

# Executive Summary

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

### 1. Introduction

The City of Bethlehem, Pennsylvania, has prepared a Five-Year Consolidated Plan to identify housing and community development needs and to develop specific goals and objectives to address those needs over a five-year period. The Five-Year Consolidated Plan for the City covers the period of January 1, 2015, until December 31, 2019. The Annual Action Plan presented here covers the fifth year of this 5-year period, specifically from January 1, 2019 to December 31, 2019.

The Annual Action Plan sets forth the goals and objectives for the period and is a continuation of efforts begun in during the first four years of the 5-year cycle to address needs identified in the current Consolidated Plan. More specifically, this Annual Action Plan details the City's planned use of Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds provided by the U.S. Department of Housing and Urban Development (HUD).

The 2015-2019 Consolidated Plan stipulates that the City's Department of Community and Economic Development will administer the community development programs for the CDBG and HOME Programs.

The FY 2019 Annual Action Plan describes to HUD and to our stakeholders how the City of Bethlehem intends to use federal and non-federal resources to meet community needs. The funds are intended to provide low and moderate-income households with viable communities by addressing one of HUD's three objectives; 1. Provide decent housing, 2. Create a suitable living environment, and 3. Create economic opportunities. Eligible activities include community facilities and improvements, roads and infrastructure, housing rehabilitation and preservation, development activities, public services, economic development, planning and administration.

Program outcomes are designed to show how each activity benefits the community or people served. All activities must provide one of the following benefits; 1. Improved Availability / Accessibility, 2. Improved Affordability or 3. Improved Sustainability.

Community Development Block Grant funds allocated to Bethlehem in 2019 to address the needs outlined in this Plan are \$1,335,744 in 2019 CDBG funding. Additionally \$400,054 in 2019 HOME funds has been allocated to Bethlehem, which also anticipates \$150,000 in HOME program income.

### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

All activities funded in the 2019 Program Year will support at least one objective and one outcome.

1. Promote the development of new homeownership through homebuyers assistance, new construction and substantial rehabilitation/sale of housing units
2. Preserve existing housing through the Housing Rehabilitation Program
3. Support activities that address the needs of the Homeless and Non-homeless Special Needs Populations
4. Maintain and improve the infrastructure including water, sewer, streets, sidewalks, storm water facilities
5. Maintain and improve public facilities including parks and recreation facilities; make handicap accessibility improvements as needed
6. Develop economic opportunities for low income residents through investments in existing and new commercial businesses that create jobs
7. Ensure that quality public services in support of youth development, public health, employment and housing needs are available to low income residents
8. Reduce blight
9. Continue Administration and Management activities, including Fair Housing

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

One of the primary criteria for selecting projects for this plan is the track record of the City department or third-party partner in completing previous projects in an efficient, effective manner that uses funds in a timely manner to produce results that meet identified community needs.

Based on the impact of these projects, the 2019 Plan includes the continuation of several successful efforts, including fair housing activities, housing rehabilitation, street and park improvements, crime prevention activities and services for seniors and for youth.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The City conducted four public hearings and met with City staff to solicit input into the preparation of the 2019 Annual Action Plan. The meetings were advertised in The Morning Call. The public hearings

were held at Town Hall, two on October 16, 2018 to solicit public input on City needs, and two on April 24, 2019 on the draft 2019 Annual Action Plan.

Copies of the draft 2019 Action Plan were available to the public for review and comment at the Community Development Office in Town Hall and at the Bethlehem Public Library for 30 days starting April 24, 2019.

On October 8, 2018, the Community Development Committee of City Council held a public meeting to review the CDBG/HOME proposals and proposed funding recommendations. On October 29, 2018 the second public hearing was conducted to provide the general public with the opportunity to comment on the Plans and proposed 2019 budget. These actions took place following the announcement of the 2019 allocations and so were based on actual entitlement grant amounts rather than on estimates.

Bethlehem City Council approved the 2019 Action Plan on November 2, 2018 for submission to HUD.

## **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

No public comments were received during the review period or at any public hearings.

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

No comments were received.

## **7. Summary**

The City of Bethlehem believes it has developed a workable Annual Action Plan for the use of HUD and other resources to address identified needs among our City's residents, particularly its low- and moderate-income residents.

Built on past successes, mutually beneficial partnerships and a continued dedication to efficient administration, this plan combines the resources of a community into an effort that will improve neighborhoods, opportunities and lives. While no undertaking is entirely risk-free, it is the aim of the activities described in this plan to individually and collectively turn promise and hope into action and results.

Like so many places, Bethlehem struggles to help its residents cope with economic realities that seem beyond anyone's control. Through advances and setbacks, though, Bethlehem and its residents keep striving. This plan represents an important piece of that effort.

**PR-05 Lead & Responsible Agencies – 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

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

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

**Table 1 – Responsible Agencies**

**Narrative (optional)**

The City of Bethlehem Department of Community and Economic Development administers both the CDBG and HOME programs. Administrative support also comes from the Department of Business Administration and Financial Services.

**Consolidated Plan Public Contact Information**

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

The City of Bethlehem has prepared a Five-Year Consolidated Plan for the Years 2015 through 2019 in order to strategically implement federal programs that fund housing, community development and economic development activities within the City. This, the 2019 Annual Action Plan, is the fifth annual plan under the 5-year Consolidated Plan.

Through a collaborative planning process that involved a broad range of public and private agencies, the City identified community needs and developed a plan for addressing those needs with federal entitlement funds available through the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Programs. The City of Bethlehem will submit this 2019 Annual Action Plan to the U. S. Department of Housing and Urban Development (HUD).

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

The City conducted four public hearings to solicit input into the preparation of the 2019 Annual Action Plan and for input on the draft of that plan. To further involve the public in the process the City Council's Community Development (CD) Committee held a public meeting to review the budget and activities proposed in the 2019 Action Plan.

All public and assisted housing providers as well as mental health and service agencies were apprised of those hearings and invited to participate.

The City conducted four public hearings and met with City staff to solicit input into the preparation of the 2019 Annual Action Plan. The meetings were advertised in [The Morning Call](#). The public hearings were held at Town Hall, two on October 29, 2018 to solicit public input on City needs, and two on April 24, 2019 on the draft 2019 Annual Action Plan.

Copies of the draft 2019 Action Plan were available to the public for review and comment at the Community Development Office in Town Hall and at the Bethlehem Public Library for 30 days starting April 24, 2019.

