not Available	50	11	22	4	8	10	20	8	16	3	6	5	10	6	12	0	0	3	6
Income	Less than 50% of MSA/MD median	85	28	32	13	15	17	20	11	12	5	5	3	3	3	3	0	0	5	5
	50-79% of MSA/MD median	108	22	20	3	2	31	28	24	22	9	8	5	4	9	8	0	0	5	4
	80-99% of MSA/MD median	53	8	15	2	3	13	24	11	20	3	5	3	5	6	11	0	0	7	13
	100-119% of MSA/MD median	35	6	17	2	5	7	20	8	22	0	0	2	5	7	20	0	0	3	8
	120% or more of MSA/MD median	85	9	10	2	2	16	18	15	17	4	4	6	7	18	21	0	0	15	17
	Income Not Available	32	2	6	0	0	29	90	1	3	0	0	0	0	0	0	0	0	0	0

BEAN Fair Housing Partnership

Reasons for Denial of Applications by Race, Ethnicity, Gender, and Income																				
Conventional Loans																				
	Cohort	Total	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Application Incomplete		Mortgage Insurance Denied		Other	
		#	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Race	American Indian/Alaska Native	3	0	0	0	0	0	0	2	66	0	0	0	0	1	33	0	0	0	0
	Asian	33	15	45	2	6	0	0	4	12	3	9	1	3	3	9	0	0	5	15
	Black or African American	25	9	36	1	4	6	24	6	24	0	0	1	4	1	4	0	0	1	4
	Native Hawaiian or Other Pacific Islander	5	3	60	0	0	0	0	0	0	1	20	0	0	0	0	0	0	1	20
	White	369	107	28	10	2	54	14	103	27	10	2	15	4	37	10	1	0	32	8
	2 or more minority races	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Joint (White/Minority Race)	9	3	33	0	0	1	11	2	22	0	0	0	0	3	33	0	0	0	0
	Race Not Available	90	23	25	5	5	10	11	17	18	5	5	3	3	18	20	0	0	9	10
Ethnicity	Hispanic or Latino	82	30	36	4	4	10	12	18	21	5	6	4	4	5	6	0	0	6	7
	Not Hispanic or Latino	350	104	29	10	2	49	14	96	27	7	2	12	3	39	11	1	0	32	9

BEAN Fair Housing Partnership

	Joint (Hispanic or Latino/Not Hispanic or Latino)	6	3	50	0	0	1	16	2	33	0	0	0	0	0	0	0	0	0	0
	Ethnicity Not Available	96	23	23	4	4	11	11	18	18	7	7	4	4	19	19	0	0	10	10
Minority Status	White Non-Hispanic	289	77	26	7	2	43	14	85	29	6	2	10	3	35	12	1	0	25	8
	Others, Including Hispanic	6	2	33	0	0	0	0	1	16	1	16	0	0	1	16	0	0	1	16
Gender	Male	224	74	33	7	3	27	12	59	26	9	4	8	3	23	10	0	0	17	7
	Female	125	32	25	6	4	21	16	27	21	6	4	10	8	14	11	0	0	9	7
	Joint (Male/Female)	135	40	29	3	2	20	14	39	28	1	0	2	1	14	10	1	0	15	11
	Gender Not Available	43	9	20	2	4	3	6	9	20	3	6	0	0	12	27	0	0	5	11
Income	Less than 50% of MSA/MD median	84	49	58	4	4	6	7	12	14	3	3	1	1	7	8	0	0	2	2
	50-79% of MSA/MD median	124	35	28	9	7	16	12	37	29	5	4	2	1	9	7	0	0	11	8
	80-99% of MSA/MD median	73	21	28	0	0	12	16	18	24	3	4	1	1	9	12	0	0	9	12
	100-119% of MSA/MD median	53	13	24	0	0	11	20	10	18	2	3	3	5	8	15	1	1	5	9
	120% or more of MSA/MD median	178	31	17	5	2	20	11	57	32	6	3	10	5	30	16	0	0	19	10
	Income Not Available	22	11	50	0	0	6	27	0	0	0	0	3	13	0	0	0	0	2	9

BEAN Fair Housing Partnership

Reasons for Denial of Applications by Race, Ethnicity, Gender, and Income																				
Refinancing Loans																				
	Cohort	Total	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Application Incomplete		Mortgage Insurance Denied		Other	
		#	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Race	American Indian/Alaska Native	10	7	70	0	0	1	10	0	0	0	0	0	0	2	20	0	0	0	0
	Asian	29	8	27	0	0	6	20	10	34	0	0	0	0	3	10	0	0	2	6
	Black or African American	62	10	16	2	3	15	24	14	22	5	8	0	0	7	11	0	0	9	14
	Native Hawaiian or Other Pacific Islander	6	3	50	0	0	0	0	1	16	0	0	0	0	2	33	0	0	0	0
	White	1077	237	22	6	0	261	24	256	23	25	2	20	1	165	15	1	0	106	9
	2 or more minority races	3	1	33	0	0	2	66	0	0	0	0	0	0	0	0	0	0	0	0
	Joint (White/Minority Race)	18	7	38	0	0	3	16	4	22	0	0	0	0	2	11	0	0	2	11
	Race Not Available	397	70	17	3	0	53	13	111	27	4	1	3	0	111	27	0	0	42	10
Ethnicity	Hispanic or Latino	140	48	34	1	0	27	19	26	18	2	1	2	1	21	15	0	0	13	9
	Not Hispanic or Latino	1087	228	20	6	0	265	24	264	24	28	2	17	1	169	15	1	0	109	10

