



The City of Springfield

COMMUNITY DEVELOPMENT BLOCK GRANT –
DISASTER RECOVERY
Partial Action Plan A

Mayor Domenic J. Sarno
November 5, 2013

Contents

SECTION 1: INTRODUCTION.....	3
Development of the Springfield CDBG-DR Action Plan.....	4
SECTION 2: IMPACT AND UNMET NEEDS ASSESSMENT	7
Impacted Neighborhoods	7
Unmet Needs Assessment	14
Housing.....	14
Economy	20
Infrastructure	23
Mitigation and Resiliency Measures	27
Summary of Unmet Need	27
SECTION 3: SPRINGFIELD’S GOALS, OBJECTIVES, AND RECOMMENDATIONS FOR LONG-TERM RECOVERY	29
The Rebuild Springfield Plan: Housing and Infrastructure.....	30
The Rebuild Springfield Plan: Economic Revitalization	33
Recovery Planning Informed by Post-Disaster Evaluation of Hazard Risk	33
Consistency with Local and Regional Planning Efforts	34
Provision of Disaster-Resistant Housing for All.....	34
Leverage.....	35
SECTION 4: DISTRIBUTION OF CDBG-DR FUNDS	36
Activity 1: Acquisition and Development for Homeownership	38
Activity 2: Removal of Blight.....	39
Activity 3: Housing Repair	39
Activity 4: Replacement of Multi-family Housing	40
Activity 5: Workforce Training.....	41
Activity 6: Business Recovery Loan Program	42
Activity 7: Urban Renewal	43
Activity 8: Roadways and Sidewalks	44
Activity 9: Parks.....	44
Activity 10: Schools	45

SECTION 5: PERFORMANCE SCHEDULE AND METRICS..... 46

SECTION 6: REBUILDING STANDARDS..... 48

 Replacement of Affordable Housing..... 48

 Promotion of High Quality, Durable, Energy Efficient, and Mold Resistant
Construction Methods 48

 Green Building..... 49

 Sustainable Communities 49

 Anti-Displacement and Relocation..... 50

SECTION 7: PROGRAM ADMINISTRATION 51

 Capacity 51

 Pre-Agreement Costs 51

 Prevention of Duplication of Benefits 51

 Steps To Avoid Occurrence of Fraud, Abuse and Mismanagement 51

 Program Income 52

 Monitoring Standards and Procedures..... 53

 Internal Audit 56

SECTION 8: CITIZEN ENGAGEMENT AND PARTICIPATION..... 57

 Citizen Participation and Availability of Plan 57

 Limited English Proficiency and Access for Persons with Disabilities 57

 Amendments to Action Plan 57

 Complaints 58

APPENDIX: PUBLIC COMMENTS 59

SECTION 1: INTRODUCTION

The City of Springfield was dramatically impacted by multiple Presidentially-Declared Disasters in 2011, the most severe of which was a June 1, 2011 F3 tornado. The tornado ripped through the downtown areas of Springfield and cut a mile swath through several neighborhoods, finally exiting the City limits through the East Forest Park and Sixteen Acres Neighborhoods. Current estimates of damage from this disaster exceed \$170 million.



In addition to the tornado, in 2011 the City endured two disastrous snow storms, the worst of which was a surprise October Nor'Easter that caused approximately \$30 million in damages and recovery costs. In addition, the City also received another Presidential Disaster Declaration for damages caused by Hurricane Irene.

When a major disaster is declared, the declaration states whether the disaster is eligible for Public Assistance (provided to a state or municipality) or Individual Assistance (provided to private citizens and small businesses). Although each of the 2011 disasters had an economic impact and left unmet needs in the City, only the tornado was awarded both Public Assistance and Individual Assistance; the other 2011 Springfield disasters were awarded only Public Assistance. The award of both types of assistance

for the June 2011 tornado reflects the larger scale of this disaster and the extensive damage that it caused.

In early 2013, Congress enacted the Disaster Relief Appropriations Act of 2013 (Public Law 113-2, approved January 29, 2013) (the Act). The Act appropriates monies targeted for disaster recovery to various federal agencies. Among those monies, the federal government appropriated \$16 billion in Community Development Block Grant Disaster Recovery (CDBG-DR) funds to be split among communities that experienced natural disasters in 2011 or 2012, or that experience natural disasters in 2013, and which the President declared or declares to be major disasters.

The City of Springfield was allocated \$21,896,000 of the CDBG-DR fund distribution to assist the City's recovery efforts. CDBG-DR funds appropriated in the Act are subject to guidance provided by HUD in the March 5, 2013 Federal Register (FR-5696-N-01). As a precondition to receiving CDBG-DR funds, the City of Springfield must submit and receive HUD approval for this comprehensive Action Plan that details its unmet needs and describes the proposed uses of CDBG-DR funds to address those needs.

The Disaster Relief Appropriations Act requires the City to spend all CDBG-DR funds within two years of the date HUD obligates the funds to the City, unless HUD provides an extension. The start date of the obligation is the date that HUD signs the CDBG-DR grant agreement, which will take place after HUD's approval of this Action Plan. Grantees may submit a partial Action Plan, in order to obligate a portion of their CDBG-DR allocation, and subsequently submit one or more Substantial Amendments to the Action Plan to obligate more of the allocation. Because of the strict deadlines imposed, the City of Springfield is submitting this Action Plan as a Partial Action Plan and will submit one or more later Substantial Amendments to this Action Plan. HUD must obligate all funds by September 30, 2017, so the City's final Substantial Amendment to the Action Plan will be submitted no later than June 1, 2017.

This partial Action Plan A commits \$13,906,000 of the City's CDBG-DR allocation.

Development of the Springfield CDBG-DR Action Plan

The City of Springfield Office of Community Development has developed this Action Plan, and will be responsible for administration of the CDBG-DR funds.

The Action Plan was developed after having received considerable input from other City departments and agencies, affected neighborhoods and stakeholder groups and with support from state and federal government partners. The City held three public hearings to gather input on the plan at the following locations:

- July 10, 2013, JC Williams Center, 116 Florence St., Topic: “Infrastructure”
- July 11, 2013, Italian Cultural Center, 36 Margaret St., Topic: “Economic Revitalization”
- July 17, 2013, JC Williams Center, 116 Florence St., Topic: “Housing”

These meetings were held at sites located in low-income neighborhoods impacted by the June 2011 tornado. Spanish translation was available at the meetings. In total, 63 individuals attended the meetings. Notice of meetings was posted on the City’s website and published in the *Springfield Republican* (Neighborhood Plus and the Classified-Legal section) and *La Voz*, a local Hispanic publication. Announcements were made on WAMC and WSPR to appeal to Spanish-speaking residents. Flyers advertising the meetings were distributed to community groups, neighborhood councils, City Council members, and a large database of stakeholders and residents who have expressed interest in community development activities within the City. The meeting notices also encouraged city residents to comment in writing, and the City received extensive written comment. A summary of the comments received is located in the Appendix to this document.

As required by HUD, the City consulted with the Springfield Housing Authority and with owners of all HUD-subsidized housing impacted by the tornado to learn about their unmet recovery needs. Development of this CDBG-DR Action Plan has been coordinated and informed by the regional Sustainable Communities planning initiative led by the Pioneer Valley Planning Commission. The City has worked with the Massachusetts Department of Housing and Community Development in coordinating the City’s efforts with the state’s recovery initiatives.

The priorities of the Action Plan are also based upon the broad public planning process that took place in 2011 and 2012, which involved multiple public meetings and stakeholder conversations and included participation by over 3000 City residents. This tornado rebuilding master planning process resulted in the ReBuild Springfield Plan, which can be accessed at www.developspringfield.com.

A draft Action Plan was released at a press announcement on August 21, 2013, and was published on August 22, 2013 in English and Spanish on the City’s website www.springfield-ma.gov/planning/cdbg-dr. This website is featured prominently on, and is easily navigable from, the City’s homepage (www.springfieldcityhall.com).



The draft Action Plan was also made available in paper copy in English and Spanish at the following locations: Office of Community Development, 1600 East Columbus Ave.; Office of Housing, 1600 East Columbus Ave.; Office of Planning and Economic Development, 70 Tapley St.; Office of Neighborhood Services, 70 Tapley St.; Office of Health & Human Services, 95 State St.; Mayor’s Office, 36 Court St.; and City of Springfield Central Library, 220 State St.

The formal public comment period on the draft Action Plan opened at 5pm (EST) on August 22, 2013 and extended for a 7 day period until August 29, 2013 at 5:00pm (EST). During the comment period, public comments could be submitted as follows:

- Electronically on the City’s CDBG-DR website at www.springfield-ma.gov/planning/cdbg-dr
- Written comments mailed to:
Office of Community Development
1600 East Columbus Avenue
Springfield, MA 01103
- Via telephone by contacting 311, the City of Springfield’s main source of government information and non-emergency services.

At the end of the comment period, all comments were reviewed, and a summary of the comments and City response are included in the Appendix to this document. The Final Action Plan, incorporating changes made following the public comment period, is posted in English and Spanish on the City’s CDBG-DR website. Paper copies will be made available upon request.

SECTION 2: IMPACT AND UNMET NEEDS ASSESSMENT

HUD requires the City to explain and quantify the impact of the disaster, and complete an unmet needs assessment that quantifies the funding needed for recovery. This section describes the impact on different parts of the City, and then analyzes recovery needs.

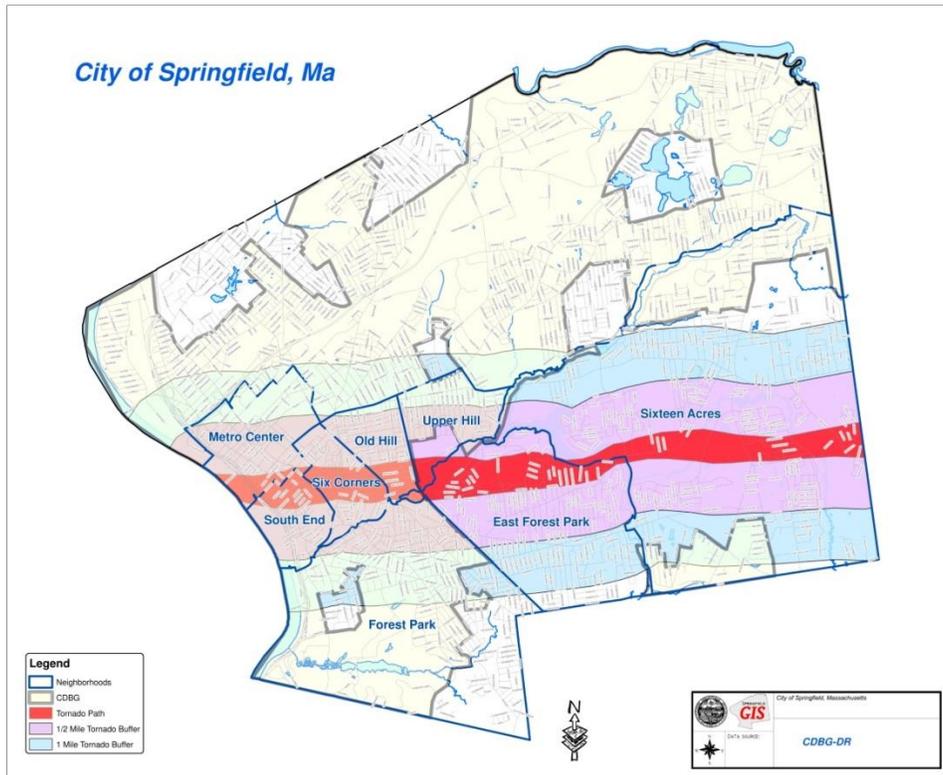
Impacted Neighborhoods

Per HUD guidance, Springfield has undertaken an analysis that summarizes damage to the tornado-impacted neighborhoods and provides a description of demographic information about these neighborhoods. The data was generated using the 2011 American Community Survey 5-Year Survey data, FEMA Initial Damage Assessment data, and City of Springfield data regarding damaged properties. Due to privacy issues, the City was unable to obtain individual FEMA claims and SBA loan data for claims paid. Therefore, this analysis relies heavily on City of Springfield data regarding damaged properties, supplemented by summary reports provided by FEMA and SBA.

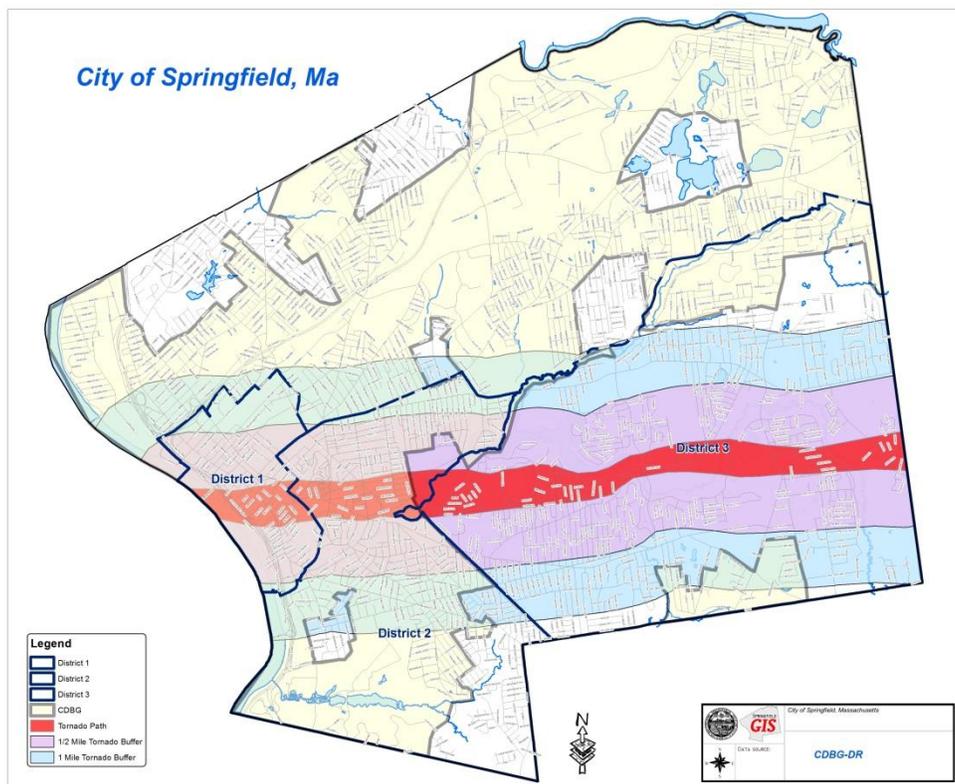
While the tornado's path encompassed portions of eight neighborhoods, the vast majority of residential damage took place in just five: South End, Six Corners, Old Hill, East Forest Park, and Sixteen Acres. Following the tornado, the City, with leadership from the Springfield Redevelopment Authority and DevelopSpringfield, undertook a master planning process using a master planning consultant and involving over 3000 city residents. The resulting plan, Rebuild Springfield (which is discussed in more detail below), grouped the tornado-impacted neighborhoods into three districts, each of which has different characteristics and needs. This narrative summary uses the district framework to organize information about the impact on and demographic data of each of the neighborhoods.