On October 8, 2018, the Community Development Committee of City Council held a public meeting to review the CDBG/HOME proposals and proposed funding recommendations. On October 16, 2018, he second public hearing was conducted to provide the general public with the opportunity to comment on the Plan and proposed 2019 budget.

Bethlehem City Council approved the 2019 Action Plan on November 2, 2018 for submission to HUD.

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

The City of Bethlehem participates in the Lehigh Valley Regional Homeless Advisory Board, which is charged with devising a community plan meant to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximum self-sufficiency. This group then informs the Eastern PA Continuum of Care which implements specific regional projects.

Each year, a Point-in-Time Count is made of the persons residing in shelter and transitional housing facilities and living unsheltered in each county. No data is collected specific to the City of Bethlehem.

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

The City of Bethlehem does not receive ESG funds.

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

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	The Salvation Army (Bethlehem Corps)
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
2	<b>Agency/Group/Organization</b>	EPISCOPAL MINISTRIES OF THE DIOCESE OF BETHLEHEM, INC./D.B.A. New Bethany Ministries
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.

3	<b>Agency/Group/Organization</b>	Neighborhood Housing Services of the Lehigh Valley, Inc.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
4	<b>Agency/Group/Organization</b>	Habitat for Humanity of the Lehigh Valley
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.

5	<b>Agency/Group/Organization</b>	City of Bethlehem Health Bureau
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Health Agency Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Lead-based Paint Strategy Community Development Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
6	<b>Agency/Group/Organization</b>	Bethlehem Area Public Library
	<b>Agency/Group/Organization Type</b>	Housing Services-homeless Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Community Development Needs - ADA accessibility

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
7	<b>Agency/Group/Organization</b>	City of Bethlehem Department of Community and Economic Development
	<b>Agency/Group/Organization Type</b>	Other government - Local Planning organization Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
8	<b>Agency/Group/Organization</b>	City of Bethlehem Department of Planning and Zoning
	<b>Agency/Group/Organization Type</b>	Other government - Local Planning organization Grantee Department

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
9	<b>Agency/Group/Organization</b>	Community Action Committee of the Lehigh Valley, Inc.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
10	<b>Agency/Group/Organization</b>	Lehigh Valley Land Trust
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
11	<b>Agency/Group/Organization</b>	Share Care Faith in Action
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Services-Health Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
12	<b>Agency/Group/Organization</b>	Community Action Development Corporation of Bethlehem
	<b>Agency/Group/Organization Type</b>	Services-Education Services-Employment Business development Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
13	<b>Agency/Group/Organization</b>	City of Bethlehem Department of Parks and Public Property
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Other government - Local Public facilities and infrastructure Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Community Development Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
14	<b>Agency/Group/Organization</b>	Hispanic Center of the Lehigh Valley
	<b>Agency/Group/Organization Type</b>	Services-Health Services-Education Services-Employment Civic Leaders Neighborhood Organization

	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
15	<b>Agency/Group/Organization</b>	LEHIGH VALLEY CENTER FOR INDEPENDENT LIVING (LVCIL)
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
16	<b>Agency/Group/Organization</b>	Bethlehem YMCA
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
17	<b>Agency/Group/Organization</b>	MORAVIAN DEVELOPMENT CORPORATION
	<b>Agency/Group/Organization Type</b>	Housing Services-Elderly Persons Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
18	<b>Agency/Group/Organization</b>	North Penn Legal Services
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing Services - Victims Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Fair housing

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
19	<b>Agency/Group/Organization</b>	Southside Vision
	<b>Agency/Group/Organization Type</b>	Housing Services-Employment Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
20	<b>Agency/Group/Organization</b>	Bethlehem Emergency Sheltering, Inc.
	<b>Agency/Group/Organization Type</b>	Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
21	<b>Agency/Group/Organization</b>	Hogar Crea - Bethlehem
	<b>Agency/Group/Organization Type</b>	Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Public services
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing dialogue between the organization and the City's Community Development Program. Additionally, the City held four public hearings to seek input into the Annual Action Plan. The City also solicited applications from a variety of organizations and asked for a needs discussion as part of the application.
22	<b>Agency/Group/Organization</b>	Northampton County Department of Corrections
	<b>Agency/Group/Organization Type</b>	Services - Housing Publicly Funded Institution/System of Care Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participates on the Regional Homeless Advisory Board with the Reentry Coordinator for the Department of Corrections. The DOC and City discuss housing needs of those leaving prison and how we can secure stable housing within the city for this population.

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

All relevant types of agencies were included in the consultation process associated with the development of this plan.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Lehigh Valley Regional Homeless Advisory Board	The City of Bethlehem and the Lehigh Valley Regional Housing Advisory Board (LVRHAB) work together with other municipalities and interest groups on similar issues pertaining to homelessness. Jointly, they are effectively addressing: homeless prevision; outreach/assessment of homelessness; emergency services for the homeless; and transitional housing for the homeless.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

As with many grantees, the City of Bethlehem has found it very difficult to receive citizen input through the formal planning process. Of course, there were public hearings held and advertised. A total of four public hearings were held. As often happens, no members of the public attended any of the hearings.

There are ways to obtain community input, though, outside of the formal hearing process. Through involvement with individual agencies, committees and working groups of providers, a community development staff maintains an ongoing dialogue on its residents' needs. Non-profits applying for CDBG funds often capture the community's needs in their application narratives. By paying attention to participation levels in activities; by observing gaps in services and resources; by listening to the many informal ways that a constituency expresses itself, a caring, attentive community development staff knows what's working, what isn't and what adjustments are needed. Bethlehem's community development staff heeded all of the many forms of community input in developing goals for the 2019 Action Plan.