BEAN Fair Housing Partnership

	Joint (Hispanic or Latino/Not Hispanic or Latino)	24	4	16	0	0	4	16	4	16	1	4	1	4	7	29	0	0	3	12
	Ethnicity Not Available	351	63	17	4	1	45	12	102	29	3	0	3	0	95	27	0	0	36	10
Minority Status	White Non-Hispanic	962	204	21	5	0	235	24	236	24	22	2	18	1	145	15	1	0	96	9
	Others, Including Hispanic	15	9	60	1	6	0	0	2	13	0	0	0	0	2	13	0	0	1	6
Gender	Male	536	129	24	3	0	114	21	116	21	8	1	8	1	99	18	1	0	58	10
	Female	334	76	22	1	0	89	26	70	20	7	2	6	1	46	13	0	0	39	11
	Joint (Male/Female)	472	93	19	4	0	110	23	131	27	16	3	7	1	76	16	0	0	35	7
	Gender Not Available	252	44	17	3	1	27	10	77	30	2	0	2	0	70	27	0	0	27	10
Income	Less than 50% of MSA/MD median	277	109	39	1	0	73	26	35	12	3	1	4	1	28	10	0	0	24	8
	50-79% of MSA/MD median	324	82	25	4	1	74	22	66	20	7	2	3	0	54	16	1	0	33	10
	80-99% of MSA/MD median	203	41	20	1	0	47	23	53	26	2	0	3	1	35	17	0	0	21	10
	100-119% of MSA/MD median	190	36	18	2	1	38	20	58	30	4	2	2	1	34	17	0	0	16	8
	120% or more of MSA/MD median	515	65	12	3	0	86	16	168	32	11	2	8	1	119	23	0	0	55	10
	Income Not Available	93	10	10	0	0	23	24	16	17	7	7	3	3	22	23	0	0	12	12

BEAN Fair Housing Partnership

Reasons for Denial of Applications by Race, Ethnicity, Gender, and Income																				
Home Improvement Loans																				
	Cohort	Total	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Application Incomplete		Mortgage Insurance Denied		Other	
		#	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Race	American Indian/Alaska Native	14	5	35	0	0	9	64	0	0	0	0	0	0	0	0	0	0	0	0
	Asian	19	10	52	0	0	6	31	1	5	0	0	1	5	0	0	0	0	1	5
	Black or African American	64	16	25	0	0	44	68	2	3	0	0	0	0	0	0	0	0	2	3
	Native Hawaiian or Other Pacific Islander	8	3	37	0	0	4	50	0	0	0	0	0	0	0	0	0	0	1	12
	White	636	159	25	5	0	343	53	70	11	9	1	4	0	16	2	0	0	30	4
	2 or more minority races	3	0	0	0	0	1	33	2	66	0	0	0	0	0	0	0	0	0	0
	Joint (White/Minority Race)	10	1	10	0	0	5	50	3	30	0	0	0	0	0	0	0	0	1	10
	Race Not Available	100	29	29	0	0	54	54	8	8	1	1	0	0	2	2	0	0	6	6
Ethnicity	Hispanic or Latino	125	31	24	0	0	76	60	8	6	1	0	0	0	2	1	0	0	7	31
	Not Hispanic or Latino	637	167	26	5	0	341	53	68	10	8	1	5	0	16	2	0	0	27	167

BEAN Fair Housing Partnership

	Joint (Hispanic or Latino/Not Hispanic or Latino)	9	0	0	0	0	7	77	0	0	1	11	0	0	0	0	0	0	1	0
	Ethnicity Not Available	85	25	29	0	0	44	51	9	10	0	0	0	0	1	1	0	0	6	25
Minority Status	White Non-Hispanic	554	141	25	5	0	291	52	62	11	8	1	4	0	16	2	0	0	27	141
	Others, Including Hispanic	21	8	38	0	0	11	52	0	0	0	0	0	0	0	0	0	0	2	8
Gender	Male	363	89	24	4	1	206	56	28	7	5	1	4	1	13	3	0	0	14	89
	Female	242	67	27	1	0	150	61	12	4	1	0	1	0	4	1	0	0	6	67
	Joint (Male/Female)	203	48	23	0	0	90	44	42	20	4	1	0	0	1	0	0	0	18	48
	Gender Not Available	46	18	39	0	0	21	45	3	6	0	0	0	0	1	2	0	0	3	18
Income	Less than 50% of MSA/MD median	175	67	38	2	1	87	49	7	4	2	1	1	0	1	0	0	0	8	67
	50-79% of MSA/MD median	176	54	30	0	0	103	58	7	3	1	0	0	0	3	1	0	0	8	54
	80-99% of MSA/MD median	114	37	32	2	1	52	45	15	13	1	0	0	0	3	2	0	0	4	37
	100-119% of MSA/MD median	81	17	20	0	0	47	58	8	9	2	2	1	1	3	3	0	0	3	17
	120% or more of MSA/MD median	254	44	17	1	0	129	50	47	18	3	1	3	1	9	3	0	0	18	44
	Income Not Available	56	4	7	0	0	50	89	1	1	1	1	0	0	0	0	0	0	0	4

**4. Insurance**

There was not suitable data available to determine if discrepancies existed in the rates and amounts of insurance coverage available to minority households in the Cities of Allentown, Bethlehem, Easton, and Northampton County. Further investigation and assessment are needed to determine if housing insurance is a significant barrier to fair housing choice in the area.

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## **D. Citizen Participation:**

The Cities of Allentown, Bethlehem, Easton, and Northampton County developed the Analysis of Impediments with input received through individual meetings and public meetings with a variety of stakeholders and representatives of the community which included representatives from the Cities and County; Housing Authority; community, social service, and advocacy agencies; and non-profit and for profit entities.

The County advertised and held three (3) public hearings on the impediments to fair housing choice in the City of Allentown, the City of Bethlehem, and the City of Easton that provided residents with the opportunity to discuss the County's AI and to offer their suggestions. The County held four (4) Needs Public Hearings on February 6, 2019, February 13, 2019, February 27, 2019, and March 6, 2019 to discuss fair housing issues. The draft AI was placed on public display starting on Wednesday, May 12, 2021 until Friday, June 11, 2021. The draft AI was available at the Northampton County's Department of Community and Economic Development website or by email.

The County held a public hearing on Thursday, June 10, 2021 during the draft display period. The draft display period ended on Friday, June 10, 2021 and County Council approved a resolution on June 17, 2021 to submit the AI to HUD.

In the "Citizen Participation" section of the Appendix is a complete documentation of all input received during the AI development period.

## V. Actions and Recommendations

The following impediments to fair housing choice and recommendations are presented to assist Northampton County to affirmatively further fair housing choice in the area. The previously identified impediments to fair housing choice were discussed in Section III and progress was reported for each impediment.

The Bethlehem, Easton, Allentown, Northampton (“BEAN”) Fair Housing Partnership’s FY 2020 Analysis of Impediments to Fair Housing Choice has identified the following impediments, goals, and strategies to affirmatively further fair housing:

- **Impediment 1: Need for Fair Housing Education and Outreach**

There is a need to improve the knowledge and understanding concerning the rights and responsibilities of individuals, families, members of the protected classes, landlords, real estate professionals, and public officials under the Fair Housing Act (FHA).