The maps on the following page illustrate the neighborhoods and district boundaries in relation to the tornado path. After the neighborhood and district maps is a narrative that describes each of the districts and the tornado damage in each district. This section ends with a chart detailing the demographics and amount of damage in each impacted census tract follows the descriptive narrative, and a map showing the location of the impacted census tracts.

Map Identifying Neighborhood Boundaries



Map Identifying District Boundaries



District 1: Metro Center and South End

The Metro Center and South End neighborhoods include a combination of commercial and residential uses, and over 90% of housing units are renter-occupied. In the South End and Metro Center, 30 structures with 242 housing units were condemned following the tornado. Ninety-nine housing units were destroyed. The building housing the South End Community Center and the Zanetti School building were badly damaged. A major mixed-use property at 979 Main Street



was destroyed and a number of retail buildings along Main Street also suffered extensive damage. Severely damaged commercial property included the administrative offices and a child care site for Square One, an early childhood learning center.

Metro Center and the South End are very low-income neighborhoods, with median household incomes under \$20,000 per year and poverty rates at 40-45%. Residents of these neighborhoods are predominantly Latino (about two-thirds), and about 20% African American. In the South End, 2% of households are made up of individuals 65 or older living alone, and in Metro Center, 16% of households are made up of individuals 65 or older living alone.



The South End neighborhood has a history of distress, but has been subject to a multi-year revitalization effort since 2007, which has included major road and streetscaping work, an urban renewal plan which allowed for expansion and revitalization of a 7-acre park, clearance of a Brownfields site, and the initiation of redevelopment of almost 300 units of HUD-subsidized multi-family housing.

The South End has been designated as Neighborhood Stabilization Program (NSP) area since 2009, and has been a Neighborhood Revitalization Strategy Area (NRSA) since 2008. These designations indicate that this neighborhood is the focus of the City's sustained and targeted spending intended to bring about revitalization.

District 2: Six Corners, Old Hill, Upper Hill and Forest Park

The majority of tornado damage in District 2 took place in the Six Corners and Old Hill neighborhoods. The primary location of damage in the Upper Hill neighborhood was located on the campus of Springfield College, where a dormitory was severely damaged and mature trees were toppled. A small number of homes and businesses on the edge of Forest Park were also damaged.



This district contains urban core neighborhoods which are predominantly residential with neighborhood-serving retail and some commercial uses. Within the district, 79 residential structures with 227 housing units were condemned following the tornado. One hundred nineteen units were destroyed. Among the units that were destroyed or sustained significant damage in this district are 50 subsidized housing units and 12 public housing units. Elias Brookings Elementary School was damaged beyond repair. Ruth Elizabeth and Harriet Tubman Parks sustained damage as well. The private Commonwealth Academy sustained enormous damage to several historically significant buildings, extensive tree loss, and the campus landscape as a whole.

Six Corners and Old Hill are low-income neighborhoods with median household incomes of under \$25,000 per year. These neighborhoods are made up predominantly of African-American and Latino residents, although Old Hill has a higher percentage of African-Americans (44%) and Six Corners has a higher percentage of Latinos (57%). The combined neighborhoods are 18% non-Hispanic white.

The District 2 neighborhoods faced many challenges even before the tornado struck, including abandoned properties, substandard housing, low homeownership rates, higher than average crime and poverty rates, and low educational attainment. The Old Hill and Six Corners neighborhoods have been designated as Neighborhood Stabilization Program (NSP) areas since 2009, and have been Neighborhood Revitalization Strategy Areas (NRSAs) since 2008.

District 3: East Forest Park and Sixteen Acres

In the East Forest Park and Sixteen Acres neighborhoods, 146 single-family homes were condemned following the tornado. Fifty-six were destroyed. East Forest Park also experienced extensive damage to the Mary Dryden Elementary School and Cathedral High School, a local parochial school. The neighborhood, which includes areas of natural resources, lost extensive amounts of trees and sustained damages to parks and open space.



The area's high rate of homeownership, combined with existing home insurance coverage, has enabled these neighborhoods to rebuild quickly. Of the 277 homes that FEMA categorized as having sustained major damage, all but a few have been rebuilt or repaired.



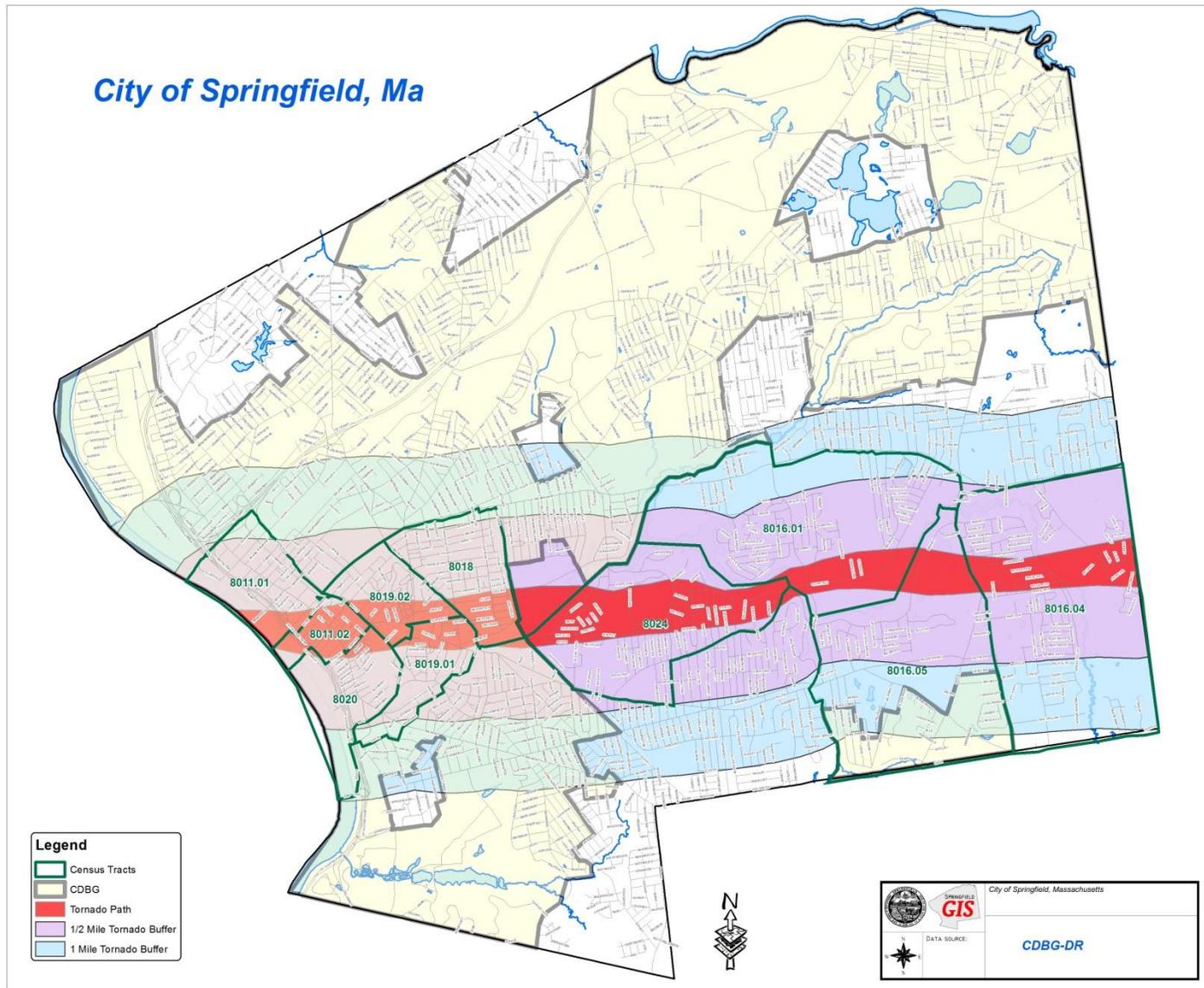
East Forest Park and Sixteen Acres are the two highest-income neighborhoods in Springfield. The median family income in East Forest Park is \$77,222; in the three Sixteen Acres census tracts impacted, median household incomes are \$50,966, \$76,354, and \$46,900. The neighborhoods include a mix of races and ethnicities: the East Forest Park census tract is 9% Black, 8% Latino, and 79% white; and the Sixteen Acres census tracts are 17% Black, 15% Latino, and 63% white. The neighborhoods have higher-than average numbers of residents over 65 living alone—ranging from 11 to 16%.

Demographic Data by Census Tract and District

	DISTRICT 1	DISTRICT 2			DISTRICT 3			City of Springfield	
	South End	Old Hill	Six Corners		Sixteen Acres		East Forest Park		
Census Tract	8020	8018	8019.01	8019.02	8016.01	8016.04	8016.05	8024	-
Households	1165	1257	1499	1508	1493	1481	1722	1517	56,211
% Black Households	14%	44%	28%	14%	17%	9.1%	20.8%	9%	20%
% Asian/Pacific Islander Households	1%	0%	0%	0%	2%	2.5%	1%	2%	2%
% Native American Households	0%	0%	0%	0%	0%	0%	0%	0%	0%
% White Households	23%	13%	20%	19%	62%	75.6%	53.6%	79%	38%
% Hispanic Households	63%	40%	51%	63%	14%	12.2%	21.8%	8%	37%
% Disabled Households	<i>U.S. Census data does not provide this information by census tract for Springfield.</i>								21%
% Households over 65 living alone	2%	12%	3%	11%	14%	14.9%	15.6%	14%	11%
% Owner-Occupied Households	9%	45%	15%	15%	82%	97.8%	61.1%	94%	51%
% Renter Occupied Households	91%	55%	85%	85%	18%	2.2%	38.9%	6%	49%
Median Household Income	\$17,236	\$24,602	\$18,861	\$17,874	\$50,966	\$76,354	\$46,900	\$77,222	\$35,603
% 1-4 Family	59%	83%	58%	31%	86%	100%	81.2%	100%	76%
% Multifamily	41%	17%	42%	69%	14%	0%	18.8%	0%	24%

Source: US Census, 2011 ACS 5-year

Map Showing Impacted Census Tracts



Unmet Needs Assessment

The unmet needs assessment is used to determine the extent of unmet needs and to help prioritize among those needs. The assessment must evaluate three core recovery sectors: (1) housing; (2) the economy; and (3) infrastructure. According to HUD, “unmet needs” are financial resources necessary to recover from a disaster that are not satisfied by disaster funding sources like FEMA Individual Assistance, SBA Disaster Loans, or private insurance. The City’s analysis includes these sources mentioned, plus already-donated labor and materials that can be quantified. The City acknowledges that there will be other sources that will become available in the future, but is unable to quantify the other sources at this time because they will be funds that are applied for as projects are developed, and the sources and amounts are not yet known. Additional information about other expected sources of funding is included in Section 4, listed as expected leverage for each activity to be funded.

Housing

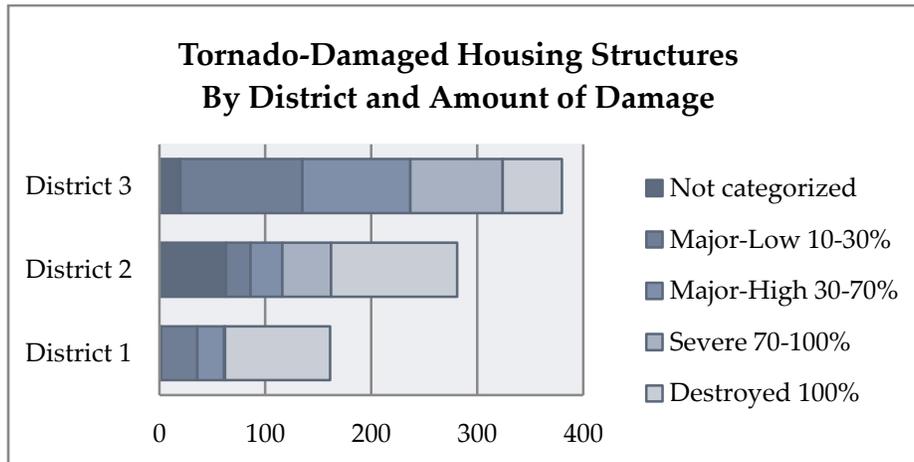
The June 2011 tornado significantly impacted Springfield’s housing stock. The following tables identify the different types of condemned housing by district, and the interim and permanent housing needs resulting from the tornado damage.

Table 1: Summary of condemned housing

		District 1	District 2	District 3	TOTAL
Total residential structures		30	79	146	255
Total residential units		242	227	146	615
By unit count	Single-family	0	34	146	180
	Multi-family	242	193	0	435
By tenure (units)	Owner-occupied	6	36	136	178
	Renter-Occupied	236	191	10	437
By affordability (units)	Market	229	166	146	541
	Affordable	13	61	0	74
By types of affordable units	Public housing	0	14	0	14
	HUD-Subsidized	13	47	0	60
Homeless and special needs housing (units)	Emergency shelter	0	0	0	0
	Transitional Housing	0	0	0	0
	Permanent supportive housing	13	0	0	13

Source: City of Springfield, compiled from records from Code Enforcement, Office of Housing, and Law Department

While the above chart details housing that was *condemned* following the tornado, the chart below shows *all* damaged buildings, whether condemned or not. The City does not have the same level of detail available for all damaged housing units, so this data cannot be broken out into all the categories used to describe the condemned units. The information in the following chart is based primarily on FEMA initial assessment data, and refers to *structures*, not units.