The draft Action Plan and final public review hearing took place after the announcement of 2019 CDBG and HOME allocations. Unlike prior years, then, no contingency planning was included in the draft plan because actual funding amounts were used.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Hearing	Non-targeted/broad community	A total of 4 public hearings were held, 2 in the fall of 2018 and 2 in April 2019. No members of the public attended or submitted any written comments	None	None	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

In addition to the entitlement grant amounts announced by HUD, the City of Bethlehem brings a wide variety of resources and effort to bear on addressing the community's needs. All potential funding sources - state, federal and private - are investigated and pursued as appropriate. The City has several million dollars in applications pending to further redevelop some of the same low-moderate income areas being aided with CDBG funds as well as the adjoining commercial areas that must play a significant role in ongoing efforts to improve the quality of life for all of our residents.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,335,744	0	0	1,335,744	0	Because this is the final year of the current five-year Consolidated Plan, no additional funding is anticipated.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	400,540	150,000	0	550,540	450,000	Because this is the final year of the current five-year Consolidated Plan, no additional funding is anticipated
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	0	0	0	0	0	

Table 5 - Expected Resources – Priority Table

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



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

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

**Discussion**

While available resources are insufficient to meet all needs, careful monitoring, diligent leveraging and ongoing coordination helps the City of Bethlehem assure that its residents receive the most benefit from the CDBG and HOME funding received.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase home ownership opportunities	2015	2019	Affordable Housing	City of Bethlehem	First Time Homeownership Assistance	HOME: \$225,000	Homeowner Housing Added: 40 Household Housing Unit
2	Increase understanding/compliance w/ Fair Housing	2015	2019	Affordable Housing	City of Bethlehem	Planning & Administration	CDBG: \$17,500	Public service activities for Low/Moderate Income Housing Benefit: 20 Households Assisted
3	Increase Services for Homeless and Special Needs	2015	2019	Homeless Non-Homeless Special Needs	City of Bethlehem	Public Services to Special Needs Population	CDBG: \$18,000	Public service activities for Low/Moderate Income Housing Benefit: 35 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Support Public Services	2015	2019	Non-Homeless Special Needs Public Safety	Low Mod Neighborhoods City of Bethlehem	Youth, Health and Public Safety Services Public Services to Special Needs Population Public Services for the Homeless & At- Risk	CDBG: \$164,800	Public service activities other than Low/Moderate Income Housing Benefit: 15620 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 20 Households Assisted
5	Improvements to Public Facilities & Infrastructure	2015	2019	Non-Housing Community Development	Low Mod Neighborhoods City of Bethlehem	Maintain/Improve Public Facilities &Infrastructure	CDBG: \$464,500	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 27220 Persons Assisted
6	Improve the condition of owner occupied housing	2015	2019	Affordable Housing	City of Bethlehem	Rehabilitation of the Existing Housing Stock	CDBG: \$398,799 HOME: \$130,486	Homeowner Housing Rehabilitated: 28 Household Housing Unit
7	Administer CDBG & HOME programs	2015	2019	Administration & Planning	City of Bethlehem	Planning & Administration	CDBG: \$257,145 HOME: \$40,054	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Economic Development and Job Creation	2016	2019	Economic Development	City of Bethlehem	Develop Economic Opportunities	CDBG: \$22,500	Jobs created/retained: 1 Jobs Businesses assisted: 5 Businesses Assisted

Table 6 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Increase home ownership opportunities
	<b>Goal Description</b>	The City intends to assist the Lehigh Valley Community Land Trust with the City Lights development consisting of 36 mixed-income residential units. (\$100,000 in HOME funds.) HOME-assisted unit will be sold to HOME-eligible families. HOME funds (\$125,000) will also be used for a Habitat for Humanity project to construct 4 affordable homebuyer units.
2	<b>Goal Name</b>	Increase understanding/compliance w/ Fair Housing
	<b>Goal Description</b>	<i>The City plans to support the efforts of North Penn Legal in promoting and affirmatively furthering Fair Housing.</i>
3	<b>Goal Name</b>	Increase Services for Homeless and Special Needs
	<b>Goal Description</b>	The City intends to support the Lehigh Valley Center for Independent Living's program to help disabled residents find suitable housing (Project # 3).

4	<b>Goal Name</b>	Support Public Services
	<b>Goal Description</b>	The City intends to support a number of public services offering a wide range of activities. These include: Hogar Crea (Project #2), Community Policing (Project #4), YMCA TechGyrls (Project #5), ShareCare (Project #6), New Bethany Representative Payee Program (Project #7), Summer youth programming (Project #8), Salvation Army rental assistance (Project #18) and Center for Humanistic Change mentoring program (Project #20).
5	<b>Goal Name</b>	Improvements to Public Facilities & Infrastructure
	<b>Goal Description</b>	The City intends to support facility and infrastructure improvements, including: Street reconstruction (Project #9), Park improvements (Project #10), Bethlehem Food Co-op facilities (Project #13), YMCA renovations (Project #15) and Hispanic Center demolition and clearance (Project # 19).
6	<b>Goal Name</b>	Improve the condition of owner occupied housing
	<b>Goal Description</b>	Owner-occupied units to be improved through the City's Housing Rehab Program (Project #11) and the South Side Vision exterior improvements program (Project #17).
7	<b>Goal Name</b>	Administer CDBG & HOME programs
	<b>Goal Description</b>	Administration and planning costs for both the CDBG and HOME programs, including all planning, implementation, monitoring and reporting. (Project #1). Fair Housing costs listed under a separate goal.
8	<b>Goal Name</b>	Economic Development and Job Creation
	<b>Goal Description</b>	To be carried out through operating support for the Bethlehem Food Co-op (Project #14) and contractor training for participation in the City's housing rehab program (Project #16).

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

With input from a variety of stakeholders, with data from a variety of sources and with hands-on experience in front-line services to the most vulnerable populations in the City, Bethlehem again plans a mix of activities in FY 2017 to address a wide range of challenges for those populations. Infrastructure improvements, housing rehab, recreation facilities and programming and support for public facilities improvements are just some of the approaches to improving neighborhoods, houses and, most importantly, families in Bethlehem. Applications for funding are made available around July of each year. These applications are available on our website, at City Hall and are also directly emailed to organizations that have requested funding during the previous program year and remain interested in future funding. The city keeps a list of new and interested organizations that are in contact during the year and directly mails applications to these groups as well. The applications are due back in September, when a small internal committee scores the applications based on the quality of the project, the need for the project in the city, if the project is duplicative of another existing project, value of the resources versus the number of residents served and alignment with the city's goals and objectives. Funding is awarded based on our anticipated award, level of impact on residents and need for the program. The suggested allocations are then sent to both the Mayor and City Council for final approval.