**Goal:** Improve the public’s knowledge and awareness of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing in the community.

**Strategies:** In order to meet this goal, the following actions should be undertaken:

- **1-A:** Educate residents of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **1-B:** Educate realtors, bankers, housing providers, and other real estate professionals of their responsibilities under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **1-C:** Educate policy makers and municipal staff about the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **1-D:** Support Fair Housing organizations and legal advocacy groups to assist persons who may be victims of housing discrimination.
- **1-E:** Identify the language and communication needs of LEP persons to provide the specific language assistance that is required.

- **Impediment 2: Need for Affordable Housing**

In the Allentown-Bethlehem-Easton, PA-NJ Metro Area, over one out of every two (52.2%) renter households in the area is paying over 30% of their monthly incomes on housing costs. Nearly, one out of every three (29.5%) owner households with a mortgage is paying over 30% of their monthly income on housing costs. The number of households that are housing cost burdened significantly increases as household income decreases.

**Goal:** Increase the supply of decent, safe, and sanitary housing that is affordable and accessible through the new construction and rehabilitation of various types of housing, especially housing that is affordable to lower income households.

**Strategies:** In order to meet this goal, the following actions should be undertaken:

- **2-A:** Support and encourage private developers and non-profit housing providers to create, through construction or rehabilitation, affordable mixed-income housing.
- **2-B:** Support and encourage the rehabilitation of existing renter-occupied and owner-occupied housing units in the area for households below 80% AMI.
- **2-C:** Support homebuyer education, training programs, and closing cost/down payment assistance to increase the number of owner-occupied housing units.
- **2-D:** Support tenant education and maintenance training programs to encourage and support healthy rental housing units.
- **2-E:** Create a landlord marketing program to encourage lower income rental housing participation.
- **2-F:** Provide federal, state and local funding in response to HMDA data discrimination patterns to support higher loan to value ratios for minority homebuyers.
- **2-G:** Participate in the regional housing database of decent, safe, and sanitary housing that is affordable and accessible for households below 80% AMI.

- **2-H:** Create affirmative marketing procedures that include the development of community networks to attract protected classes that are least likely to apply for new affordable housing opportunities.

- **Impediment 3: Need for Accessible Housing**

There is a lack of accessible housing units in the area as the supply of accessible housing has not kept pace with the demand of individuals desiring to live independently.

**Goal:** Increase the supply of accessible housing through new construction and rehabilitation of accessible housing for persons with disabilities.

**Strategies:** In order to meet this goal, the following actions should be undertaken:

- **3-A:** Promote the need for accessible and visitable housing by supporting and encouraging private developers and non-profits to develop, construct, or rehabilitate housing that is accessible to persons with disabilities.
- **3-B:** Provide financial assistance for accessibility improvements to renter-occupied and owner-occupied housing units to enable seniors and persons with disabilities to remain in their homes.
- **3-C:** Promote and enforce the ADA and Fair Housing requirements for landlords to make “reasonable accommodations” to their rental properties so are accessible to tenants.
- **3-D:** Create affirmative marketing procedures that include the development of community networks to attract persons with disabilities that are least likely to apply for new affordable housing opportunities.

- **Impediment 4: Public Policy**

The local Zoning Ordinances need additional definitions and provisions concerning Fair Housing.

**Goal:** Revise local Zoning Ordinances to promote the development of various types of affordable housing throughout the area.

**Strategies:** In order to meet this goal, the following actions should be undertaken:

- **4-A:** Revise local Zoning Ordinances to include additional definitions, statements, and revisions.
- **4-B:** Adopt a written Reasonable Accommodation Policy for housing developers and the Planning/Zoning Commission to follow when reasonable accommodation requests are made concerning zoning and land use as it applies to protected classes under the Fair Housing Act.
- **4-C:** Develop financial incentives to encourage developers and housing providers to offer more affordable housing options in the area.
- **4-D:** Encourage LMI, minority, and protected class resident participation in the various local Boards and Commissions.
- **4-E:** Specific to the County; the County will provide support, including fair housing education, to local municipalities to update their Zoning Ordinances to encourage fair housing choice.

- **Impediment 5: Regional Approach to Fair Housing**

There is a need for a regional collaborative approach to affirmatively further fair housing in the area.

**Goal:** Form a regional cooperative fair housing consortium to affirmatively further fair housing in the area.

**Strategies:** In order to meet this goal, the following actions should be undertaken:

- **5-A:** Form a regional fair housing consortium to encourage fair housing choice throughout the area.
- **5-B:** Through the regional fair housing consortium create regional fair housing activities and projects.
- **5-C:** Create a database of decent, safe, and sanitary housing that is affordable and accessible for households below 80% AMI.
- **5-D:** Work collaboratively with affordable housing developers/providers to ensure affirmative fair marketing plans and deconcentration policies are created and implemented.
- **5-E:** Support (financially and structurally) the local housing authority to address, "Impediment 6: Housing Authority Fair Housing."

The following Impediment is specific to the local public housing authorities:

- **Impediment 6: Housing Authority Fair Housing**

There is a need to improve the knowledge and implementation of fair housing rights and responsibilities as it pertains to housing authority activities.

**Goal:** Improve the housing authorities' actions to affirmatively further fair housing in the area.

**Strategies:** In order to meet this goal, the following actions should be undertaken:

- **6-A:** Provide annual fair housing training to all housing authority employees and staff.
- **6-B:** Provide annual fair housing and landlord training to all landlords participating in their voucher program.
- **6-C:** Informational resources will be made available to housing authority residents concerning fair housing, especially reasonable accommodations.
- **6-D:** Identify the language and communication needs of LEP persons to provide the specific language assistance that is required.
- **6-E:** Create a local affordable housing development corporation to develop decent, safe, and sanitary housing that is affordable and accessible.
- **6-F:** Continue to rehabilitate and modernized existing public housing units.
- **6-G:** Partner with local jurisdictions to provide residential rehabilitation funding for participation or interested voucher landlords.
- **6-H:** Continue to encourage homeownership opportunities to housing authority residents through their Family Self-Sufficiency (FSS) programs.
- **6-I:** Promote Section 3 Opportunities (jobs and training) to housing authority residents.