Source: City of Springfield data; FEMA Initial Assessment Data

Table 2: Interim and Permanent Housing Needs

	District 1	District 2	District 3
Interim	None	None	None
Permanent	<ul style="list-style-type: none"> Housing repair New homeownership units 	<ul style="list-style-type: none"> Housing repair New homeownership units Replacement of affordable units 	<ul style="list-style-type: none"> Housing repair New homeownership units

Source: City of Springfield, compiled from information from Office of Housing, Department of Planning, and the Springfield Long-Term Recovery Group

Impact on Homeowners

According to FEMA preliminary assessments conducted in June 2011, the tornado impacted 475 owner-occupied homes. Of this number, 306 homes sustained severe or major damage; the majority of these units are located in the District 3 neighborhoods. Springfield Code Enforcement and Law Department data shows that, two years after the tornado, most owner-occupied homes have been repaired or rebuilt. Rebuilding has been funded through a combination of homeowners’ insurance, Small Business Association (SBA) disaster loans, bank loans, homeowner savings, and donated resources, including volunteer labor.

Springfield's Long-Term Recovery Group, an organization developed to canvas unmet needs and employ a social worker to assist individuals in finding resources (including donated resources) to meet those needs, reported in June 2013 that they were not aware of any homeowners still in need of assistance with reconstruction or rehabilitation, but acknowledged that, despite extensive outreach to find impacted homeowners, there could be homeowners who have not applied or who were not ready to apply due to ongoing negotiation or litigation with insurance carriers. The public process undertaken as part of the CDBG- DR Action Plan identified a very small number of homeowners still in need, and the City will work with these residents to assist them in accessing CDBG-DR and other assistance to enable them to rebuild.

HUD allows CDBG-DR funds to be used in limited circumstances to reimburse homeowners for documented "necessary" and reasonable eligible disaster-related unreimbursed recovery costs incurred within one year of the date of the disaster. To reimburse these funds, a number of HUD requirements would need to be met prior to when the funds were spent. For this reason, and because the City is directing its CDBG-DR allocation to lingering unmet needs resulting from the 2011 disasters, the City has determined that it will not provide CDBG- DR assistance to homeowners for expenses incurred prior to the City's CDBG-DR award.

Impact on Rental Stock

According to FEMA preliminary assessment data, almost half of all housing damage occurred to rental stock, approximately 430 units. The City's Code Enforcement Department condemned with 357 rental units in the immediate aftermath of the tornado. According to the 2010 US Census, the City had a 7.4% rental vacancy rate prior to the tornado, with 2,285 units available for rent. The City's Office of Housing led a multi-agency rehousing effort, and the City's experience was that renters who were displaced and had sufficient income to rent replacement housing were able to find new rental units quickly.

City condemnation and demolition records indicate that the City has permanently lost a total of 110 rental units; these are units which were destroyed in the tornado and for which there is no indication of intent to rebuild. Many of these units were one-, two- and three-family homes which are not being rebuilt and which are now vacant or abandoned lots. This is particularly the case in District 2, where many investment property owners abandoned their properties and there are now numerous empty lots, many of which are now in tax-title. Long-term, the loss of this number of units has not had a significant impact on the overall availability of rental housing in Springfield.

Impact on Low and Moderate Income Populations

The City surveyed all impacted property and contacted property owners in order to identify all public and HUD-subsidized units that were impacted. The City’s Office of Housing reports that the tornado destroyed a total of 74 units of public and subsidized low-income housing; these are identified in Table 3. Rehousing data collected by HAPHousing and the City

Table 3: Destroyed Public and Subsidized Housing

Owner	Property	Number of units
Mental Health Association	Union Street Supportive Housing	13
Valley Real Estate	Spring Hill Apartments	21
Hill Homes Cooperative	Hill Homes	26
Springfield Housing Authority	3 duplexes on Eastern/Melrose	6
	425 Central Street	8

Source: City of Springfield Office of Housing

indicate that displaced tenants have been rehoused in other affordable units. However, there is an intention to replace the destroyed affordable units. Due to the complicated financing and planning necessary to construct public and subsidized housing, these projects are still in the planning stages, with the exception of the 13 Mental Health Association units, which are scheduled to begin construction in fall 2013.

Other public and subsidized housing was damaged, including SHA units on Renee Circle, Home City Housing units at 71 Adams Street, and First Resource Management units at 75 Saratoga Street. These units have been repaired, with the exception of 71 Adams Street, where repairs and upgrades are currently underway after the owner obtained tax credit equity and state and federal affordable housing funds.

Tenants with Section 8 Housing Choice Vouchers were displaced when their privately-owned units were damaged or destroyed. The City does not have data that indicates the number of Section 8 voucher holders impacted. The experience of rehousing specialists was that these households were able to relocate quickly because of their mobile assistance and the existence of available comparable units in the private market.

Impact on Special Needs Populations

Households with special needs are oftentimes more vulnerable to natural disasters due to damaged or displaced support networks, accessibility issues or increased costs of living. The City has reviewed information regarding the impact of the June 2011 tornado on the following populations: adults, children, and youth who are homeless or at risk of homelessness, who have intellectual or developmental disabilities, who have physical disabilities or who have behavioral health needs. Certain populations of older adults also may face special challenges after a natural disaster.

Homeless Households

The destruction of housing made hundreds of households homeless in the immediate aftermath of the tornado, especially renter households who were less likely to have insurance that might cover interim housing. The Red Cross opened an emergency shelter which served up to 300 households. Due to several factors, displaced households were able to quickly rehouse. Most renter households received FEMA Individual Assistance. The City had a 7% rental vacancy rate at the time so units were available to rent. Social Services organizations collaborated to provide housing search assistance and financial support to households in need. The owners of public and subsidized units, including the Springfield Housing Authority, the Mental Health Association, and the owners of Spring Hill Apartment (Valley Real Estate) prioritized displaced tenants for available units and rehoused tenants quickly. Residents of Hill Homes Cooperative Apartments and people who had been doubled up with other households were able given priority for public and subsidized units throughout the city and region, and the state Department of Housing and Community Development (DHCD) provided housing subsidy for those unable to locate or be accepted into existing housing units.

There has been no long-term impact on the number of homeless individuals or families in the City. No facilities that serve people who were homeless were damaged in the tornado.

Older Adults

Because the City has been unable to access FEMA Individual Assistance claims due to privacy concerns, it does not know the number of older adult households that have claims. However, based on census data, the City estimates that 10-15% of households that incurred damage were made up of older adults living alone. The City recognizes that certain older adult households may face special challenges after a natural disaster. These households may be on a fixed income and have fewer resources available to assist in their recovery. They may have had greater difficulty in undertaking cleanup tasks.

Adults with Mobility Impairments

Homeowners with mobility impairments may have faced additional costs associated with the need for ramping or other accessibility measures. Renters with mobility impairments faced the additional challenge of needing to locate an accessible unit.

Households with Individuals Having Developmental or Intellectual Disabilities or Behavioral Health Needs

One 13-unit apartment building which provided supportive housing to individuals with behavioral health needs was destroyed. This HUD-funded section 811 building, called Union Street Supportive Housing and operated by the Mental Health Association, is also referenced in the discussion of low-income housing. Construction of replacement units is beginning this fall.

Analysis of Unmet Housing Needs

To estimate the unmet housing need in Springfield, the City uses available data to quantify the cost to repair damage to the housing sector caused by the tornado. The City then adds together amounts received from other funding sources like FEMA Individual Assistance, SBA disaster loans, private insurance, and documented completed donated repair/rehabilitation work to quantify funding that has been provided for repairs to the housing sector. Subtracting the latter figure from the former arrives at Springfield’s estimate of its unmet housing need.

As documented in Table 4, summary FEMA Individual Assistance data as of July 18, 2013 reports a Full Verified Loss (FVL) of \$516,100 for homeowner real property damage, which is derived from cursory FEMA inspection reports. Previous disasters have shown that an FVL figure substantially underestimates the actual cost of rehabilitation and reconstruction. In addition, the FEMA data reflects only 4 applications for assistance from homeowners with losses of over \$28,800, but there were 71 owner-occupied homes which incurred a 100% loss.

This indicates that very few homeowners with large losses submitted FEMA applications. As a result, the City is using the FEMA data to provide information about the amount of FEMA assistance provided to homeowners, but not for the purpose of quantifying the total amount of homeowner loss.

Table 4: FEMA Housing Repair/Replacement Payments Made

Real Property Full Verified Loss Amount	Total Apps	Total Real Property Full Verified Loss	Total Repair/Replacement
FVL<\$3,000	222	\$81,873	\$48,025
FVL \$3,000 - \$8,000	55	\$115,623	\$86,121
FVL \$8,000 - \$15,000	20	\$60,282	\$39,966
FVL \$15,000 - \$28,800	2	\$20,587	\$30,200
FVL > \$28,800	4	\$237,733	\$57,226
TOTAL	303	\$516,098	\$261,538

Source: FEMA, July 18, 2013

The City has undertaken a calculation based on the actual number of residential units damaged, and estimated cost of repair for each level of damage. Based on this analysis, the City estimates the total amount of real property damage for owner-occupants to be \$70,755,000.

Data provided by the Massachusetts Division of Insurance indicates that the average home damage claim was \$25,784. If each of the City’s damaged 862 units were paid claims of \$25,784, the total of insurance claims paid in Springfield was \$22,225,808.

As shown in Table 5, SBA data as of July 15, 2013, indicates that 131 households had received SBA loans totaling \$4,920,900. According to these numbers, SBA loans averaged approximately \$37,564 per household.

Table 5: SBA Summary Data

Springfield	Home Loan Applications
Applications Issued	1382
Applications Received	315
Approved Loans	131
Approval Dollars	\$4,920,900

Source: SBA, July 15, 2013

The City estimates the total amount of housing damage is \$70,755,000. The total amount of insurance claims plus SBA loans paid out is estimated to be \$27,146,708. The remaining total unmet housing need is **\$43,608,292**, and this number is shown in the summary table on page 28.

Economy

The June 2011 tornado had widespread effects on the Springfield business community, both short-term and long-term. In the immediate aftermath of the storm, the most significant issues were damage to buildings; power loss; access with many closed roads and closed transit services; delivery challenges; and access to work for staff. Businesses lost revenue as they were unable to open while roads were cleared, power restored, and repairs were made. The timeframe of these challenges ranged from hours to weeks for some businesses.

Beyond immediate storm related concerns, other businesses had more significant long term effects, including major property damage, loss of equipment, intellectual property, and in a handful of cases loss of entire buildings. While most businesses reestablished at their former location, others were forced to reestablish in other locations, and a small percentage were unable or chose not to reestablish. The small number which were unable to reopen resulted in some long-term job loss.

Many businesses dealt with perception problems of a customer base that immediately after the storm weren't sure of the status of certain businesses or thought that the location was no longer a safe and welcoming place to do business after the disaster. As the disaster struck both the Metro Center and South End, loss of visits during this time and associated tourism spending during these days also impacted the business community. The city's most significant tourism attractions – the Naismith Memorial Basketball Hall of Fame and the Springfield Museums Quadrangle & Dr. Seuss sculpture garden were both located in affected neighborhoods that dealt with real infrastructure closures as well as perception issues post-disaster that discouraged tourism spending.

Two years later, the business community continues to rebuild; however, challenges remain due to properties that have not rebuilt or repaired due to insurance, absentee landlord issues, and market demand.

Businesses

The City, through a door-to-door canvassing of businesses in the weeks following the tornado, identified 68 businesses that sustained damage, which are identified in Table 6. Without doubt there were more that were affected that the City was unable to identify. As shown in table 7, 387 Springfield businesses requested applications for disaster-related Small Business Association (SBA) loans, and 61 businesses submitted SBA loan applications. The Massachusetts Division of Insurance report on tornado claims indicated an approximate 217

commercial property claims in Springfield. It should be noted that both the SBA and insurance numbers include residential rental property loss, which the City includes in the section on housing; this accounts for the discrepancy between the City’s count and the number of SBA applications requested and commercial insurance claims.

Because this event made a path through the entire length of the city, it touched upon many types of business districts and business types, from retail to industrial. This wide variety of businesses represents the different neighborhoods that were affected. In the South End many of the businesses were retail in nature with some upper floor office, education, and nonprofit uses. As the storm moved towards the Six Corners, East Forest Park, and Sixteen Acres neighborhoods it affected a number of retail, office, auto, and some light industrial/warehouse uses.

Table 6: Businesses Impacted

Sector	Number of Businesses	NAICS Code
Manufacturing	3	332710
Wholesale Trade	3	425110
Retail Trade	12	453998
Transportation and Warehousing	1	531120
Finance and Insurance	6	522291
Real Estate and Rental and Leasing	1	531210
Professional, Scientific, and Technical Services	8	541380
Educational Services	1	611110
Human Resources Programs	5	923130
Arts, Entertainment, and Recreation	4	711110
Restaurants	5	722513
Office of Law	3	541110
Automotive Services	10	811198
Church	1	813110
Physical Therapy	1	621340
Beauty Salon	3	812112
Plumbing & Heating	1	238210
Electrical	1	238220

Source: Springfield Dept. of Economic Development

Economic Impact

The tornado’s extensive damage to utility infrastructure, combined with extensive tree damage which left major roads blocked, resulted in businesses in the tornado zone that were unable to open for business for weeks after the tornado hit. For some businesses, the period of business interruption was much longer, because of a need to relocate due to destroyed or extensively damaged business locations. This includes cancelled tourism visits, business losses due to shuttered offices, and wages not paid to workers who could not access their workplace.

Assistance Provided to Businesses

Based on SBA data, the City estimates that a minimum of 50% of the statewide commercial damage occurred in the Springfield. For all SBA applications issued to businesses, 52% were issued to Springfield businesses, and 48% of applications received were from Springfield businesses. While only 37% of the total number of SBA business loans were in Springfield, the lower loan rate in the City is likely due to lower levels of creditworthiness in the City than in surrounding communities. The City’s higher level of dollars funded (58%) is a likely result of larger businesses being located in the City.

Table 7: Small Business Association Loans (Business Loans)

	MA Total	Springfield	
	Number	Number	Percent
Applications Issued	741	387	52%
Applications Received	127	61	48%
Approved Loans	27	10	37%
Approval dollars	\$4,726,800	\$2,755,500	58%

Source: SBA Disaster Loan Assistance Statistics, 7/16/2013

As shown in Table 7, overall, Springfield businesses requested 387 SBA Loan Applications, submitted 61 SBA Loan Applications, and had 10 loans approved for a total of \$2,755,500 in assistance. This is an average of \$275,550 per approved application.