### Projects

#	Project Name
1	General Administration & Planning - 2019
2	Hogar Crea - 2019
3	LV Center for Independent Living - PLACE program 2019
4	Police Department - community safety - 2019
5	YWCA - TechGyrls - 2019
6	ShareCare - 2019
7	New Bethany Representative Payee - 2019
8	Summer Youth Programs - 2019
9	Street reconstruction - 2019
10	Park Improvements - 2019
11	Housing rehab - 2019
12	HOOP - 2019
13	Bethlehem Food Co-op - facilities
14	Bethlehem Food Co-op - operations

#	Project Name
15	YMCA building renovations - 2019
16	Community Action Development Corp. - contractor training
17	South Side Vision - 2019
18	Salvation Army - rental assistance
19	Hispanic Center - demolition
20	Center for Humanistic Change
21	Habitat homebuyer - 2019
22	CDCLV homebuyer - 2019

**Table 7 - Project Information**

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

**AP-38 Project Summary**  
**Project Summary Information**

<b>1</b>	<b>Project Name</b>	General Administration & Planning - 2019
	<b>Target Area</b>	City of Bethlehem
	<b>Goals Supported</b>	Increase understanding/compliance w/ Fair Housing Administer CDBG & HOME programs
	<b>Needs Addressed</b>	Planning & Administration
	<b>Funding</b>	CDBG: \$267,145 HOME: \$40,054
	<b>Description</b>	Administration and planning of CDBG and HOME programs, including planning, fair housing activities, consultant services, monitoring and reporting. Also includes \$10,000 to Bethlehem Redevelopment Authority for management of commercial and residential loans.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Thousands of low and moderate-income residents throughout Bethlehem will benefit from the activities provided through the administration of the CDBG and HOME programs.
	<b>Location Description</b>	10 E. Church St., Bethlehem, PA
	<b>Planned Activities</b>	Administration and planning of CDBG and HOME programs, including planning, fair housing activities, consultant services, monitoring and reporting.
<b>2</b>	<b>Project Name</b>	Hogar Crea - 2019
	<b>Target Area</b>	City of Bethlehem
	<b>Goals Supported</b>	Support Public Services
	<b>Needs Addressed</b>	Youth, Health and Public Safety Services
	<b>Funding</b>	CDBG: \$30,000
	<b>Description</b>	Operating support for a drug and alcohol counseling service.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	10 individuals, most of whom will be low-mod income.
	<b>Location Description</b>	1920 Market St., Bethlehem, PA

	<b>Planned Activities</b>	Operating support for a drug and alcohol counseling service.
<b>3</b>	<b>Project Name</b>	LV Center for Independent Living - PLACE program 2019
	<b>Target Area</b>	City of Bethlehem
	<b>Goals Supported</b>	Increase Services for Homeless and Special Needs
	<b>Needs Addressed</b>	Public Services for the Homeless & At-Risk
	<b>Funding</b>	CDBG: \$18,000
	<b>Description</b>	Support for program that provides housing search and supportive services for residents with disabilities who are homeless or at-risk of homelessness. Specializes in locating accessible housing and supportive case management.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 35 disabled adults.
	<b>Location Description</b>	Office located at 713 N. 13th St., Allentown, PA. Services provided throughout the Lehigh Valley, including all of Bethlehem.
<b>Planned Activities</b>	Support for program that provides housing search and supportive services for residents with disabilities who are homeless or at-risk of homelessness. Specializes in locating accessible housing and supportive case management.	
<b>4</b>	<b>Project Name</b>	Police Department - community safety - 2019
	<b>Target Area</b>	Low Mod Neighborhoods
	<b>Goals Supported</b>	Support Public Services
	<b>Needs Addressed</b>	Youth, Health and Public Safety Services
	<b>Funding</b>	CDBG: \$65,000
	<b>Description</b>	Overtime for police patrols in income-eligible residential neighborhoods.
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	A minimum of 15,000 residents of income-eligible residential areas.
	<b>Location Description</b>	Income-eligible residential areas throughout Bethlehem, though largely on the South Side.
	<b>Planned Activities</b>	Overtime for police patrols in income-eligible residential neighborhoods.
<b>5</b>	<b>Project Name</b>	YWCA - TechGyrls - 2019
	<b>Target Area</b>	City of Bethlehem
	<b>Goals Supported</b>	Support Public Services
	<b>Needs Addressed</b>	Youth, Health and Public Safety Services
	<b>Funding</b>	CDBG: \$5,000
	<b>Description</b>	After-school educational program for elementary school girls.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	90 girls, the majority of whom will be from low-mod income families.
	<b>Location Description</b>	5 Bethlehem elementary schools
	<b>Planned Activities</b>	After-school educational program for elementary school girls.
<b>6</b>	<b>Project Name</b>	ShareCare - 2019
	<b>Target Area</b>	City of Bethlehem
	<b>Goals Supported</b>	Support Public Services
	<b>Needs Addressed</b>	Public Services to Special Needs Population
	<b>Funding</b>	CDBG: \$10,000
	<b>Description</b>	Support for non-profit agency that provides seniors with transportation, help with shopping, medical appointments, chores and other activities and provides respite care for seniors' family members.
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 200 senior residents.
	<b>Location Description</b>	Office at 323 Wyandotte St., Bethlehem. Services provided throughout Bethlehem.
	<b>Planned Activities</b>	Support for non-profit agency that provides seniors with transportation, help with shopping, medical appointments, chores and other activities and provides respite care for seniors' family members.
<b>7</b>	<b>Project Name</b>	New Bethany Representative Payee - 2019
	<b>Target Area</b>	City of Bethlehem
	<b>Goals Supported</b>	Support Public Services
	<b>Needs Addressed</b>	Public Services for the Homeless & At-Risk
	<b>Funding</b>	CDBG: \$20,300
	<b>Description</b>	This program provides financial management services to adults who are struggling with mental health problems and/or are unable to manage their finances.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	At least 20 low-mod, senior and disabled residents.
	<b>Location Description</b>	339 W. Fourth St., Bethlehem, PA
	<b>Planned Activities</b>	This program provides financial management services to adults who are struggling with mental health problems and/or are unable to manage their finances.
<b>8</b>	<b>Project Name</b>	Summer Youth Programs - 2019
	<b>Target Area</b>	Low Mod Neighborhoods
	<b>Goals Supported</b>	Support Public Services
	<b>Needs Addressed</b>	Youth, Health and Public Safety Services
	<b>Funding</b>	CDBG: \$10,000