## VI. Certifications

### City of Allentown Signature Page:

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

\_\_\_\_\_  
Ray O'Connell, Mayor, City of Allentown, PA

\_\_\_\_\_  
Date

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**City of Bethlehem Signature Page:**

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

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Robert J. Donchez, Mayor, City of Bethlehem, PA

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Date

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**City of Easton Signature Page:**

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

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Sal Panto, Jr., Mayor, City of Easton, PA

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Date

DRAFT

**Northampton County Signature Page:**

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

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Lamont G. McClure, Jr., County Executive, Northampton County, PA

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Date

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## VII. Maps

The following maps are attached:

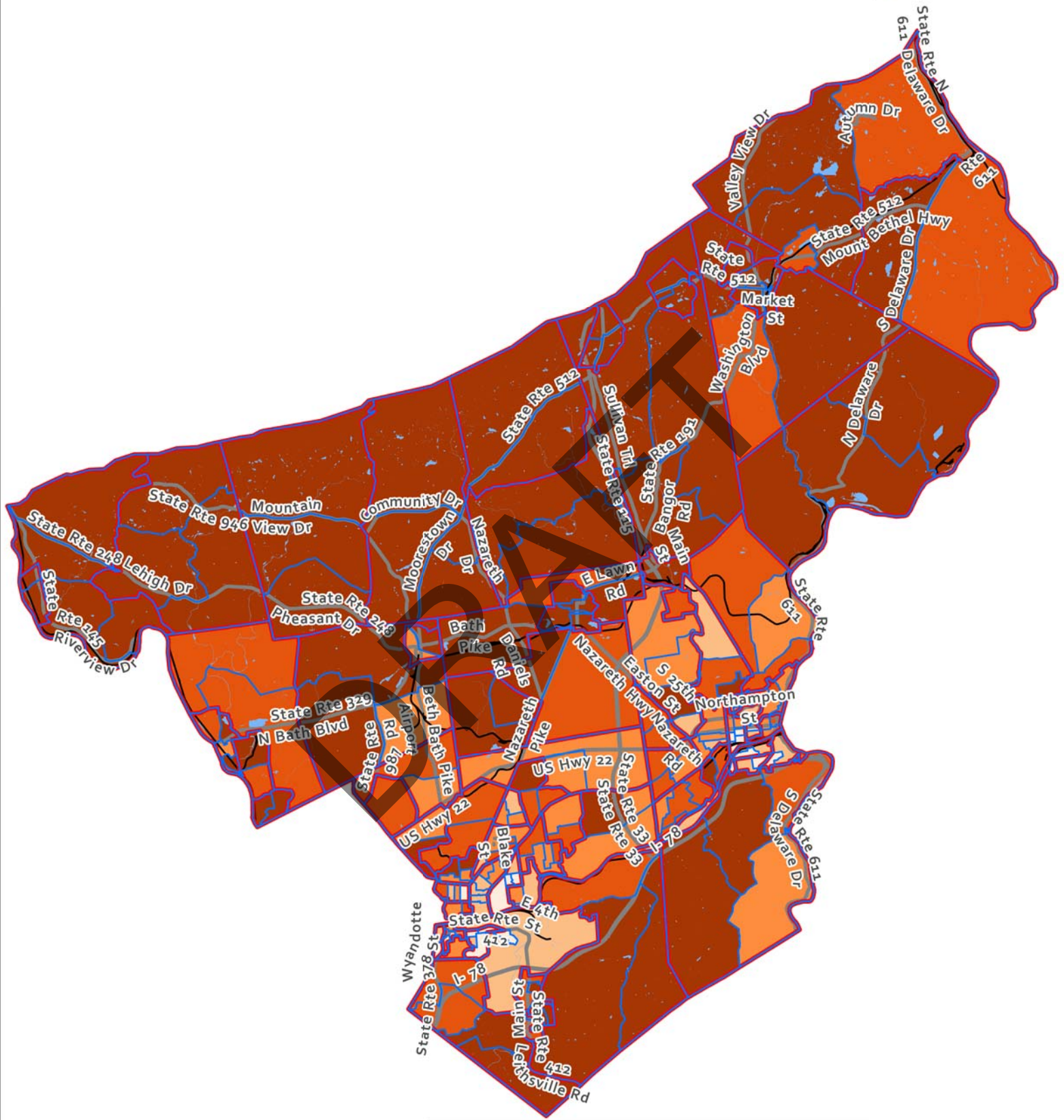
- Percent White Population by Block Group
- Percent Minority Population by Block Group
- Percent Population Age 65 and Over by Block Group
- Housing Density by Block Group
- Percent Owner Occupied Housing Units by Block Group
- Percent Renter Occupied Housing Units by Block Group
- Low- and Moderate-Income Percentage by Block Group
- Low- and Moderate-Income and Minority Percentage by Block Group