Of these amounts, the average for real property loss was \$259,177, the average for other property loss was \$48,700, and the average for economic impact was \$22,500 (based on SBA report on Approved Loans by County and Zip, 5/29/2013).

As shown in Table 8, the Massachusetts Division of Insurance reports that a total of 757 commercial property claims were filed statewide in connection with the June 2011 tornado. Springfield has applied the overall 50% figure derived from the breakdown of SBA loans to estimate the number of insurance claims likely to have been paid regarding Springfield businesses.

Commercial insurance claims include businesses, nonprofit agencies, and residential rental properties (coverage for landlords). This analysis attempts to exclude residential rental properties, because these are included in the needs assessment concerning Housing.

Table 8: Commercial Property Insurance Claims

Damaged Property	Number of MA Claims	Number of Springfield Claims (estimated)	Average Claim Payment	Total Springfield Claim Payments
Commercial Vehicles	299	150	\$4,240	\$636,000
Commercial Buildings	433	217	\$73,049	\$15,851,633
Other Commercial Property	25	13	\$105,490	\$1,371,370
TOTAL	757	380		\$17,859,003

Source: MA Division of Insurance, The June 1, 2011 Mass Tornadoes, May 22, 2012

Analysis of Unmet Business Need

To estimate the extent of the unmet need in Springfield’s economic sector, this assessment estimates the total cost to repair commercial property damages and total amount of losses from interrupted business in the aftermath of the storm, and subtracts funding provided to date by private insurance and the SBA.

Commercial property damage is any storm-related damage to commercial buildings, loss of inventory, and damage to fixtures, machinery and equipment. To estimate commercial property damage, the unmet needs assessment considers its own information gathered from its survey of business owners and information on insurance claims reported by the Massachusetts Division

of Insurance in addition to information on SBA loans. The larger number of businesses and claims identified through these other sources indicate that the SBA application and approval rates are not true reflections of the existence of unmet need.

Business owners indicated to the City that reasons for failure to apply for SBA loans was due to a number of factors, including: already-existing levels of debt that did not allow for incurring additional debt; businesses perceiving that SBA interest rates as high; SBA loans require a large amount of documentation, often not readily available for processing; and some businesses are reluctant to accept SBA loan terms, for example requirements that business owners post personal residential property as collateral to qualify for loans.

The City was able to review summary data sets but not specific individual SBA applications of businesses impacted due to privacy policies. In order to calculate the total business property loss in Springfield, the City has estimated that 80 business and non-profit entities sustained losses as a result of the tornado. Of these entities, the City estimates that 10 are very large and sustained damages of over \$1 million, while the rest are small businesses.

The City has used the average SBA loan amount, \$275,550, to represent the expected amount of business property losses incurred that were not covered by insurance, and has estimated that 80 businesses incurred substantial damage. Based on this calculation, Springfield businesses incurred property damages beyond what insurance covered of \$22,044,000. This amount added to the total insurance payments for tornado property damage (\$16,487,633) yields a total cost of business damage of \$38,531,633.

Similarly, to estimate damage caused by business interruptions, the unmet needs assessment conservatively assumes that each of the 100 impacted businesses incurred an average of \$22,500 (the average SBA payment for economic impact), for a total of \$2,250,000.

Based on this analysis, Springfield businesses sustained an estimated \$40,781,633 in total commercial loss and interrupted business operations. In total, \$20,614,503 of recovery funds has been disbursed, including SBA loans of \$2,755,500 and commercial insurance of \$17,859,003. This leaves **\$20,167,130** in current unmet need, which is shown in the summary chart on page 28.

Infrastructure

The 2011 tornado and other 2011 disasters extensively impacted Springfield's infrastructure. Falling trees and debris made many roads impassable, and roadways and sidewalks experienced damage from the falling trees. The delivery of core utility services was substantially impaired, and thousands of residents lost power as powerful wind and falling

trees downed power lines. In addition to the transportation damage and utilities interruptions, the City sustained extensive damage to other public infrastructure, including schools, a community center, and parks. The storm created multiple public health issues, including unsafe structures, environmental hazards (e.g., mold, lead and asbestos) and extensive amounts of building and vegetative debris.

Springfield's unmet needs for infrastructure are extensive. They are a result in insignificant funding by FEMA based on guidelines and discrepancies in City and FEMA estimates for repair. Since the City of Springfield will pursue the FEMA Alternate Process for Public Assistance Pilot-Program, these discrepancies will not be able to adjust during project execution and therefore are built into the project. These impacts to Springfield's infrastructure have resulted in 150 FEMA project worksheets obligated for FEMA DR-1994-MA, DR-4051-MA, DR-4028-MA and DR-1959-MA. In addition to FEMA Public Assistance the City received recovery support from FHWA, NRCS and MSBA, and these amounts are accounted for in information provided about "assistance received." Obligated recovery funds are approximately \$80,000,000. Not all infrastructure needs are covered FEMA expenses.

Streets, Sidewalks, Signs/Signals, and Fencing

Claims (referred to as "Project Worksheets") submitted to FEMA identify \$626,081 of estimated project amounts for sidewalks, fencing, and \$182,061 in estimated damage has been deemed eligible in Public Assistance funds for these roadway projects. In addition, the City experienced road damage of \$7.1 million due to heavy loading and excessive use by machinery during debris removal operations. These damages, which include scarring, cracking, raveling, and rutting, are not reimbursable by FEMA because they are an indirect result of the disasters.

Schools and Community Buildings

The June 2011 badly damaged two public schools that were in use (Dryden Elementary and Brookings Elementary), an empty school building (the Zanetti School), and an armory building that housed the South End Community Center. As a result of the extensive school damage, the City needed to establish two temporary modular schools. The City is using state school building funds, FEMA funds, and City debt service to repair Dryden Elementary and replace Brookings Elementary. In addition, the City has determined that both District 1 and District 2 would benefit from enhanced local school department presence in order to advance neighborhood stabilization goals, and plans acquisition of two vacant school buildings (one a former parochial school and the other a former charter school), to be used for a neighborhood-based middle school in District 1 and parent engagement and resource center in District 2.

In District 1, retaining a site for the South End Middle School is crucial to achieving the redevelopment and revitalization of the District. The existing facility (the former Mount Carmel

School) is currently leased, resulting in extra costs compared to school facilities that the City owns outright. There is no guarantee that lease will continue in perpetuity or that the lease fee will not increase. Therefore, an acquisition is planned with grant funds, to ensure that a middle school remains in the District and that students do not have to be bussed out of the neighborhood. Savings from avoiding lease fees and extra transportation costs will help ensure the long-term financial viability of the school, and ensure that an important anchor institution remains in the District. No rehabilitation of the structure is required.

In District 2, the City plans to purchase a small former charter school building on School Street for several reasons. First, the building is currently leased; like the building for the South End Middle School, the result is both higher costs and long-term uncertainty regarding the permanence of the location. Second, the building is used to house an important community facility—a Parent and Community Engagement Center (PACE). The full range of services delivered at the School Street School location include student registration, school assignments and transfers, English Language Learner, Special Education and Health assessments and services. In addition, the PACE Center houses several community outreach services including the Parent Resource Center (www.springfieldfamilysupport.org) which provides parents the tools necessary to assist in their children’s education and future, and classrooms for the Parent Academy (www.springfieldparentacademy.com) which provides training on parenting, assisting with homework, household budgeting and other subjects. Permanently locating PACE and the other programs in District 2 serves neighborhood revitalization goals by making these services particularly accessible to the very low-income residents of this District, many of whom do not have access to cars. In addition, District 2 parents commented at public hearings that children in the district were traumatized by experiencing a tornado while in their school buildings, and that a number are still struggling with PTSD. The location of the Parent Resource Center and Parent Academy in the District provides additional support to these families. No rehabilitation of the structure is required.

The South End Community Center is an important community resource in District 1. The City will use FEMA funds to build a new facility for this neighborhood anchor.

The tornado also damaged the City-owned Old First Church, and the Campanile, an iconic tower located between City Hall and Symphony Hall. The damage to the campanile exacerbated pre-existing damage, and is ineligible for FEMA funding because of the pre-existing damage. However, the added tornado damage has made repairs to the campanile all the more critical so that the structure is not lost.

Parks and Recreation Infrastructure

The tornado directly impacted seven parks, toppling mature trees, and destroying playground equipment, benches, lighting, fencing and other park infrastructure. A building was damaged at Camp Wilder. At Forest Park, rain gutters and the facility tent were damaged.

Public Health and Safety Infrastructure

The June 2011 tornado left behind numerous dangerous damaged structures, which needed demolition or emergency stabilization. The tornado and Hurricane Irene created potential public health issues, including mold due to moisture infiltration, and lead and asbestos hazards within destroyed buildings and storm debris. All of the storms required emergency response mobilization and deposited enormous quantities of debris, including trees and tree limbs, on both public and private property. Snow storms created extreme snow removal problems requiring emergency response.

Table 9: Summary of Unmet Infrastructure Needs

Major Unmet Needs Based on Damage Estimates Minus Assistance Received				
CATEGORY	PROJECT	ESTIMATE	FUNDING	UNMET NEED
Streets, Sidewalks, Signs/Signals, Fencing	Sidewalks and Curbing	\$550,000	\$125,000	\$425,000
	Fencing	\$33,372	\$25,029	\$8,343
	Replacement of signs and signals	\$42,709	\$32,032	\$10,677
	Road repairs	\$7,100,000	\$0	\$7,100,000
Schools and Community Buildings	Brookings and Dryden Schools	\$51,809,588	\$40,916,309	\$10,893,279
	Zanetti School	\$25,259,574	\$4,237,500	\$21,022,074
	Cathedral High School– Support Costs	\$500,000	\$0	\$500,000
	Armory (location of South End Community Center)	\$24,500,000	\$13,143,750	\$11,356,250
	Old First Church	\$118,485	\$90,529	\$27,956
	Campanile	\$20,000,000	\$0	\$20,000,000
Parks and Recreation Infrastructure	Camp Wilder	\$129,343	\$89,579	\$39,764
	Forest Park Buildings and Facilities	\$17,114	\$1,165	\$15,949
	Park Repairs (Riverfront, Court Square, Harriet Tubman, Johnny Appleseed, Leonardo DaVinci, Nathan Bill, Ruth Elizabeth)	\$565,165	\$492,123	\$73,042
	Replacement of Trash & Recycling Receptacles	\$11,947	\$8,960	\$2,987

Public Health and Safety Needs and Infrastructure	Debris and Snow Removal	\$32,684,221	\$23,153,135	\$9,531,086
	Demolition of 34 Unsafe Structures	\$1,382,586	\$1,038,197	\$344,389
	Emergency Response Mobilization	\$745,379	\$559,035	\$186,344
	Repairs to Shot Spotter, Police vehicles and equipment	\$85,013	\$63,760	\$148,773
TOTAL		\$154,553,665	\$83,976,103	\$59,055,679

Source: City of Springfield FEMA Project Worksheets

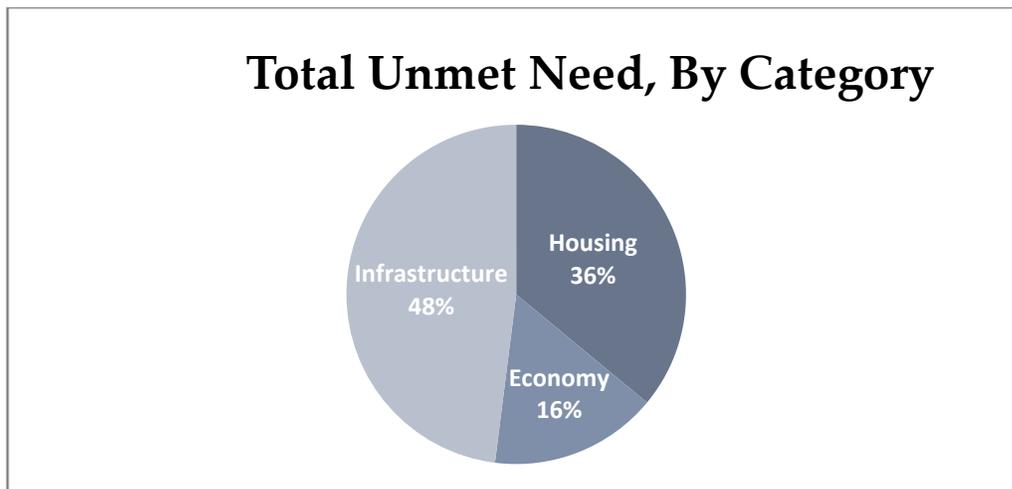
The amount of Infrastructure unmet need, as shown in the table above, is **\$59,055,679**. This number is shown in the summary chart on page 28.

Mitigation and Resiliency Measures

The City has undertaken planning to incorporate mitigation and resiliency measures into its recovery. Springfield’s Mitigation Plan has been submitted to the Massachusetts Emergency Management Agency (MEMA) and the Federal Emergency Management Agency (FEMA), and is awaiting approval by those agencies. Because the plan has not yet been approved, the City is not committing funds from this initial Partial Plan A for mitigation and resiliency measures in the plan. Future action plans will address these needs.

Summary of Unmet Need

The following chart and table summarize Springfield’s unmet disaster needs in the three sectors of housing, economy, and infrastructure.



SUMMARY: Estimate of Unmet Needs				
	Tornado-Related Need	FEMA, Insurance Proceeds, and other Government Program Funds Dispersed to Address Tornado Needs	Remaining Unmet Need	Percent of Unmet Need in Each Category
Housing	\$70,755,000	\$27,146,708	\$43,608,292	36%
Economy	\$40,781,633	\$20,614,503	\$20,167,130	16%
Infrastructure	\$154,553,665	\$83,976,103	\$59,055,679	48%
TOTAL	\$266,090,298	\$131,737,314	\$122,831,101	100%

Springfield’s recovery effort must focus not only on economic recovery, but also neighborhood and economic revitalization, which is not captured in the above analysis. CDBG-DR funds must begin to address these unmet needs as well. Although Springfield has an estimated \$134,352,984 in unmet building, infrastructure and community facility needs, there is an urgent need to revitalize extremely poor neighborhoods hit by the June 2011 tornado, and to stimulate economic activity.