	<b>Description</b>	Support for recreational activities in city parks serving low-moderate income areas.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	At least 100 youth from low-moderate income families.
	<b>Location Description</b>	Parks and recreational facilities in low-mod income areas throughout Bethlehem, focusing on the South Side.
	<b>Planned Activities</b>	Support for recreational activities in city parks serving low-moderate income areas.
<b>9</b>	<b>Project Name</b>	Street reconstruction - 2019
	<b>Target Area</b>	Low Mod Neighborhoods
	<b>Goals Supported</b>	Improvements to Public Facilities & Infrastructure
	<b>Needs Addressed</b>	Maintain/Improve Public Facilities &Infrastructure
	<b>Funding</b>	CDBG: \$300,000
	<b>Description</b>	Street reconstruction projects in income-eligible residential areas in Bethlehem.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Although specific locations have not been selected, it is safe to say that a minimum of 15,000 residents in low-mod income areas will benefit from this activity.
	<b>Location Description</b>	Specific sites to be determined. They will be in eligible low-mod residential areas
	<b>Planned Activities</b>	Street reconstruction projects in income-eligible residential areas in Bethlehem.
<b>10</b>	<b>Project Name</b>	Park Improvements - 2019
	<b>Target Area</b>	Low Mod Neighborhoods
	<b>Goals Supported</b>	Improvements to Public Facilities & Infrastructure
	<b>Needs Addressed</b>	Maintain/Improve Public Facilities &Infrastructure
	<b>Funding</b>	CDBG: \$30,000

	<b>Description</b>	Improvements to public parks serving income-eligible residential areas.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	At least 2,000 residents of low-mod income areas.
	<b>Location Description</b>	Specific sites to be determined. They will be located in income-eligible residential areas.
	<b>Planned Activities</b>	Improvements to public parks serving income-eligible residential areas.
<b>11</b>	<b>Project Name</b>	Housing rehab - 2019
	<b>Target Area</b>	City of Bethlehem
	<b>Goals Supported</b>	Improve the condition of owner occupied housing
	<b>Needs Addressed</b>	Rehabilitation of the Existing Housing Stock
	<b>Funding</b>	CDBG: \$368,799 HOME: \$130,486
	<b>Description</b>	Loans for needed repairs to residential units occupied by income-eligible households. Includes \$319,285 (\$188,799 CDBG and \$130,486 HOME) for rehab loans and \$180,000 for project delivery (CDBG).
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	25 families at or below 80% of the Area Median Income.
	<b>Location Description</b>	Operated out of 10 E. Church St., Bethlehem, PA. Program available citywide with exact locations to be determined.
	<b>Planned Activities</b>	Residential rehab, including outreach, intake, eligibility verification, spec writing, site inspections and documentation.
<b>12</b>	<b>Project Name</b>	HOOP - 2019
	<b>Target Area</b>	City of Bethlehem
	<b>Goals Supported</b>	Increase home ownership opportunities
	<b>Needs Addressed</b>	First Time Homeownership Assistance
	<b>Funding</b>	HOME: \$170,000

	<b>Description</b>	Home Ownership Opportunity Program to provide loans for eligible first-time home buyers to assist with down payment and closing costs. Includes \$20,000 for project delivery costs.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	10 families at or below 80% of Area Median Income.
	<b>Location Description</b>	Operated out of 10 E. Church St., Bethlehem, properties being purchased will be throughout the City.
	<b>Planned Activities</b>	Loans to eligible families becoming first-time homebuyers.
<b>13</b>	<b>Project Name</b>	Bethlehem Food Co-op - facilities
	<b>Target Area</b>	Low Mod Neighborhoods
	<b>Goals Supported</b>	Improvements to Public Facilities & Infrastructure
	<b>Needs Addressed</b>	Develop Economic Opportunities
	<b>Funding</b>	CDBG: \$50,000
	<b>Description</b>	Assistance with improvements at a community-owned grocery store in downtown Bethlehem.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	While the location has yet to be determined, it is safe to assume that a minimum of 5,000 residents, primarily in low-mod income residential areas, will benefit from this project.
	<b>Location Description</b>	To be determined.
	<b>Planned Activities</b>	Assistance with the renovation of a facility to serve as a community-owned grocery store in downtown Bethlehem.
<b>14</b>	<b>Project Name</b>	Bethlehem Food Co-op - operations
	<b>Target Area</b>	City of Bethlehem
	<b>Goals Supported</b>	Economic Development and Job Creation
	<b>Needs Addressed</b>	Develop Economic Opportunities
	<b>Funding</b>	CDBG: \$7,500

	<b>Description</b>	Operating support for a community-owned grocery store in downtown Bethlehem.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Support for at least 1 job available to low-mod income residents.
	<b>Location Description</b>	To be determined.
	<b>Planned Activities</b>	Operating support for a community-owned grocery store in downtown Bethlehem.
<b>15</b>	<b>Project Name</b>	YMCA building renovations - 2019
	<b>Target Area</b>	City of Bethlehem
	<b>Goals Supported</b>	Improvements to Public Facilities & Infrastructure
	<b>Needs Addressed</b>	Maintain/Improve Public Facilities & Infrastructure
	<b>Funding</b>	CDBG: \$34,500
	<b>Description</b>	Assistance with improvements to the YMCA building, which houses community services, including child care.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	At least 5,000 individuals use the community center portion of the Y each year, 70% of whom are low-mod income.
	<b>Location Description</b>	430 E. Broad St., Bethlehem
	<b>Planned Activities</b>	Assistance with improvements to the YMCA building, which houses community services, including child care.
<b>16</b>	<b>Project Name</b>	Community Action Development Corp. - contractor training
	<b>Target Area</b>	City of Bethlehem
	<b>Goals Supported</b>	Economic Development and Job Creation
	<b>Needs Addressed</b>	Develop Economic Opportunities
	<b>Funding</b>	CDBG: \$15,000

	<b>Description</b>	Support for a program to train local contractors to participate in the City's housing rehab program.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 local businesses, some of whom may be Section 3 or MBE/WBE companies.
	<b>Location Description</b>	409 E. Fourth St., Bethlehem, PA
	<b>Planned Activities</b>	Support for a program to train local contractors to participate in the City's housing rehab program.
<b>17</b>	<b>Project Name</b>	South Side Vision - 2019
	<b>Target Area</b>	City of Bethlehem
	<b>Goals Supported</b>	Improve the condition of owner occupied housing
	<b>Needs Addressed</b>	Rehabilitation of the Existing Housing Stock
	<b>Funding</b>	CDBG: \$30,000
	<b>Description</b>	A weatherization and exterior improvements program for eligible residential properties throughout Bethlehem, though it is expected that the majority of the properties will be in the lower-income areas, which are concentrated in South Bethlehem. Energy efficiency and aesthetic improvements to residential neighborhoods are the primary goals.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	3 families, all at 80% or below of Area Median Income
	<b>Location Description</b>	Specific locations to be determined.
	<b>Planned Activities</b>	Outreach, intake, work scopes, monitoring and reporting on improvements to 3 properties.
<b>18</b>	<b>Project Name</b>	Salvation Army - rental assistance
	<b>Target Area</b>	City of Bethlehem
	<b>Goals Supported</b>	Support Public Services
	<b>Needs Addressed</b>	Public Services for the Homeless & At-Risk