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# NORTHAMPTON COUNTY, PA PERCENT WHITE POPULATION BY BLOCK GROUP

BUILT ON EXPERIENCE  
**URBAN  
DESIGN  
VENTURES**



## LEGEND:

- Census Tracts
- Block Groups
- Major Roads
- Railroads
- Rivers

## Percent White Population by Block Group

- 0% - 42.7%
- 42.8% - 64.3%
- 64.4% - 77.5%
- 77.6% - 89.5%
- 89.6% - 100.0%

0 1 2 4 6 8  
Miles

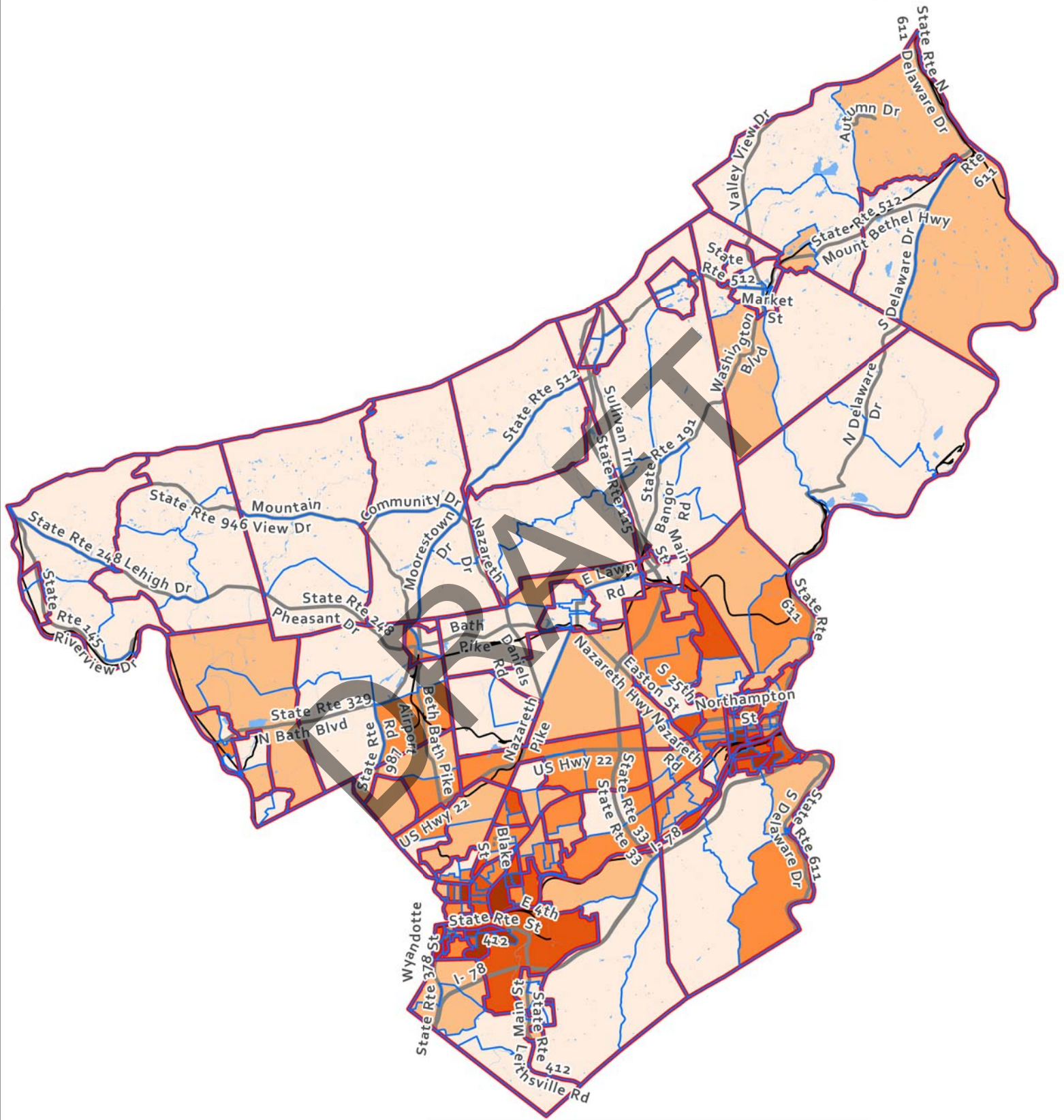
Source: 2013-2017  
ACS 5-Year Estimates





# NORTHAMPTON COUNTY, PA PERCENT MINORITY POPULATION BY BLOCK GROUP

BUILT ON EXPERIENCE  
**URBAN  
DESIGN  
VENTURES**



## LEGEND:

- Census Tracts
- Block Groups
- Major Roads
- Railroads
- Rivers

## Percent Minority Population by Block Group

- 0% - 9.9%
- 10.0% - 22.0%
- 22.1% - 34.6%
- 34.7% - 50.3%
- 50.4% - 93.1%

0 1 2 4 6 8  
Miles

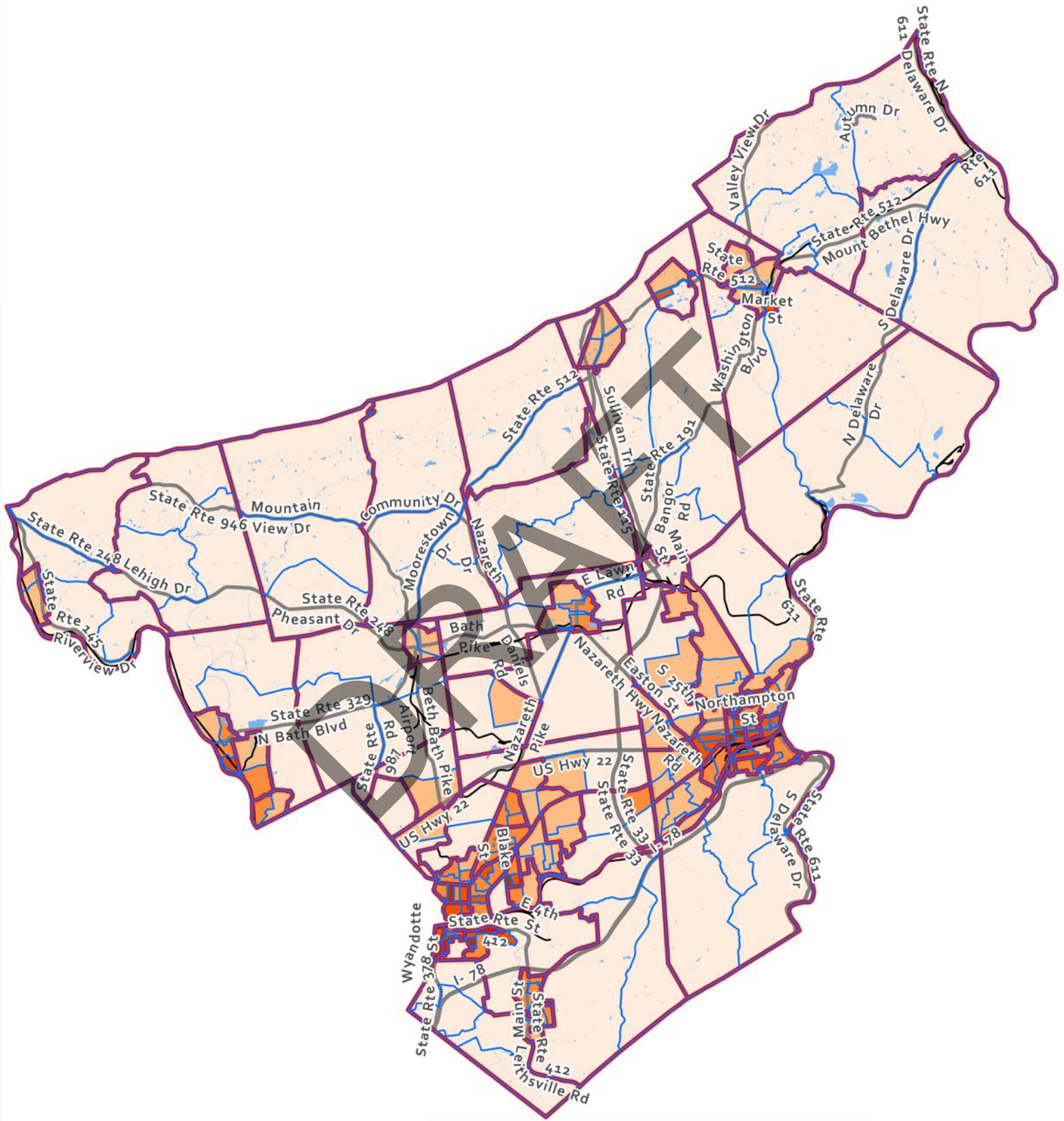
Source: 2013-2017  
ACS 5-Year Estimates