SECTION 3: SPRINGFIELD'S GOALS, OBJECTIVES, AND RECOMMENDATIONS FOR LONG-TERM RECOVERY

At two years post-tornado, the City has witnessed the uneven recovery that has taken place: middle-class homeowner neighborhoods have been substantially rebuilt with homeowners insurance payments, while neighborhoods that were in distress prior to the tornado have experienced further abandonment and delay in recovery. The City intends to use CDBG-DR funds not only to address lingering individual disaster recovery needs, but also to revitalize the distressed neighborhoods that are slow to recover.

In October 2011 through March 2012, the City undertook a public planning process, led by the Springfield Redevelopment Authority and Rebuild Springfield, to create a long-term recovery plan for the City of Springfield. The process, led by the New Orleans-based firm Concordia, Inc., engaged over 3000 citizens in community visioning and master planning. The planning process was predicated on the need to undertake sustainable long-term recovery planning, in order to provide a basis for undertaking responsible land use and building decisions.

The result of the process is a two-part plan: 1) a City-wide plan that makes recommendations in the Educational, Physical, Cultural, Social, Economic, and Organizational domains; and 2) master plans for the three tornado-impact districts.



Disaster Response Planning

Since 2011, the City has undertaken additional disaster response planning and exploration of mitigation opportunities. Springfield developed its original Hazard Mitigation Plan in 2012, and it adopted a new Flood Plain Ordinance in 2013 to accommodate FEMA's new Flood Insurance Rate Mapping. The City has revised its disaster shelter plan, and has significantly upgraded its emergency Operations Center's capabilities in 2013.

The Rebuild Springfield Plan: Housing and Infrastructure

The physical master plan set forth in the Rebuild Springfield Plan includes approximately \$80 million of improvements to the tornado-damaged areas. The City envisions these plans to be a long-term blueprint for recovery, to be funded through a variety of public sources and private investment. The City proposes to use the allocation of CDBG-DR funds to invest in a number of catalytic projects in tornado-damaged neighborhoods that have been subject to long-term disinvestment. The City is using these public investments in severely damaged and long-distressed neighborhoods as a means of improving living conditions in these neighborhoods, and in order to attract private investment—in housing and business—into the neighborhoods.



District 1

District 1's retail and commercial base has enabled it to experience greater recovery than District 2, but the South End is also a low-income neighborhood that has been subject to years of disinvestment. The South End has been the subject of a focused revitalization effort and targeted investment since 2007. Fortunately, major improvements of recent years survived the tornado with little or no damage, and investments that were in the

planning stages pre-tornado have been able to assist this neighborhood's recovery. These include planned improvements to Dwight Street Extension and the rehabilitation of Outing Park Apartments, Main Street façade improvements, and the expansion of Caring Health Center into a formerly vacant building. A neighborhood anchor, Square One early childhood education center, has recently been able to return to the neighborhood even though its building and offices were destroyed in the tornado.

Currently, the South End is a potential site for an \$800 million casino. While the casino site still needs to be selected by the Massachusetts Gaming Commission, the potential for its siting has already impacted the neighborhood, and the scale of the neighborhood improvements that the casino project will bring if approved dwarf public construction projects that the City could fund for neighborhood revitalization. Because of both the recent and sustained public investment in the South End and the likely investment that would accompany a new casino, a moderate amount of CDBG-DR funds are allocated to District 1.

The following CDBG-DR projects are planned for the South End:

- Demolition of blighted properties;
- Paving of damaged side streets within the tornado zone;
- Purchase of the Mount Carmel School (to be used as the South End Middle School);
- Assistance to small businesses;
- Housing repair, as is still needed; and
- Possible roadway realignment and/or housing redevelopment, as are necessary for the new South End Community Center.

These projects will be complimented by the following projects that will be paid for with other funding sources:

- Construction of a new South End Community Center; and
- Completion of revitalization/renovation of the Hollywood Apartment buildings.

District 2

The District 2 neighborhoods, Six Corners and Old Hill, experienced tremendous tornado devastation. This area, low in homeownership and with little business investment, has been slow to recover. Investor-occupied homes have been abandoned, homeowners with few resources have been unable to rebuild, and multiple public and subsidized housing complexes have lacked the resources needed for recovery. Due to this District's difficulty in experiencing a full recovery, it has been designated as a major priority for CDBG-DR funding.

Central Street's empty spaces will be transformed into a vibrant residential neighborhood.



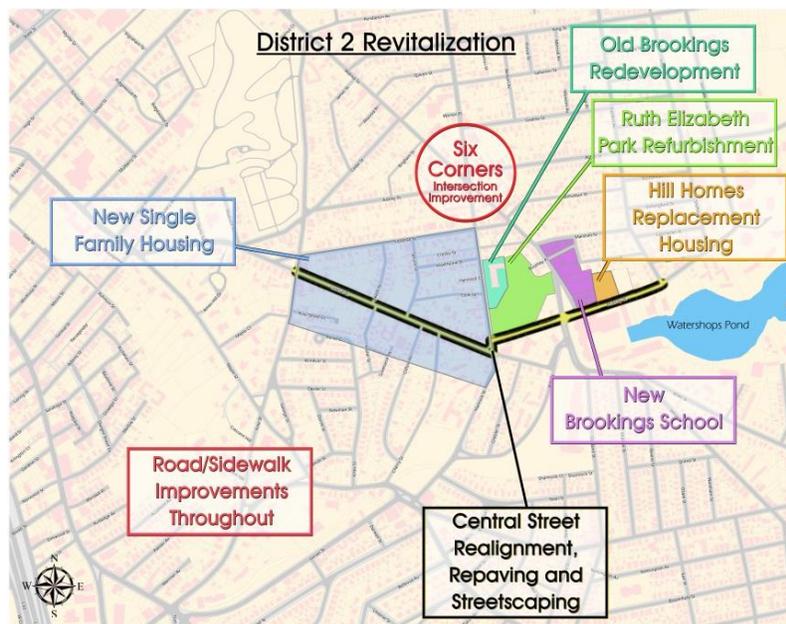
The following catalytic projects are planned for Six Corners and Old Hill:

- Development of infill single-family homeownership opportunities;
- Demolition of blighted properties throughout the tornado-impacted neighborhoods;
- Realignment of Central Street to flow into Hickory Street, eliminating the poorly-designed intersection at Rifle and Allen Streets;
- Paving, sidewalks and streetscaping of Central Street from Pine Street to Walnut;
- Paving of damaged side streets within the tornado zone;
- Redesign of the Six Corners intersection, to improve safety and traffic flow;
- Retail improvement/redevelopment;
- Redevelopment of Hill Homes Apartments;
- Purchase by the City of the School Street School, to be used by Springfield Public Schools as the Parent Information Center (PIC), the Parent and Community Engagement Center (PACE), and the Parent Academy;
- Assistance to small businesses; and
- Housing repair, as is still needed.

These projects will be complimented by projects that will be paid for with other funding sources:

- Construction of the new Elias Brookings School;
- Refurbishment of Ruth Elizabeth Park; and
- Expected repurposing of the old Brookings School building.

The annotated map below illustrates the components of the District 2 revitalization.



District 3

District 3 has experienced an almost complete recovery in its housing sector, and other sources of funding will enable rebuilding of the Dryden Elementary School, and the Catholic Diocese has committed to rebuild Cathedral High School. Lingered needs in this district are associated with parks and open space, which experienced tremendous devastation in the 2011 tornado, and also impacted by the other 2011 disasters. Residents in these neighborhoods emphasized the need to address these neighborhood amenities in the rebuilding process.

The following CDGB DR projects are planned for District 3:

- Refurbishment/redevelopment of Nathan Bill Park;
- Assistance to small businesses; and
- Housing repair, as is still needed.

These projects will be complimented by the following project that will be paid for with other funding sources:

- Reconstruction of the Mary Dryden Elementary School.

The Rebuild Springfield Plan: Economic Revitalization

Restoring economic vitality to Springfield's businesses and communities is essential for the City's long-term economic recovery and revitalization. Accomplishing this goal requires opportunities to recover from losses and to spark new economic activity within communities.

The City will undertake a number of economic initiatives as part of its recovery, which have included, or will include:

- Focusing on economic revitalization;
- Providing financial assistance to eligible small businesses;
- Providing workforce training;
- Undertaking urban renewal activities in District 2;
- Addressing infrastructure improvements in commercial/retail corridors;
- Restoring public parks and recreational facilities; and
- Restoring public streetscapes and public spaces.

Recovery Planning Informed by Post-Disaster Evaluation of Hazard Risk

As required by HUD, the City has considered the need to promote sound, sustainable long-term recovery in its planning, which includes planning informed by post-disaster evaluation of hazard risk, especially land-use decisions that reflect responsible flood plain management. The City did not experience flooding in the covered disasters, and both tornados and severe flooding are rare in this location. Nonetheless, the City has been working with the Army Corps

of Engineers to take precautionary measures, including proper maintenance of the City's dike system.

Consistency with Local and Regional Planning Efforts

Springfield is working closely with the Massachusetts Emergency Management Agency and the Pioneer Valley Planning Commission on regional and state-wide planning for disaster planning, management and mitigation. These efforts combine to create coordinated disaster planning.

Provision of Disaster-Resistant Housing for All

The City of Springfield is committed to the provision of housing for all income groups that is disaster resistant. All newly constructed or substantially rehabilitated housing units must meet all locally adopted and enforced building codes, standards, and ordinances. Springfield has adopted the 2009 International Residential Code, which provides for quality, durable, energy efficient and mold resistant construction.

The City has existing programs that provide homeless prevention and rapid re-housing assistance to individuals and families at risk of homelessness and individuals and families experiencing homelessness. In response to the tornado, the City, partner provider agencies and landlords quickly made these resources readily available to households displaced by the tornado, and were able to permanently rehouse approximately 300 displaced households within 90 days of the disaster. The City and its partners continue to provide these services, which are still available to households in need.

The local Continuum of Care (CoC) and its members have created over 200 units of permanent supportive housing over the past ten years, and continue to add more of these units each year. Within this inventory, there are permanent supportive housing units for both individuals and families. CoC member agencies meet regularly to triage people who are currently homeless and connect those persons with available housing units, including available permanent supportive housing units for persons with disabilities.

There are a number of programs in the City to address the housing needs of special populations, including those with HIV/AIDS, persons with drug and alcohol dependencies, the elderly, and public housing tenants. Springfield uses Housing Opportunities for Persons with AIDS (HOPWA) funding to provide rapid rehousing and tenant-based rental-assistance for the HIV positive population. The City has an extensive network of supportive programs—including residential treatment, half-way houses, and sober living houses—for persons with alcohol or drug dependence. Within the City, there are several housing complexes designated for elderly persons, and support services are provided at those complexes. In addition, Greater Springfield Senior Services provides supportive services to seniors living on their own. The Springfield Housing Authority has introduced multiple programs to address the special needs

of its population, including programs for early literacy, support services for formerly homeless families, and programs designed to assist residents to become self-sufficient. SHA has an active Section 8 homeownership program.

As detailed in the needs assessment, the tornado heavily impacted several very low-income neighborhoods made up predominantly of persons of color. These neighborhoods—the South End, Six Corners, and Old Hill—have experienced the greatest barriers to recovery. As the City undertook planning to address disaster recovery, the City has prioritized these neighborhoods for assistance. In the planning process, the City has considered how new investment in these areas may improve opportunity for existing residents. At the same time, the City’s goal is to not contribute further to concentrations of poverty in these neighborhoods. The result has been a commitment to invest heavily in infrastructure, economic development, and creation of housing affordable to households up to 120% area median income in distressed neighborhoods. The City is working with the Springfield Housing Authority to identify sites for replacement housing in neighborhoods within the City which have greater opportunity and are not neighborhoods of concentrated poverty.

The City has updated its Analysis of Impediments to Fair Housing in 2013, and will use the recommendations from that analysis to ensure that its plans address the City goals of improving neighborhoods of distress, and providing residents access to neighborhoods and communities of opportunity.

Leverage

Springfield will leverage its CDBG-DR funds with other federal and non-federal funding sources to maximize the impact of disaster relief monies and prevent duplication of benefits. The City has programmed CDBG-DR funds to address funding needs not satisfied by other funding sources such as FEMA Individual Assistance grants, SBA Disaster Loans and private insurance. The City also plans to leverage its CDBG-DR dollars with funding from the FEMA Public Assistance and Hazard Mitigation Grant Programs. CDBG-DR funds will complement, not supplant, these resources.

Many of the activities to be carried out under this Action Plan will have multiple funding streams. Other types of funding that will be accessed to carry out these activities include state housing funds, tax credit equity, state road and public works funds, and foundation and corporate contributions. The additional sources expected for each activity are detailed in the activity descriptions, which start on page 38.

In addition, through an ongoing focus toward developing and strengthening public-private partnerships with corporations, foundations, nonprofits, and other stakeholders, Springfield will assist and integrate efforts of organizations active in the recovery.

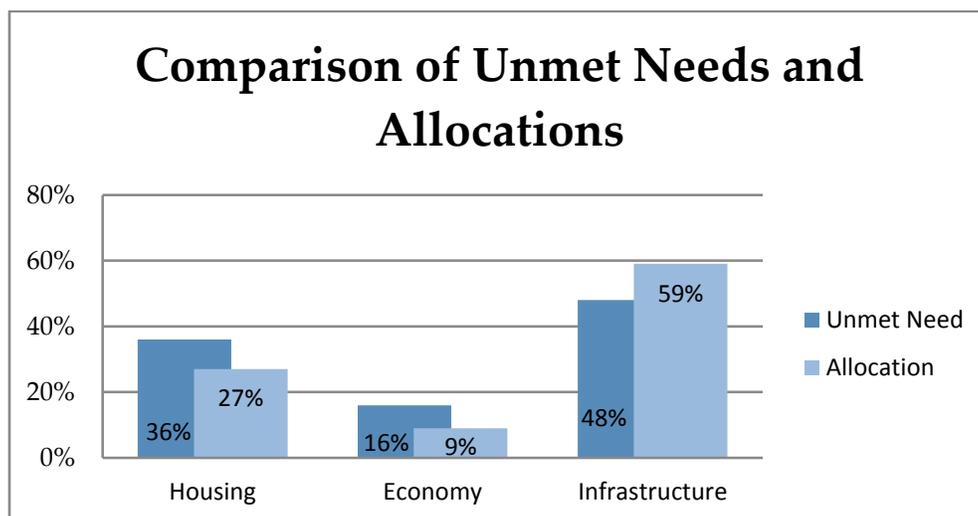
SECTION 4: DISTRIBUTION OF CDBG-DR FUNDS

Based on the unmet needs assessment in Section 2 and input from impacted communities in the Rebuild Springfield and Action Plan processes, Springfield has prioritized a portfolio of programs that will assist in meeting the short- and long-term recovery needs of its residents and communities. While the impact of the storm was much greater than the resources available under the initial HUD allocation, these programs will begin to address the unmet needs in owners' primary residences and rental housing, economic recovery and revitalization, infrastructure, environmental needs and public services activities.