	<b>Funding</b>	CDBG: \$17,000
	<b>Description</b>	Rental assistance for eligible households.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	20 families at 80% or less of Area Median Income.
	<b>Location Description</b>	521 Pembroke Road, Bethlehem, PA
	<b>Planned Activities</b>	Rental assistance for eligible households.
<b>19</b>	<b>Project Name</b>	Hispanic Center - demolition
	<b>Target Area</b>	City of Bethlehem
	<b>Goals Supported</b>	Improvements to Public Facilities & Infrastructure
	<b>Needs Addressed</b>	Maintain/Improve Public Facilities & Infrastructure
	<b>Funding</b>	CDBG: \$50,000
	<b>Description</b>	Demolition and clearance of a vacant residential structure on the property of a non-profit agency that primarily serves low-mod income residents. Project will allow for future expansion of the current facility.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	At least 220 low to moderate income Bethlehem residents currently served by the Center plus more once expansion plans are completed.
	<b>Location Description</b>	520 E. Fourth St., Bethlehem, PA.
	<b>Planned Activities</b>	Demolition and clearance of a vacant residential structure on the property of a non-profit agency that primarily serves low-mod income residents. Project will allow for future expansion of the current facility.
<b>20</b>	<b>Project Name</b>	Center for Humanistic Change
	<b>Target Area</b>	City of Bethlehem
	<b>Goals Supported</b>	Support Public Services
	<b>Needs Addressed</b>	Youth, Health and Public Safety Services
	<b>Funding</b>	CDBG: \$7,500

	<b>Description</b>	Support for a mentoring program for Northeast Middle School students.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 200 middle school students, the majority of whom will be from low-mod income families.
	<b>Location Description</b>	Northeast Middle School, 1170 Fernwood St., Bethlehem, PA.
	<b>Planned Activities</b>	Support for a mentoring program for Northeast Middle School students.
<b>21</b>	<b>Project Name</b>	Habitat homebuyer - 2019
	<b>Target Area</b>	City of Bethlehem
	<b>Goals Supported</b>	Increase home ownership opportunities
	<b>Needs Addressed</b>	First Time Homeownership Assistance
	<b>Funding</b>	HOME: \$120,000
	<b>Description</b>	Creation of 2 housing units for sale to families at 80% or less of Area Median Income.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2 families, both at 80% or less of Area Median Income.
	<b>Location Description</b>	Williams Street in Bethlehem, PA.
	<b>Planned Activities</b>	Creation of 2 housing units for sale to families at 80% or less of Area Median Income.
<b>22</b>	<b>Project Name</b>	CDCLV homebuyer - 2019
	<b>Target Area</b>	City of Bethlehem
	<b>Goals Supported</b>	Increase home ownership opportunities
	<b>Needs Addressed</b>	Rehabilitation of the Existing Housing Stock
	<b>Funding</b>	HOME: \$90,000
	<b>Description</b>	Rehabilitation of housing units for sale to income-eligible families.
	<b>Target Date</b>	12/31/2020

<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2 families at or below 80% Area Median Income
<b>Location Description</b>	To be determined.
<b>Planned Activities</b>	Rehabilitation of housing units for sale to income-eligible families.

## **AP-50 Geographic Distribution – 91.220(f)**

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

Most activities included in the 2019 Annual Action Plan will be available in income-eligible residents from throughout Bethlehem, which is primarily a low-mod income City (50.61% per HUD's latest estimates). Most are eligible based on serving a limited clientele, where presumed benefit status or actual income levels will be documented.

Approximately 24% of 2019 CDBG and HOME funding combined will be targeted to service areas where low-mod income residents make up at least 51% of the population. These activities include facilities and infrastructure improvements and community policing.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Low Mod Neighborhoods	24
City of Bethlehem	76

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

The geographic distribution described above allows Bethlehem to adhere to its funding allocation principals, specifically:

- \* abiding by CDBG and HOME regulations
- \* putting the most resources where the greatest need is
- \* using resources in the most efficient and effective manner.

### **Discussion**

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

Affordable Housing activities in FY2019 include: rehab of owner-occupied units and construction of new homebuyer units; homebuyer assistance. While housing services are also included in the 2019 Action Plan, those activities are not included in this section per the instructions found in the e-Con Planning Suite Desk Guide. The goals listed below include only the rehab or construction of housing units and purchase of units. These goals include: owner-occupied rehab - 25 units of full rehab plus 3 units of exterior only rehab; Habitat for Humanity - 2 affordable for sale units; Community Development Corporation of the Lehigh Valley - 2 affordable for sale units; Home Ownershipt Opportunity Program - 10 direct homebuyer assistance units.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	42
Special-Needs	0
Total	42

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	32
Acquisition of Existing Units	10
Total	42

**Table 10 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

This mix of activities is a necessary and effective way of dealing with the multi-faceted challenges of providing sufficient affordable housing for Bethlehem's residents.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The following are direct responses from the Bethlehem Housing Authority.

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

The Bethlehem Housing Authority reports that almost all complexes are in good condition, with a few considered fair. The BHA will continue annually to make improvements to complexes in general and housing units where needed to guarantee a safe, decent home for each resident.

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

Since the passing of “The Quality Housing and Work Responsibility Act of 1998”, the Bethlehem Housing Authority has had a Resident Advisory Board, comprised of a representative from each development/ building. The Board members meet monthly to assist the Authority in preparation and updating of the Five Year and Annual Plans.

The Bethlehem Housing Authority encourages and funds Resident Councils in all of their developments/ buildings. The resident Council members are voted by the residents in an election process which is overseen by Housing Authority staff. Councils are required to hold meetings and set up information sessions that are of interest and importance to the residents. A meeting with Health Care Providers / Agencies is a popular topic.

Representatives from the City receive all BHA meeting agendas and minutes and review all to become familiar with concerns of the board and, more importantly, the resident advisory board. We supply information regarding HOME funded units to the Director and have requested our HOME funded organizations directly solicit residents of the BHA when marketing their apartment units or income qualified homes.