# NORTHAMPTON COUNTY, PA HOUSING UNIT DENSITY BY BLOCK GROUP

BUILT ON EXPERIENCE  
**URBAN  
DESIGN  
VENTURES**



## LEGEND:

- Census Tracts
- Block Groups
- Major Roads
- Railroads
- Rivers

## Housing Unit Density by Block Group

- $\leq 0.0002591$
- $\leq 0.0006990$
- $\leq 0.001373$
- $\leq 0.002439$
- $\leq 0.004584$

0 1 2 4 6 8  
Miles

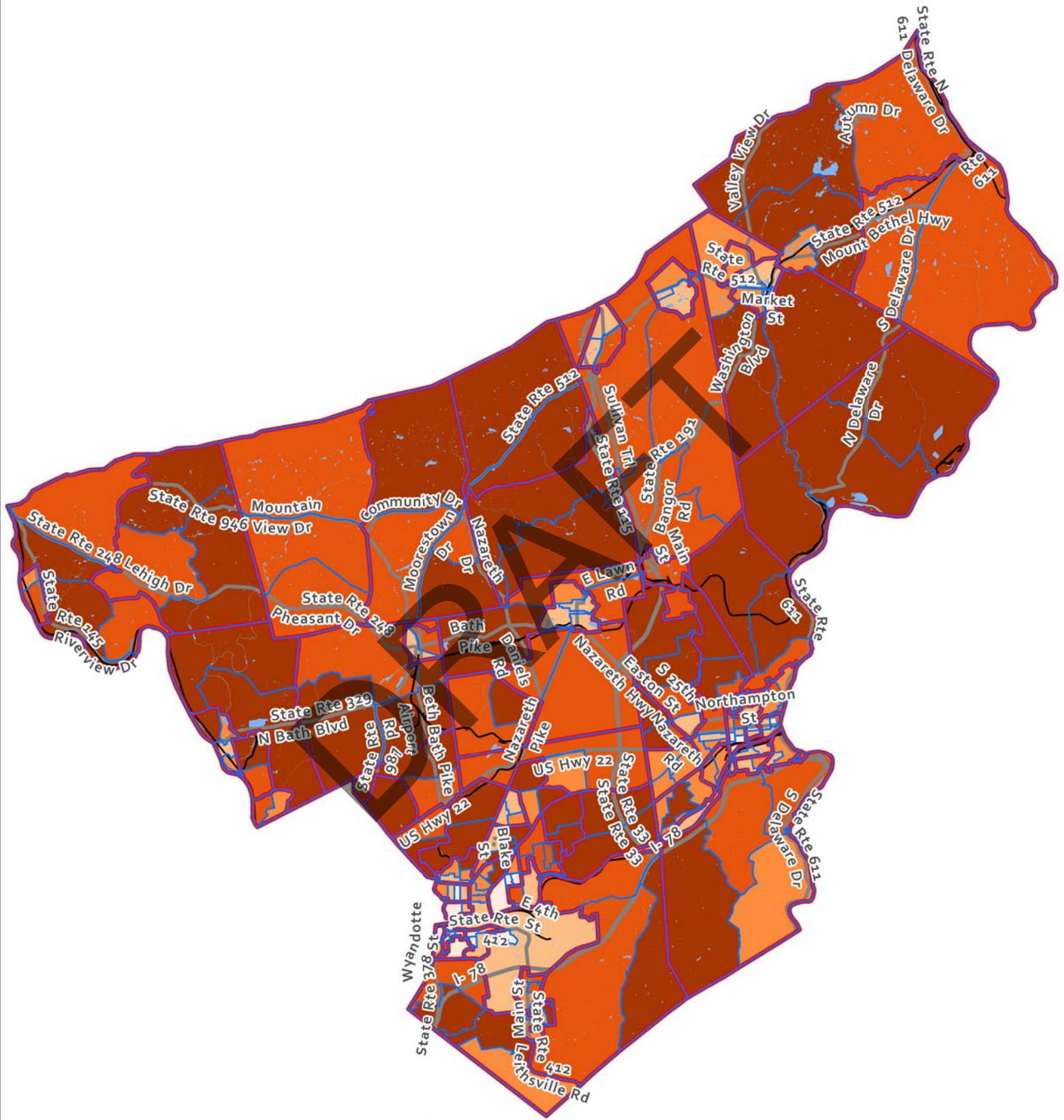
Source: 2013-2017  
ACS 5-Year Estimates