The Disaster Relief Appropriations Act of 2013 requires that all CDBG-DR funded activities address an impact of the disaster for which funding was appropriated. The CDBG-DR provisions require that each activity: (1) be CDBG eligible (or receive a waiver), (2) meet a national objective as defined by 24 CFR 570.483, and (3) address a direct or indirect impact from the disaster in counties declared by the President to have been impacted by the disaster. A disaster impact can be addressed through a number of eligible CDBG activities listed in Section 105(a) of the Housing and Community Development Act of 1974, as amended.

The recovery activities herein will make full use of the three national objectives under 24 CFR 570.483 which include benefitting low and moderate income persons, preventing or eliminating slums or blight, and meeting urgent needs to implement a robust and comprehensive recovery for the residents of Springfield.

The graph below illustrates the relationship between identified unmet needs and the City's allocation of its CDBG-DR allocation.



While the City's allocation of resources is proportional to the amount of need in each category, the percentages are not an exact match. The City has allocated less to the category of Housing than the amount of unmet need calculated. The reason for this discrepancy is that there has been such a low number of households identifying actual continuing unmet need for recovery, which the City believes is due to a tremendous amount of donated funds and labor dedicated to recovery, as well as state assistance provided that has not been quantified for the City and therefore is not incorporated into the calculation of unmet needs. The City has allocated more to the category of Infrastructure than the amount of unmet need. The City has done this to address long-standing infrastructure gaps in the very-low income neighborhoods hardest hit by the tornado, in order to support neighborhood and economic revitalization in those neighborhoods. Finally, there is a small discrepancy between the need and allocation for the Economy. While the numbers reflect a smaller allocation to business than is justified by unmet need, the City believes that its extensive infrastructure commitments are also supportive of business and economic development.

Per HUD guidance the City of Springfield will spend at least 50% of its CDBG-DR entitlement to benefit people of low to moderate income. The balance of the funding will be used for activities addressing Urgent Need and the prevention or elimination of slums or blight.

Unless otherwise stated or expanded upon in the program descriptions below, the various types of tornado recovery assistance will be provided generally on a first-received, first-evaluated basis until all available funds are obligated. The City will conduct outreach as applicable and reasonable in both English and Spanish regarding the availability of programs and encouraging applications. This outreach will be conducted shortly after HUD approval of the Action Plan and will encourage households, and businesses and communities with unmet needs to apply.

All HUD regulations regarding lead-based paint, asbestos removal, environmental, housing quality standards, procurement and other applicable standards apply to these programs. Details of proposed programs are below.

While the City encourages consideration of mitigation measures in all rebuilding activities, the City has not directly allocated any CDBG-DR funds for projects that address mitigation only. As a result, the City does not include an analysis of whether mitigation measures are a necessary expense related to disaster relief or recovery.

Activity 1: Acquisition and Development for Homeownership

The City will provide funds to qualified developers to acquire vacant lots and develop single-family homes on the lots.

Partial Plan A Allocation for Activity: \$1,450,000

Eligible Applicants: Private for-profit and nonprofit housing developers capable of developing single-family homes and selling the homes to eligible home buyers. Developers must be capable of complying with all federal regulatory requirements and must develop homes that will contribute to neighborhood revitalization.

Eligibility Criteria:

- Development must take place on vacant residential lots within the tornado-impacted neighborhoods of Six Corners, Old Hill and the South End.

Criteria for Selection: Request for proposals process, which will evaluate: Proposer History and Capacity; Project Feasibility; Achievement of Public Policy Goals; Readiness to Proceed; Direct Financial Benefit to the City; and Ability to Comply with CDBG-DR Requirements and Timelines.

Geographic Area: Districts 1 and 2

Eligibility: 24 C.F.R. § 570.204(c)

National Objective: Low/Moderate Income Housing

Outcome: 7 single-family homes

Start Date: November 1, 2013 **End Date:** October 31, 2015

Schedule: The City is currently identifying parcels for single-family home development, and the Office of Housing will issue one or more Requests for Proposals (RFPs) for developers shortly after approval by HUD of this Partial Action Plan A. RFPs will indicate that homes must be fully complete within 12 months of the developer entering into a contract to develop.

Waiver: The City notes that the March 5, 2013 Federal Register notice (FR-5696-N-01) section VI paragraph 28 provides a waiver of the requirements of 42 U.S.C. § 5305(a) as necessary to allow: homeownership assistance with up to 120 percent of area median income; and new housing construction. The City intends to make use of this waiver to carry out this activity.

Expected Leverage: City of Springfield land, MA Affordable Housing Trust Fund, MA Housing Stabilization Fund, construction debt, home purchase price.

Activity 2: Removal of Blight

The City, through its Office of Housing, will demolish blighted properties in tornado-impacted neighborhoods. The City will use a public bidding process to select demolition firms to carry out this work.

Partial Plan A Allocation for Activity: \$600,000

Geographic Area: Districts 1, 2 and 3

Eligibility: 24 C.F.R. § 570.201(d)

National Objective: Low/Moderate Income Area Benefit, Urgent Need

Outcome: Demolition of 12 structures

Start Date: November 1, 2013

End Date: October 31, 2015

Schedule: The initial 12 structures (all located in Districts 1 and 2) have been identified, and are either owned by the City through tax foreclosure or are subject to court orders allowing the City to demolish. The City's Office of Housing will issue an RFP for one or more demolition contractors to undertake the demolition work upon HUD approval of this Action Plan A.

Urgent Need: Property abandonment throughout tornado-impacted neighborhoods has left vacant blighted buildings which create safety hazards in the neighborhoods. The City will use the Urgent Need objective for any properties which are in the tornado zone but are not in the CDBG target areas.

Expected Leverage: City bond funds, FEMA.

Activity 3: Housing Repair

The City will provide 0% interest forgivable loans to homeowners to make repairs to tornado-related damages to their home.

Partial Plan A Allocation for Activity: \$300,000

Maximum Award: \$50,000

Eligible Applicants: Homeowners whose primary residences sustained substantial, severe or major damage from the June 2011 tornado, and who have unmet rehabilitation needs. The residence must be located in one of the five most impacted neighborhoods.

Eligibility Criteria:

- Home must have been owner-occupied at the time of the storm;
- Home must have served as primary residence;
- Home must have been in one of the five most impacted and distressed neighborhoods;
- Homeowner must have been registered with FEMA; and

- Homeowner must have a household income at or below 80% area median income.

Criteria for Selection: First-come, first-served.

Geographic Area: Districts 1, 2 and 3

Eligibility: 24 C.F.R. § 570.202

National Objective: Low/Moderate Income Housing, Urgent Need

Outcome: 10 homes

Start Date: November 1, 2013

End Date: October 31, 2015

Schedule: The City's Office of Housing is already undertaking outreach to impacted homeowners who may still need assistance, and has designed the program and paperwork to be used for the program. The Office of Housing will begin approving applications as soon as HUD approves this Partial Action Plan A. Outreach will continue throughout the program.

Urgent Need: Some homeowners have been unable to complete repairs to their homes due to non-existent or inadequate insurance coverage and an inability or unwillingness to access SBA loans. The City will use the Urgent Need objective for any properties which are in the tornado zone but are not in the CDBG target areas.

Expected Leverage: Massachusetts Housing Investment Corp (MHIC), Attorney General's Office Old Hill neighborhood homeownership repair program, State Street Alliance Curb Appeal funds (private/corporate investment), volunteer labor and donated materials from Rebuilding Together, Springfield Homeowner Emergency Repair Program.

Activity 4: Replacement of Multi-family Housing

The City will provide predevelopment and/or gap funding to developers of replacement multi-family affordable housing.

Partial Plan A Allocation for Activity: \$500,000

Maximum Award: \$50,000 per unit

Eligible Applicants: Private for-profit and nonprofit housing developers and public housing authorities capable of developing and managing large multi-family developments.

Eligibility Criteria: Projects must replace affordable rental units lost due to the June 2011.

Geographic Area: For replacement of affordable multi-family housing units that were located in Districts 1 and 2; these units were located in the following properties: MHA's Union Street Apartments; Hill Homes Cooperative Housing; and the SHA duplexes and the multifamily property at 425 Central Street. Although the destroyed units were

located in Districts 1 and 2, the replacement units may be located on existing sites or elsewhere in the City.

Eligibility: 24 C.F.R. § 570.208

National Objective: Low/Moderate Income Housing

Outcome: 13 units

Start Date: November 1, 2013

End Date: October 31, 2015

Schedule: This initial allocation includes \$100,000 for MHA, which will then be a fully funded project and is scheduled to begin construction of replacement units in fall 2013. The remainder of this allocation is to fund early-stage development costs for SHA and/or Hill Homes, neither of which has settled on a location or development plan for new units at this time. It is expected that there will be future allocations in this category as development plans and needs progress.

Urgent Need: Public and HUD-subsidized housing was destroyed in the tornado and insurance and FEMA/SBA funds do not provide sufficient resources to replace the units.

Definition: For the purpose of the waiver referenced in the March 5, 2013 Federal Register notice (FR-5696-N-01) section VI paragraph 19 (a) (regarding one-for-one replacement requirements), the City defines the term “not suitable for rehabilitation” as any structure deteriorated beyond repair or a structure where the costs of rehabilitation would exceed 50% of the estimated appraised value of the property.

Expected Leverage: Low Income Housing Tax Credit equity, Historic Tax Credit equity, MA Affordable Housing Trust Fund, MA Housing Stabilization Fund, MA HOME funds, City of Springfield HOME funds, Federal Home Loan Bank Board, construction and permanent debt.

Activity 5: Workforce Training

The City, through its Department of Planning and Economic Development, will make funds available to service providers for workforce training activities.

Partial Plan A Allocation for Activity: \$250,000

Maximum Award: \$100,000

Eligible Applicants: Service providers that provide employment training to residents in effected neighborhoods of disaster

Eligibility Criteria:

- Experienced service providers of job training activities;
- Providers that have worked or will work in the effected neighborhood; and
- Programs that provide clear links from training to employment.

Criteria for Selection: Request for Proposals, competitive review process based upon experience and past success and likelihood of providing training and employment opportunities to effected residents

Geographic Area: Districts 1, 2 and 3

Eligibility: 24 C.F.R. § 570.201 (e)

National Objective: Low/Moderate Income Limited Clientele

Outcome: Job training for a minimum of 100 Springfield residents

Start Date: November 1, 2013

End Date: October 31, 2015

Schedule: The Office of Planning & Economic Development will release a Request for Proposals (RFP) seeking one or more providers of workforce training activities shortly after approval of this Action Plan A. The city will seek providers that will target training of residents of effected neighborhoods for work reentry. The city would release the RFP approximately 60 days after Action Plan Approval and look for awards in spring 2014 with immediate implementation. Project completion would be expected by spring 2015.

Expected Leverage: State workforce training funds, provider funding/in kind action.

Activity 6: Business Recovery Loan Program

The City, through its Department of Planning and Economic Development, will make funds available to small businesses to assist in recovery and business growth.

Partial Plan A Allocation for Activity: \$500,000

Maximum Award: \$100,000

Eligible Applicants: Small Businesses & Non-Profits demonstrating the need for assistance and the opportunity for growth

Eligibility Criteria:

- Applicants that sustained physical or economic loss due to disaster;
- Applicants meeting the definition of small business at 13 CFR part 121 with a minimum of \$25,000 and a maximum of \$5 million in annual revenue; and
- Home-base businesses excluded.

Criteria for Selection: First come, first served. Application process will include administrative review by third party community lending agency.

Geographic Area: Districts 1, 2 and 3

Eligibility: 24 C.F.R. §§570.201, 570.202, 570.203

National Objective: Low/Moderate Income Area Benefit, Urgent Need

Outcome: Assistance to a minimum of 10 businesses

Start Date: November 1, 2013

End Date: October 31, 2015

Schedule: The city would contract with an experienced non-profit community loan fund, with access to additional loan capital, to underwrite, originate and service small business loans for effected and existing businesses within the affected area. The loan program will begin 60 days after Action Plan approval, and outreach will be done by city staff as well as the third party provider via public meetings, door to door, media, and websites.

Urgent Need: Small businesses in the City incurred tornado-related losses which are not covered by insurance and for which SBA loans were not accessed; this program will ensure that these business can continue operations and growth. The City will use the Urgent Need objective for any properties which are in the tornado zone but are not in the CDBG target areas.

Expected Leverage: Third-party provider funding and staffing, potential matching funding from other public sources.

Activity 7: Redevelopment

The City, through its Department of Planning and Economic Development, will undertake planning and initial implementation of redevelopment activities.

Partial Plan A Allocation for Activity: \$500,000

Program Goals:

- Planning activities for effected neighborhoods;
- Economic and reuse analysis for redevelopment opportunities; and
- Targeted property acquisitions and redevelopment for reduction of slum or blight.

Geographic Area: District 2

Eligibility: 24 C.F.R. §§ 570.201, 570.205

National Objective: Low/Moderate Income Area Benefit

Outcome: Removal of slum or blight

Start Date: November 1, 2013

End Date: October 31, 2015

Schedule: The city will undertake an enhanced economic development and planning study of key locations where infrastructure and other dollars are planned, to best maximize investment and economic opportunity. Tasks will include analysis of sites and feasibility. The city has organized with DevelopSpringfield and International Economic Development Council for a Fall 2013 effort to identify opportunity sites for redevelopment and business and job creation activities. This report, along with existing

data and recent studies, will help inform the city as to targeted property redevelopment projects. It is expected that identification of sites will be complete in early 2014 with activities beginning in mid-2014.

Expected Leverage: State and Federal grant funding (EPA, EDA, Massworks).