Information on the City's Home Ownership Opportunity Program (HOOP) will be provided to Housing Authority residents.

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

The Bethlehem Housing Authority is not troubled.

### **Discussion**

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

### **Introduction**

The City of Bethlehem continues to cooperate with various social agencies, low-income housing advocates and affordable housing providers to address the underserved needs of area residents. Through the City's continued participation in regional housing forums, most notably the Lehigh Valley Local Housing Option Team, Bethlehem works with service providers, including the Northampton County and Lehigh County Homeless Assistance Programs (HAP) to address emergency shelter and transitional housing needs. The City participates in the Northeast Pennsylvania Continuum of Care and is represented by its Housing and Community Development Planner.

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

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

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

The City of Bethlehem participates in and supports regional efforts to contact and serve the homeless and at-risk populations. While no CDBG funds in 2019 are targeted for homeless assistance, city staff continues to participate in efforts that address and assess homeless populations throughout the Lehigh Valley.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

On an ongoing basis, the City's Community Development Program and Health Department lead a city homeless advisory group that meets quarterly to discuss needs and efforts. The group works very closely with the Bethlehem Emergency Sheltering Group, a small non-profit that has winter shelters set up in churches throughout the city.

Additionally, through the Northeast Pennsylvania Continuum of Care and County Homeless Assistance Programs, comprehensive and varied programs are available in Bethlehem and the region to assist the

homeless make the transition to permanent housing and to address the special needs of persons who are not homeless.

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

The larger population of homeless in the City of Bethlehem does not meet HUD's definition of chronically homeless. Instead they are individuals or families who increasingly cannot find affordable housing or are evicted from their homes.

Some forms of assistance relate to the individual or family's housing situation and referrals can be made to the Pennsylvania Coalition Against Domestic Violence (PCADV), the National Alliance to End Homelessness, the National Coalition for the Homeless or specific programs of the US Department of Housing and Urban Development (HUD).

Additionally, Turning Point of the Lehigh Valley provides assistance in finding permanent, safe housing for victims of domestic violence and Valley Youth House assists with permanent housing solutions for homeless children.

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

Several 2019 activities are aimed at preventing homelessness.

The City's owner-occupied housing rehab program helps keep homeowners in their homes and out of the homeless or social support system.

The Representative Payee Program operated by New Bethany Ministries combats homelessness by providing financial management services - including paying rent on time - to individuals with mental health and other challenges.

The Salvation Army's rental assistance program was added this year as another means to prevent

homelessness among rent-burdened households.

Additionally, the Lehigh Valley Center for Independent Living's PLACE program helps locate housing for special needs residents.

## **Discussion**

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

### **Introduction:**

The City of Bethlehem, as a participant in the HUD Community Development Block Grant and HOME Investment Partnership Programs, annually re-examines the area of “barriers to affordable housing”. The City makes changes to public policy and programs as necessary to remove barriers as they become evident.

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

The City is aware of rising housing costs in the community and continues to fund its housing and economic development programs, assisting low income households to cope with these rising costs. The City of Bethlehem will continue to make certain its public policies are not discriminatory and consider policies in light of their impacts on housing affordability.

An examination of 2010 Census data documents that the number of minorities, Hispanics and African Americans, have increased throughout the City. The percentage of Hispanics has increased in seventeen (17) of the eighteen Census Tracts while African American percentages have increased in sixteen (16) of the eighteen (18) Tracts. Many of the Tracts with the smallest ratios of minorities in 2000 had the largest percentage increases in 2010. Clearly there are no discernable barriers to minorities in accessing housing throughout the City of Bethlehem.

Additionally, Bethlehem City staff is active on the steering committee for a program at the Lehigh Valley planning commission to draft model ordinances for municipalities that remove zoning/policy barriers to the creation of affordable housing.

### **Discussion:**

In some cases the barriers to affordable housing are directly linked to Fair Housing. For Program Year 2019, the City of Bethlehem’s plans regarding fair housing are based on the Lehigh Valley’s recent Regional Analysis of Impediments. Those plans consist of:

### **Actions to be taken re Disparities in Mortgage Lending:**

Bethlehem has 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 will continue to do so in the 2019 Program Year. While looking for ways to fund the recommended testing of lenders, North Penn Legal will continue its public Fair Housing education efforts, including a bus advertising campaign

and a Fair Housing Forum. Topics will include information on filing complaints on housing issues, including possible lending discrimination. The City of Bethlehem will continue 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.

**Actions to be taken re Need for Increased Fair Housing Education:**

The City of Bethlehem will continue 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 will 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, will:

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

**Actions to be taken re Need for Increased Coordination Among Fair Housing Providers**

The City of Bethlehem will reach out to the Bethlehem Human Relations Commission to better integrate that body into the regional fair housing dialogue and Fair Housing Project.

**Actions to be taken re Condition of Affordable Housing**

During 2019, Bethlehem will continue activities that rehabilitate owner-occupied units and support efforts to rehabilitate vacant units for sale to eligible households.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

Whether fostering partnerships among Bethlehem’s various agencies and organizations or looking to continue to develop the City’s own staff or keeping on top of the latest tools to combat poverty, the City’s Community Development Program will continue going beyond minimum requirements and basic expectations for one simple reason – so many of our City’s most vulnerable residents deserve no less.

### **Actions planned to address obstacles to meeting underserved needs**

The City has not identified any obstacles to meeting underserved needs except for lack of resources. Bethlehem plans to continue addressing that obstacle by continuing to pursue all appropriate funding opportunities for infrastructure, economic development, health care, education, public safety and all other aspects of our community's needs.

During 2019, the City will continue a community-driven planning effort known as North Side 2027 for neighborhoods on the City's North Side. The purpose is to develop strategies and focus resources on improving that part of the City.

### **Actions planned to foster and maintain affordable housing**

As detailed in AP-38 - Projects - and AP-55 - Affordable Housing, Bethlehem is taking a number of steps to foster and maintain affordable housing, including subsidizing the creation of new affordable units, the purchase of units and the preservation of existing units.

### **Actions planned to reduce lead-based paint hazards**

The City Health Bureau will continue to test young children and pregnant women for blood lead levels as part of the Childhood Lead Poisoning Prevention Program. If a child has an elevated blood lead level, an evaluation of the home is conducted. The blood-testing program is coupled with lead hazard education. Educational materials on the existence and dangers of lead in the home will continue to be widely distributed through the City's health clinic and the housing rehabilitation program. The literature includes information on lead abatement and removal. The City anticipates conducting an average of 200 elevated lead level tests each year.