# NORTHAMPTON COUNTY, PA PERCENT OWNER-OCCUPIED BY BLOCK GROUP

BUILT ON EXPERIENCE  
**URBAN  
DESIGN  
VENTURES**



## LEGEND:

- Census Tracts
- Block Groups
- Major Roads
- Railroads
- Rivers

## Percent Owner-Occupied by Block Group

- 0% - 32.0%
- 32.1% - 55.8%
- 55.9% - 74.9%
- 75.0% - 88.7%
- 88.8% - 100.0%

0 1 2 4 6 8  
Miles

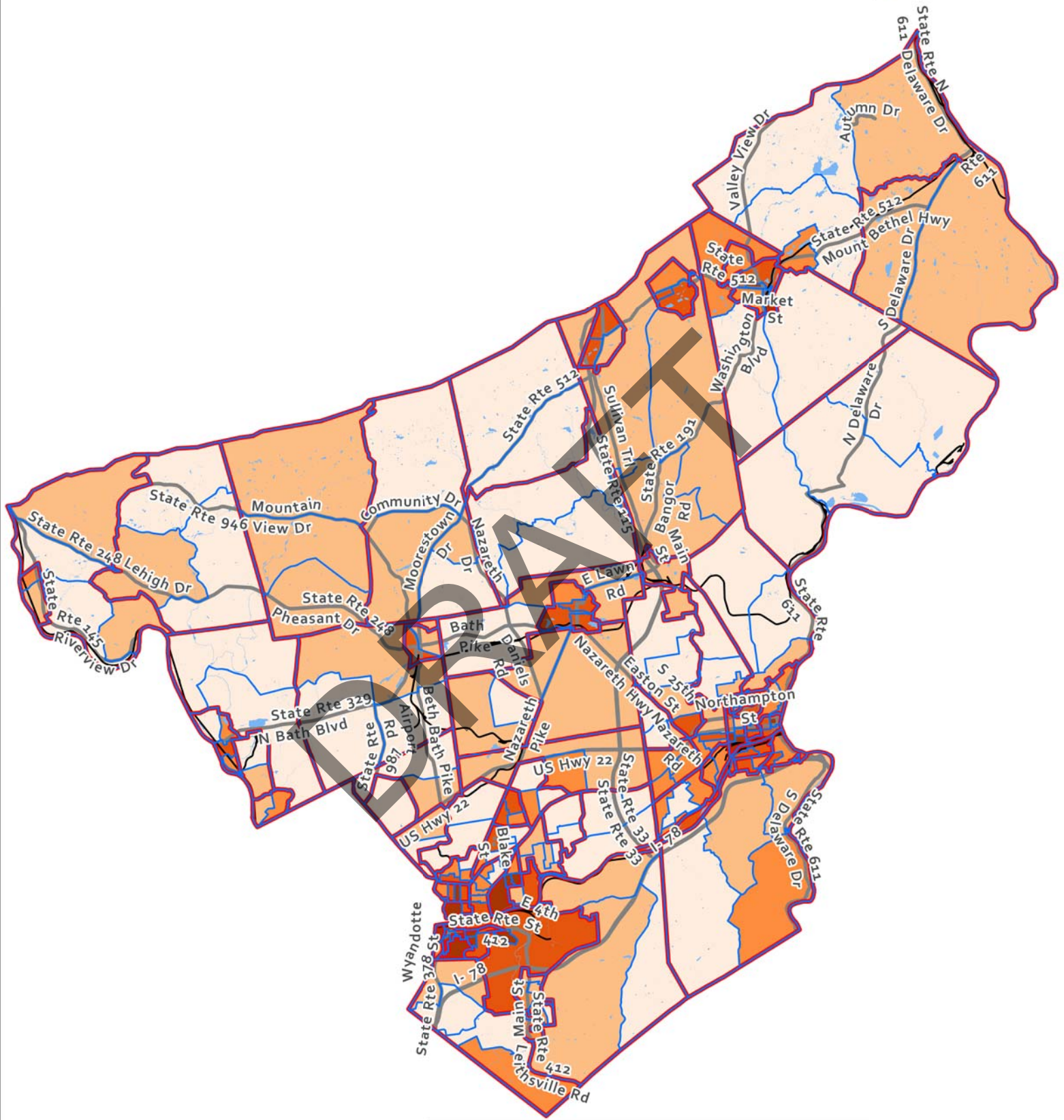
Source: 2013-2017  
ACS 5-Year Estimates





# NORTHAMPTON COUNTY, PA PERCENT RENTER-OCCUPIED BY BLOCK GROUP

BUILT ON EXPERIENCE  
**URBAN  
DESIGN  
VENTURES**



## LEGEND:

- Census Tracts
- Block Groups
- Major Roads
- Railroads
- Rivers

## Percent Renter-Occupied by Block Group

- 0% - 10.8%
- 10.9% - 24.9%
- 25.0% - 42.0%
- 42.1% - 66.0%
- 66.1% - 100.0%

0 1 2 4 6 8  
Miles

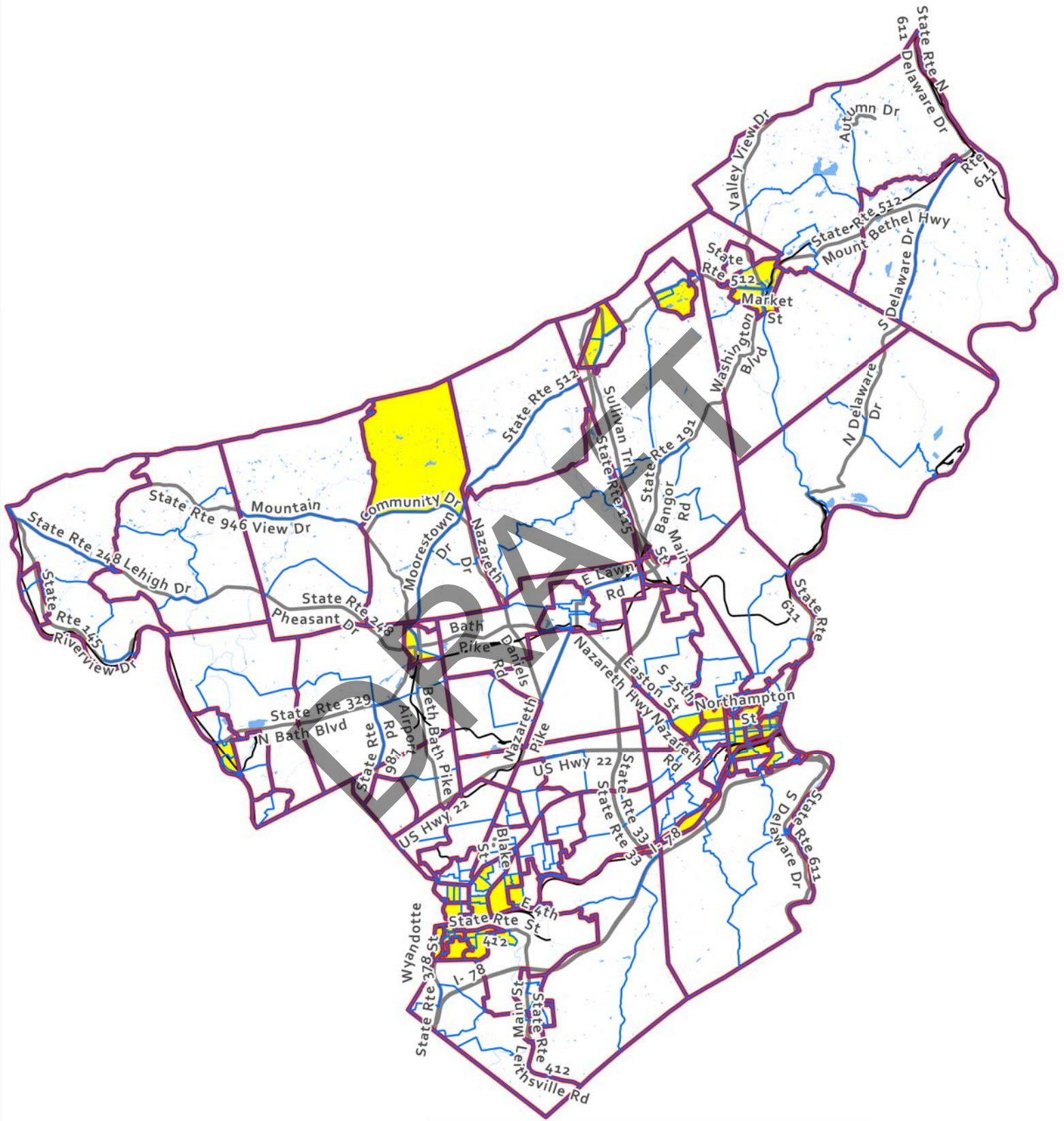
Source: 2013-2017  
ACS 5-Year Estimates