Activity 8: Roadways and Sidewalks

The City, through its Department of Public Works, will undertake roadway design, reconstruction, repaving, streetscaping and replacement of sidewalks in tornado-impacted neighborhoods.

Partial Plan A Allocation for Activity: \$5,070,000

Criteria for Selection: Roadways and sidewalks in the tornado zone, selected by the City.

Geographic Area: Districts 1 and 2

Eligibility: 24 C.F.R. §570.201(c)

National Objective: Low/Moderate Income Area

Outcome: 46,500 linear feet of roadway; 9,500 linear feet of sidewalk

Start Date: November 1, 2013

End Date: October 31, 2015

Schedule: A portion of these funds is for design of roadway realignment projects; and design work is ready to begin as soon as this Partial Action Plan A is approved. The other part of these funds is for repaving and construction of sidewalks. For the construction portion, streets and sidewalks have been selected, and the City's Department of Public Works is ready to seek bids on these projects as soon as this Action Plan A is approved by HUD.

Expected Leverage: Projects are done in coordination with annual street and sidewalks projects that include city and state funding, including state Chapter 90 dollars.

Activity 9: Parks

The City, through its Parks Department, will fund park reconstruction and improvements.

Partial Plan A Allocation for Activity: \$536,000

Criteria for Selection: Redevelopment of parks in the tornado zone.

Geographic Area: District 3

Eligibility: 24 C.F.R. §570.201(c)

National Objective: Low/Moderate Income Area, Urgent Need

Outcome: 1 park

Start Date: November 1, 2013

End Date: October 31, 2015

Schedule: The City has completed schematic design for the Nathan Bill Park, are in the process of preparing final design and bid specifications. The Park Department will bid the park construction by March 2014. Construction will begin June 2014 and completed early spring 2015.

Urgent Need: The June 2011 damaged or destroyed park equipment and buildings, and the costs to rebuild are not fully covered by FEMA and insurance. The City will use the Urgent Need objective for any properties which are in the tornado zone but are not in the CDBG target areas.

Expected Leverage: City of Springfield general revenue.

Activity 10: Schools

The City of Springfield, through its Finance Division, will purchase two intact and undamaged school buildings located in the tornado zone, in order to assure the continuation and better functioning of two crucial educational facilities and meet needs for classroom space. As described in Section 2, this will enable the South End Middle School to remain in District 1 as a crucial anchor institution for revitalization, and provide a suitable permanent home in District 2 for a for The Parent and Community Engagement Center (PACE) and the Parent Academy, which brings important educational support resources to the City and, by locating in District 2, makes these resources easily accessible to the very low-income residents of this District.

Partial Plan A Allocation for Activity: \$3,700,000

Criteria for Selection: Identified needs and feasibility for classroom/resource space

Geographic Area: Districts 1 and 2

Eligibility: 24 C.F.R. § 570.201(a)

National Objective: Low/Moderate Income Area Benefit

Outcome: 1 school and 1 building

Start Date: November 1, 2013 **End Date:** March 31, 2014

Schedule: The buildings have already been identified: the Mount Carmel School building, currently being leased for use as the South End Middle School; and the School Street School, currently being leased for use as the Parent and Community Engagement Center (PACE), in the Six Corners neighborhood. The City expects to complete a voluntary acquisition and purchase the buildings in the final quarter of 2013 or first quarter of 2014.

SECTION 5: PERFORMANCE SCHEDULE AND METRICS

Springfield will enter its Action Plan into HUD's Disaster Recovery Grant Reporting (DRGR) System, where it will include detailed performance metrics and performance schedule. The performance metrics will be based on quarterly expected expenditures and outcomes. DRGR quarterly reports will be posted on the City's website so that the public can access information about plan progress.

The table on the next page illustrates the currently estimated outcomes per funding category. These estimates are preliminary and may change. Factors that may affect performance measures include completing federally required environmental and historical reviews, contractor availability, weather, and availability of other funding sources.

At this time, Springfield is committing \$13,906,000, or 64%, of its allocation from its allocation of CDBG-DR funding for the programs listed in this Action Plan. The City is committed to spending these funds within 24 months of obligation. The City plans to submit one or more Substantial Amendments to this Action Plan to commit remaining funds as projects progress to shovel-ready status. The chart on the next page indicates the planned use of both currently-committed CDBG-DR funds and those that the City plans to commit in one or more future Partial Action Plans.

Category	Activity	Partial Action Plan A	Future Action Plan(s)	Total CDBG DR funds	% of CDBG-DR grant	Partial Action Plan A Performance Number	Performance Metric	Districts
Housing	1. Acquisition and Development for Homeownership	\$1,450,000				7	Units (Homes)	1, 2
	2. Removal of Blight	\$600,000				12	Units (Houses)	1, 2, 3
	3. Housing Repair	\$300,000				10	Units (Homes)	1, 2, 3
	4. Replacement of Multi-Family Housing	\$500,000				13	Units (Housing Units)	1, 2
	HOUSING TOTAL	\$2,850,000	\$3,050,000	\$5,900,000	27%			
Economy	5. Workforce Training	\$250,000				100	People	1, 2, 3
	6. Business Recovery Loan Program	\$500,000				10	Businesses	1, 2, 3
	7. Urban Renewal	\$500,000					n/a	2
	ECONOMY TOTAL	1,250,000	\$750,000	\$2,000,000	9%			
Infrastructure	8. Streets and Sidewalks	\$5,070,000				46,500 ft. 9,500 ft.	Roadway Sidewalks	1, 2
	9. Parks	\$536,000				1	Park	3
	10. Schools	\$3,700,000				2	School Buildings	1, 2
	INFRASTRUCTURE TOTAL	\$9,306,000	\$3,600,000	\$12,906,000	59%			
Admin.	Administration	\$500,000				n/a	n/a	n/a
	ADMINISTRATION TOTAL	\$500,000	\$590,000	\$1,090,000	5%			
	CDBG-DR TOTAL	\$13,906,000	\$7,990,000	\$21,896,000	100%			

SECTION 6: REBUILDING STANDARDS

Replacement of Affordable Housing

As detailed in the section on impact and unmet need, Springfield lost a total of 74 units of affordable housing in the tornado. (The destroyed projects are listed in Table 3 on page 17.) The City has consulted with the Springfield Housing Authority and the owners of the HUD-subsidized units, and intends to be a partner in the rebuilding of these units. Funds are included in this Partial Action Plan A, and are expected to be included in future Action Plan(s) to meet funding gaps in these projects. Specifically, this plan includes \$100,000 to assist the Mental Health Association (MHA) in rebuilding the destroyed 13 units of permanent supportive housing on a parcel of land already conveyed to MHA by the City. MHA has identified full funding for new construction replacement housing, to be located on Magazine Street, and for which construction will begin fall 2013. The full cost of the project is \$3.2 million, of which \$2.2 million will be paid with insurance proceeds, and the remainder will come from other grants and loans.

The Springfield Housing Authority (SHA) is considering various alternatives for the replacement of the 8 units at 425 Central Street and the three duplexes on Melrose and Eastern (14 units total). The City has been in conversation with SHA regarding both CDBG-DR funding and the possibility of City-owned property for these units, and will continue to work with SHA to ensure that the destroyed units are replaced.

The City has offered technical assistance to Hill Homes Cooperative Housing for the rebuilding of this project's 26 units, and intends to make CDBG-DR funds available for this purpose. The owners of Spring Hill Apartments have elected not to rebuild the destroyed 21 units, and the City has entered into a written agreement with HUD and the owners of Spring Hill Apartments for the City to replace the units at another location within three years. The City plans to use HOME funds and other resources to build the Spring Hill replacement units.

Promotion of High Quality, Durable, Energy Efficient, and Mold Resistant Construction Methods

Newly constructed or substantially rehabilitated housing units must meet all locally adopted and enforced building codes, standards, and ordinances. Springfield has adopted the 2009 International Residential Code, which provides for quality, durable, energy efficient and mold resistant construction. Housing rehabilitation and reconstruction activities will be designed to achieve maximum energy efficiency to the extent achievable on a cost-effective basis, considering construction and operating costs over the life cycle of the structure. Efficiency may be demonstrated through design based on LEED, ENERGY STAR™, and/or other comparable guidelines and rating systems. Construction methods should comply with local building codes

and incorporate mold resistant construction materials. The City will encourage subrecipients, where feasible, to follow best practices such as those provided by the U.S. Department of Energy Home Energy Professionals: Professional Certifications and Standard Work Specifications.

Green Building

Springfield will require new construction and replacement of substantially damaged residential buildings (*i.e.*, where repair costs exceed 50% of replacement cost) to meet green building standards by meet an industry-recognized standard that has achieved certification under at least one of the following programs: (i) ENERGY STAR (Certified Homes or Multifamily High Rise); (ii) Enterprise Green Communities; (iii) LEED (NC, Homes, Midrise, Existing Buildings O&M, or Neighborhood Development); (iv) ICC-700 National Green Building Standard; or (v) EPA Indoor AirPlus (ENERGY STAR a prerequisite)

For rehabilitation of non-substantially damaged residential buildings (where the repair costs are less than 50% replacement cost), Springfield will require compliance with the guidelines specified in the HUD CPD Green Building Retrofit Checklist (available on the CPD Disaster Recovery Web site). The guidelines will apply to the extent applicable to the rehabilitation work undertaken, including the use of mold resistant products when replacing surfaces such as drywall. When older or obsolete products are replaced as part of the rehabilitation work, rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program (FEMP)-designated products and appliances. Rehabilitated housing may also implement measures recommended in a Physical Condition Assessment (PCA) or Green Physical Needs Assessment (GPNA).

The City will implement green infrastructure policies to the extent practicable, relying on tools and suggestions located the Environmental Protection Agency's water Web site; the *Indoor AirPlus* Web site; the Healthy Indoor Environment *Protocols for Home Energy Upgrades* Web site; and *ENERGY STAR* Web site: www.epa.gov/greenbuilding.

Sustainable Communities

The City of Springfield is committed to rebuilding that is sustainable, and takes into account the six Livability Principles identified by the Partnership for Sustainable Communities:

- Provide more transportation choices.
- Promote equitable, affordable housing.
- Enhance economic competitiveness.
- Support existing communities.
- Coordinate and leverage federal policies and investment.

- Value communities and neighborhoods.

Springfield’s Disaster Recovery plan addresses these principles in the following ways:

Transportation Choices. Street improvements will include bike lanes and enhanced sidewalks.

Equitable affordable housing. The City has committed to work with its partners to replace affordable housing lost in the tornado. As planning moves forward, the City is ensuring that the planned housing will be high-quality and integrated into the community.

Economic competitiveness. The City’s rebuilding efforts in both the South End and Six Corners seek to improve the economic competitiveness of these neighborhoods.

Support existing communities. The activities that the City has selected to fund with the CDBG-DR program are those activities identified by the impacted communities through the Rebuild Springfield planning process. They are activities that support and enhance the neighborhoods, adding quality amenities.

Coordinated and leveraged policies and investment. This Rebuild Springfield plan sets forth a coordinated master plan for the tornado-impacted neighborhoods, which enables the desired improvements to be the driving force, not the funding priorities of a particular source of funding. The City is now working, along with private partners, to coordinate multiple programs and funding sources to carry out the vision that the community has defined. Carrying out this vision is not possible without coordinated and leveraged policies and investment.

Anti-Displacement and Relocation

Springfield plans to minimize displacement of persons or entities and assist persons or entities displaced as a result of implementing a project with CDBG-DR funds.

If any residents or businesses are displaced, Springfield will ensure that the assistance and protections afforded to persons or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), and Section 104(d) of the Housing and Community Development Act of 1974 are available.

SECTION 7: PROGRAM ADMINISTRATION

Capacity

The City of Springfield will oversee all activities and expenditures of the CDBG-DR Grant. The City will hire additional staff to support an increased volume of funding and projects resulting from the CDBG-DR award. These individuals will be trained by internal staff and consultants to execute project deliverables and ensure program compliance. New staffing may include, but is not limited to, a Senior Project Manager, a Compliance Officer, a Financial Analyst, and a Program Manager. Staffing will be added, as needed, based on project complexity and size, then integrated into the OCD Organizational Structure under direct lines of authority to Senior Staff members. Senior Staff includes the Deputy Director of Economic Development, the Deputy Director of Planning, the Director of Housing, and the Director of Administration and Finance.

Technical assistance will be provided by experienced consultants to City of Springfield personnel thereby increasing the capacity of the City of Springfield to implement and monitor CDBG-DR funded projects on a day to day basis. The City of Springfield will also maintain a close relationship with its HUD representatives and consult them throughout the disaster program when guidance is required.

Pre-Agreement Costs

The only pre-Agreement costs that will be charged to the CDBG-DR grant are staff costs incurred in connection with production of this CDBG-DR Action Plan.

Prevention of Duplication of Benefits

Duplication of benefits is prohibited in accordance with the HUD Federal Register 5582-N-01 and the Stafford Act. CDBG-DR funds will not be used for activities for which funds have been received (or will be received) from FEMA, National Flood Insurance Program, private insurers, the U. S. Army Corps of Engineers, SBA and other agencies. CDBG-DR funds may be used to provide assistance to the extent that a disaster recovery need has not been met by other sources.

Applicants for assistance will be required to disclose all sources of assistance applied for, received or to be received. All applicants will sign an application and a contract verifying all sources and an agreement to pay back any or all of the CDBG-DR assistance if additional funding is made available to them during the term of the contract or after the contract expires.

The City will negotiate data sharing agreements with FEMA, SBA, and the state Insurance Division to verify other benefits received by program applicants.

Steps To Avoid Occurrence of Fraud, Abuse and Mismanagement

M.G.L. chapter 468 requires the City to have a Director of Internal Audit. The Office of Internal Audit conducts financial and performance reviews to prevent and detect waste, fraud and

abuse and to improve the efficiency, effectiveness, and quality of public services provided in and by the City of Springfield.

The City's Office of the Internal Audit has a fraud hotline that can be used to report information about fraud, waste, or abuse of resources related to the City of Springfield. Anyone with information regarding known or suspected misappropriation of municipal funds or resources is encouraged to report the information to the City's Office of Internal Audit. Concerns and findings may be submitted in one of three ways:

- Complete a Fraud Information Report online; <http://www.springfield-ma.gov/finance/fraud-hotline.html> ;
- Leave a recorded voicemail message on the fraud hotline at (413)886-5125. This hotline is available 24 hours a day, 7 days a week; or
- Send a written report via U.S. mail to the following address: Office of Internal Auditor, 95 State Street, 6th Floor, Springfield, MA 01103.