Funding for lead abatement is available to income-eligible homeowners through the City of Bethlehem's Housing Rehabilitation program. The City has also received Healthy Homes funding, thus allowing CDBG/HOME funds to reach more properties. Any property owner in the City of Bethlehem can request a lead inspection of their property. The City assesses a fee for this service to cover the cost of the inspectors’ time. The City’s Health Bureau and the Housing Rehabilitation staff coordinate on issues

where elevated blood lead levels are identified.

### **Actions planned to reduce the number of poverty-level families**

Poverty, of course, is a function of income, which is related to education, job training and employment opportunities. Over a prolonged period, the City of Bethlehem faced significant economic dislocation as a result of the closing of Bethlehem Steel. The City will pursue the continued redevelopment of the site, where significant job-producing re-uses have already taken root. Other plans for the site include possible conversion of an office building into condos and construction of retail space and other new housing construction.

The City of Bethlehem has a comprehensive economic development program in support of the goals outlined by the Lehigh Valley Comprehensive Economic Development Strategy. Components of the economic development program include:

- Maintaining an inventory of available land and buildings
- Offering entrepreneurs and business owners technical assistance
- Offering Local Economic Revitalization Tax Assistance (LERTA), a tax abatement program
- Providing tax credits for certain specified Pennsylvania taxes, and
- Assisting with substantial land development projects, urban renewal, and improvements through the Lehigh Valley Regional Loan Pool.

Recaptured CDBG funds, previously lent out for business development, will continue to support a revolving business loan fund. No 2019 CDBG funds are allocated to this effort because the program has virtually reached self-sufficiency.

The activities described above create job opportunities that help alleviate poverty in the community. The City of Bethlehem will continue to invest in job-creating activities with an emphasis on the hiring of low income residents and to pursue economic development in all forms to increase the supply of higher-paying jobs available to City residents.

In the award of contracts, the City will continue to implement the Section 3 Plan, which promotes the utilization of firms owned by or employing low income persons.

An activity added for 2019 is training for local contractors to encourage their participation in the city's residential rehab program. This effort has the potential of improving economic conditions for local companies and their employees.

### **Actions planned to develop institutional structure**

Ongoing staff development, consultant input and community dialogue will continue to strengthen the

program's strong performance over the past several years.

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

- Program management and oversight
- Inter Department/Agency Coordination
- Sub-recipient contract administration and monitoring
- Program evaluation
- Report preparation and submission
- Public education and participation
- Special project development
- Consolidated Plan and Annual Action Plan preparation, monitoring, and evaluation
- Housing programs
- Economic development programs and initiatives

Beyond city staff, the Community Development Program will retain its strong relationships with other elements of the social safety net, including the governments of Lehigh and Northampton counties, the Bethlehem Housing Authority and a network of non-profit organizations.

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

As a common partner with so many of the public and private housing and social service providers, the Bethlehem Community Development Program has been a natural conduit for communication and interaction among these entities. The CD Program will continue to serve in that capacity while respecting the autonomy and uniqueness of each partner.

### **Discussion:**

# Program Specific Requirements

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

### Introduction:

The City of Bethlehem has identified all CDBG and HOME activities to be undertaken in FY 2019 in the Projects Section, PR-35 and PR-38, including administrative, project delivery, public services, public facilities and infrastructure and affordable housing, both rehabilitation and new construction.

### Community Development Block Grant Program (CDBG)

#### Reference 24 CFR 91.220(I)(1)

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

- |  |          |
|--|----------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed  | 0        |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 0        |
| 3. The amount of surplus funds from urban renewal settlements  | 0        |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan   | 0        |
| 5. The amount of income from float-funded activities   | 0        |
| <b>Total Program Income:</b>   | <b>0</b> |

### Other CDBG Requirements

- |   |         |
|---|---------|
| 1. The amount of urgent need activities   | 0       |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 100.00% |

### HOME Investment Partnership Program (HOME)

#### Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is

as follows:

The City of Bethlehem will not provide forms of assistance that are inconsistent with 24CFR 92.205 as detailed in 92.205(b) *Forms of assistance (1) and (2)*. All assistance provided by the City under its Owner Occupied Housing Rehabilitation Program, Homeownership Opportunity Program, Non-profit acquisition, rehab and resale activities and New Construction Rental Housing Development activities meets these requirements.

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

The City of Bethlehem will recapture that portion of HOME Program investment unforgiven by the elapsed affordability period or recapture the maximum net proceeds from the sale of the property. Net proceeds recovered will be used to: (1) Reimburse the HOME Program for the outstanding balance of HOME funds not repaid or forgiven during the applicable affordability period at the time of recapture. (2) Reimburse the HOME Program for “holding costs” or other costs associated with the recapture action. If net proceeds recaptured are less than the outstanding balance of HOME funds invested in the property, the loss will be absorbed by the Program and all HOME Program requirements would be considered to be satisfied. If net proceeds recaptured are greater than the outstanding balance of HOME funds invested in the property, the balance of net proceeds would be distributed to the owner.

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

Bethlehem uses HOME funds for one homebuyer activity, specifically: direct buyer subsidy for home purchases.

Bethlehem has chosen to use the **Recapture** option for this program. The HOME program’s investment, and thus the period of affordability, is ensured in all cases by a mortgage and note payable to the City of Bethlehem should the property be sold during the period of affordability.

Repayments are in the amount of the direct subsidy, subject to availability of net proceeds. Under the HOOP program, all HOME funds are considered the direct subsidy. In the construction/rehab sale properties, the direct subsidy is the amount of HOME funds used to reduce or help reduce the sales price from market value to an amount affordable to the buyer.

In the event that net proceeds – defined as sales price less other debt on the property – is insufficient to repay the entire direct subsidy, the recaptured amount shall be determined by the

following formula: HOME direct subsidy/Total project cost x net proceeds = Recapture amount.

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

Not applicable.

**Emergency Solutions Grant (ESG)  
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

The City of Bethlehem does not receive ESG funds.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Lehigh Valley Regional Homeless Advisory Board is the coordinating entity for all Continuum of Care and ESG funding for Bethlehem.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The City of Bethlehem does not receive ESG funds.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The City of Bethlehem does not receive ESG funds.

5. Describe performance standards for evaluating ESG.

The City of Bethlehem does not receive ESG funds.