# NORTHAMPTON COUNTY, PA CDBG ELIGIBLE CENSUS BLOCK GROUPS

BUILT ON EXPERIENCE  
**URBAN  
DESIGN  
VENTURES**



## LEGEND:

- Census Tracts
- Block Groups
- Major Roads
- Railroads
- Rivers

## Block Group Parts by Low/Moderate Income Percentage

- Less than 51%
- 51% or More

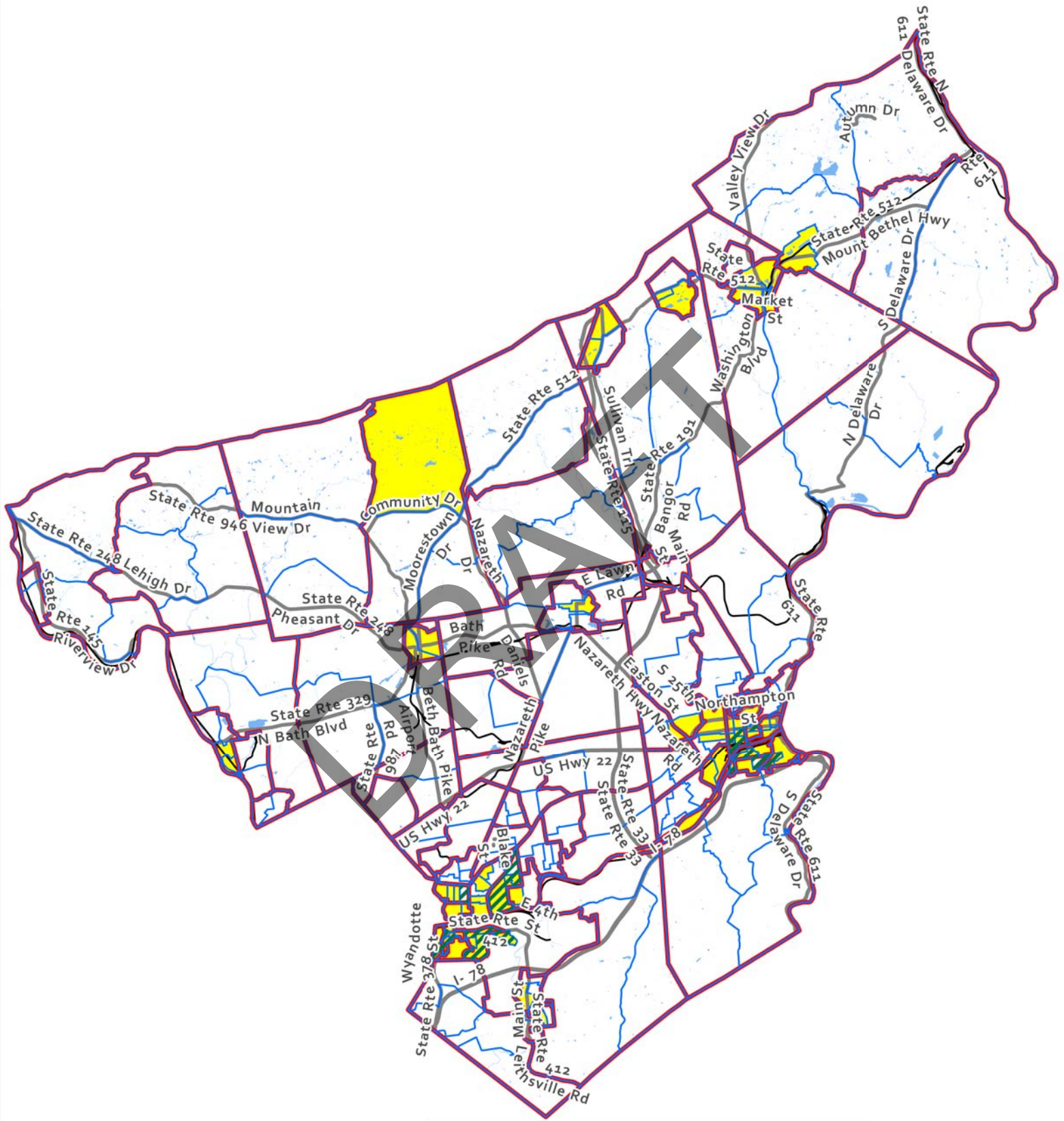
Source: 2013-2017  
ACS 5-Year Estimates

0 1 2 4 6 8  
Miles



# NORTHAMPTON COUNTY, PA MINORITY POPULATION AND CDBG ELIGIBLE CENSUS BLOCK GROUPS

**BUILT ON EXPERIENCE**  
**URBAN  
DESIGN  
VENTURES**



0 1 2 4 6 8  
Miles

## LEGEND:

- Census Tracts
- Block Groups
- Major Roads
- Railroads
- Rivers

## Block Group Parts by Minority and Low/Moderate Income Percentage

- Less than 46.57%
- 46.58% or More
- Minority Population of 50 Percent or More

Source: 2013-2017  
ACS 5-Year Estimates

## **VIII. Appendix**

The following documents are attached:

- U.S. Census Data
- CHAS Data
- HMDA Data
- Citizen Participation

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# U.S. Census Data

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## CHAS Data

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## HMDA Data

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# Citizen Participation

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