The City of Springfield has a blanket crime policy for all employees who handle cash. The Treasurer, Assistant Treasurer, and the Assistant City Collector are also bonded as required by Massachusetts General Law.

Program Income

Program Income are earnings realized from Entitlement support activities and may include such items as loan repayments, rent received, proceeds from sale of property, and lien repayments. No subrecipient will be allowed to retain program income; all program income must be promptly returned to the City.

Springfield complies with HUD requirements found in 24 CFR § 570.489. In the event the City's activities generate program income, those funds, to the maximum extent feasible, are distributed before the City makes additional withdrawals from the Treasury.

All subrecipients funded through the CDBG-DR grant who generate program income must comply with all the HUD requirements. All program income derived from activities funded under CDBG-DR and all program income generated after the expiration of any contract/agreement shall be turned over to the City of Springfield within 10 days of receipt by the subrecipient as stated in the contract. No program income will be retained by a subrecipient.

All program income payments are recorded in a Program Income Report file, maintained by Community Development's Operations Manager, and balanced against MUNIS monthly. Program Income is also recorded in the appropriate database (DRGR) on a monthly basis and used before any entitlement funds are drawn. The internal Program Income Report, MUNIS

and DRGR are balanced monthly by the financial analyst to insure accurate and timely reporting of program income.

The OCD currently services all CDBG assisted loans. All loans have written contract that clearly describe the repayment terms, what constitutes a default, how it can be cleared, and what actions will be taken if the default is not cured. If applicable, detail of pledged security or collateral is also included in the contract. All loans, when applicable are recorded at the registry of deeds.

Upon receipt of a loan payment, a deposit voucher (settlement form) is prepared by the OCD Operations Manager for the transfer of funds to the City Treasurer for deposit and processing. Program income is recorded and the loan database is updated for the date of the current payment. The loan database is reviewed monthly for loan maturity dates and any other updates as required.

Monitoring Standards and Procedures

The OCD will maintain a high level of transparency and accountability by using a combination of risk analysis of programs and activities, desk reviews, site visits, and checklists modeled after HUD's Disaster Recovery Monitoring Checklists and existing monitoring checklists used in monitoring regular program activities. Any entity administering CDBG-DR funding will be subject to on-site monitoring not less than once during the contract period. Subrecipients can be selected for additional or in-depth monitoring according to various factors and criteria, for example, unsatisfactory performance standards during the program period, current external audit findings, program experience, project complexity, or special circumstances. The OCD Compliance Officer will review and recommend such actions as are necessary.

Monitoring will be carried out primarily by the Program Manager and the Financial Analyst. The Compliance Officer will oversee all monitoring activities. The Compliance Officer will report directly to the Senior Project Manager and the OCD Director of Administration and Finance on all monitoring issues. Senior Staff will review all monitoring and compliance reports.

Monitoring activities will consist of comprehensive and thorough procedures which will be documented through the project life cycle and will vary according to their need. The Program Manager and the Financial Analyst will conduct reviews, monitoring, and internal audits of subrecipients at the City of Springfield Disaster Recovery Office and onsite at the subrecipients' place of business.

A comprehensive system has been developed by OCD for subrecipients in order to insure compliance with program and budget requirements. This system will be used for the CDBG-DR

Grant. Per HUD's recommendation, OCD utilizes a coordinated project monitoring process, including coordinated fiscal and program on-site monitoring visits.

Main program files for CDBG-funded programs and projects are maintained within OCD's central file system, but the programs and projects are managed by program delivery staff within their respective departments. The OCD has primary responsibility for long-term compliance with program and comprehensive planning requirements. In addition, OCD staff oversees the fiscal monitoring of all activities funded through CDBG. OCD monitors CDBG contracts with organizations, and inter-departmental agreements with other City departments.

The CDBG-DR monitoring process will include these essential components:

INITIAL EVALUATION – An initial evaluation will be conducted for each subrecipient and sub-grantee. This initial evaluation will take place during project development and once a contract has been executed. The initial evaluation will consist of a survey and a number of questions designed to assess the risk factors and the need for additional monitoring.

PRE-MONITORING – Pre-monitoring will primarily consist of technical assistance and on-site reviews of subrecipient. The purpose of pre-monitoring is to more specifically review the policies and procedures of the subrecipients in meeting their compliance objectives. It will also determine the adequacy of the on-going monitoring efforts and program objectives.

PROGRESS REPORTS— All subrecipients are required to submit status reports to their Program Manager. Reports are reviewed by Program Manager to ensure that subrecipients are undertaking the activities contained within the Scope of Service and that they have achieved or are making diligent efforts to achieve the goals and objectives contained within the contract.

MONITORING SCHEDULE—OCD maintains a master contract schedule to track the dates and results of monitoring for all subrecipients and inter-departmental contracts. The schedule measures each contract against six risk factors.

RISK FACTOR 1: Subrecipient is new to the program

RISK FACTOR 2: Turnover of key staff

RISK FACTOR 3: Prior compliance or performance problems

RISK FACTOR 4: Subrecipient is carrying out a high risk activity (e.g. economic development)

RISK FACTOR 5: Multiple CDBG Contracts for the first time

RISK FACTOR 6: Reports not turned in on time

Any contract not included in the program monitoring schedule is subject to “bench monitoring.” This process involves contract scope review and review of monthly report forms and monthly narratives submitted by the subrecipient.

ON-SITE MONITORING—A notification letter is sent to the subrecipient confirming the date and the scope of the monitoring and a description of the information that will be required at the visit. At the visit, the monitor reviews project files to verify: (1) that the activities undertaken by the subrecipient are appropriate to satisfy the contractual obligations; (2) the accuracy of the information contained within the monthly progress reports; and (3) that the subrecipient is properly administering and implementing the program within federal guidelines. In addition, the monitor ensures that the subrecipient is achieving or making diligent efforts to achieve the goals and objectives stated in the contracts scope of service.

FOLLOW-UP—As a follow-up to a monitoring visit, the monitor sends a determination of compliance letter notifying the subrecipient of the monitoring results. The letter details the purpose of the visit, provides feedback, and addresses areas for improvement, if necessary. If the monitor identifies findings, a corrective action plan is required. If the monitor has any concerns, specific recommendations are provided to the subrecipient. The subrecipient is required to provide to OCD a written response describing how the subrecipient will resolve any findings and correct any deficiency identified in the letter. Upon receipt of a subrecipient’s response to identified findings or concerns, the monitor will determine if a follow-up site visit is necessary to ensure that (1) corrective action was taken; and (2) the agency is now complying and performing in accordance with its contract. If the Compliance Officer is not satisfied with the corrective action taken by the subrecipient, the findings are sent to the Director of Community Development and the OCD Director of Administration and Finance for further action.

CLOSE-OUT – This operation generally follows the close-out procedures as required by HUD and OCD. The Senior Project Manager and the Compliance Officer are responsible for closing out projects and reconciling program activities. This ensures that proper documentation and close-out procedures are met.

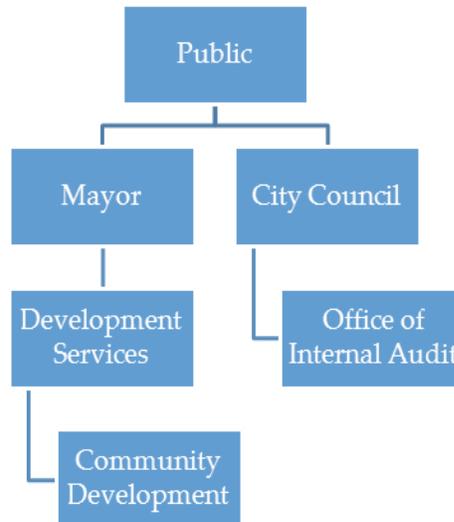
LONG TERM COMPLIANCE—Projects that have long-term compliance requirements are monitored annually to ensure compliance with funding terms.

ON-SITE COMPLIANCE MONITORING: During the Restriction Commitment Period required by the particular loan documents, the City undertakes regular on-site monitoring visits to ensure that self-reporting on income and rent certification is accurate, and to ensure that all program requirements and policies are in compliance with federal requirements.

Internal Audit

The City of Springfield and contract awardees are subject to the Single Audit Act. A Single Audit encompasses the review of compliance with program requirements and the proper expenditure of funds by an independent Certified Public Accountant. All findings and associated evidence will be reported directly from the independent Certified Public Accountant to the Office of Internal Audit and the Mayor. If necessary, a corrective Action Plan is then completed by the City of Springfield and submitted to the independent Certified Public Accountant to accompany the Audit file of that year.

As the organizational chart on the next page illustrates, the City's auditing function is independent from financial and program functions.



SECTION 8: CITIZEN ENGAGEMENT AND PARTICIPATION

Citizen Participation and Availability of Plan

Citizen participation is an essential component of the City's planning effort. The City strongly encourages public participation to identify and prioritize community needs. The City's process for obtaining input for and comment on this initial Partial Action Plan A is detailed in Section 1.

The City maintains an ongoing Recovery website that provides citizens with critical information on project scope, budget and delivery status. The Recovery website, www.springfield-ma.gov/planning/cdbg-dr.html, will provide access to CDBG-DR plans, procedures and project reports. It is a separate page on the City of Springfield web site dedicated to Recovery activity and will be updated at least quarterly.

Limited English Proficiency and Access for Persons with Disabilities

The City is committed to providing access to the Action Plan programs for all its residents. These efforts include special consideration for those with limited English proficiency (LEP) and persons with disabilities. The City performed the four-factor analysis prescribed in the Federal Register 72 FR 2732, and, as a result of the analysis, has determined that it will provide the draft Partial Action Plan, final Partial Action Plan, and any ensuing substantial amendments in both English and Spanish. Key participant documents such as application forms will also be available in both English and Spanish. No language group other than Spanish exceeds 5% of the population citywide.

To ensure meaningful access to vital documents for participant information, the City will respond to identified language needs in making translation available as requested and reasonable in other languages.

The City has made the Action Plan available on the City website as a fully-searchable PDF in order to make it accessible to persons with visual impairments. Individuals with disabilities may request auxiliary aids and services necessary for participation by contacting (TTY/TDD) (413)787-6641. Program application procedures will also follow prescribed guidelines to ensure access for individuals with disabilities. As requested, application and other key materials will be translated into Braille and other formats for persons with visual impairment.

Amendments to Action Plan

The following events would require a substantial amendment to the Action Plan:

- Change in program benefit, beneficiary, or eligibility criteria;
- A new allocation or re-allocation of more than \$1,000,000; or
- The addition or deletion of an activity.

A substantial amendment to the Springfield DR Action Plan will follow the same requirements as the publication of the original action plan in accordance to the Citizen Participation Plan.

These requirements include:

- Publication of the Substantial Amendment in English and Spanish on the City’s website;
- A comment period of at least 7 days;
- Submission of comments as follows:
 - Electronically on the City’s CDBG-DR website at www.springfield-ma.gov/planning/cdbg-dr;
 - Written comments mailed to: Office of Community Development, 1600 East Columbus Ave., Springfield, MA 01103
 - By telephone by contacting 311, the City of Springfield’s main source of government information and non-emergency services.
- City review of all comments received, with City response incorporated into the final document; and
- Publication of the Final Substantial Amendment in English and Spanish on the City’s website.

The City shall notify HUD of any non-substantial amendments, and post these amendments on the website. Every amendment, substantial or not, shall be numbered sequentially.

Complaints

Citizens with complaints about CDBG-DR funding or programs may submit complaints to:

Office of Community Development
1600 East Columbus Avenue
Springfield, MA 01103

The City shall provide a written response to every complaint relative to the CDBG-DR grant within fifteen (15) working days of receipt if practicable.

APPENDIX: PUBLIC COMMENTS

Comments Received During the Planning Period

Housing Public Hearing, July 17, 2013, JC Williams Center

Comment 1: There is an obvious disparity between the recovery in the Old Hill and Six Corners neighborhoods as compared with the rest of the City, and this disparity is troubling, given that the Old Hill and Six Corners neighborhoods are low-income and minority neighborhoods. There is a concern that Hill Homes tenants have been ignored, and that they are being forced to move.

Response: The City believes that the uneven recovery is due to private individuals spending insurance money toward rebuilding in some areas, where, in other areas, there was less insurance or owners are taking insurance money but abandoning damaged property. The City is responding to this uneven recovery by prioritizing the Old Hill and Six Corners neighborhoods for CDBG-DR funding. Hill Homes Cooperative Housing is a Rental Cooperative, which is governed by a Board of Directors elected by its members. The City communicates with the Hill Homes Cooperative through its Board of Directors and management company, and has set aside CDBG-DR funds to assist with this complex's recovery.

Comment #2: The City needs to emphasize rebuilding of Old Hill and Six Corners. These neighborhoods need a homeowners association or resident organization. The rebuilding of Springfield should include employment opportunities for young men in Springfield; in particular, there is a need for apprenticeship programs in construction trades.

Response: The City has prioritized Old Hill and Six Corners for rebuilding, and has committed the largest amount of CDBG-DR to these neighborhoods. The neighborhoods already have active Neighborhood Councils, and there is an ongoing community-building effort taking place in connection with these neighborhoods councils; the City believes that creation of any alternate community groups in these neighborhoods would dilute these important institutions and efforts. The City is using a portion of CDBG-DR funds for job training programs.

Comment #3: The City of New Haven is a model for use of apprenticeship programs to provide job opportunities and skills to local unemployed residents.

Response: While the City has committed funding for job training programs, the City does not design and operate these programs. The City encourages entities to develop job training programs that follow existing best practices and apply to the City for CDBG-DR funds to

operate these programs. The City also notes that it has a Section 3 Coordinator, whose role is to connect low-income local residents to HUD-funded employment opportunities.

Comment #4: The Maple High Six Corners Neighborhood Council has created a vision plan for redevelopment of the Six Corners neighborhood. Housing strategies in the plan are: 1) Creation of single-family housing on Central Street; 2) Single-family housing infill on vacant parcels throughout the neighborhood; 3) Redevelopment of the former Brookings School into housing and community development uses, especially for market rate lofts or senior housing; and 4) Demolition of blighted structures throughout the neighborhood.

Response: The City has committed CDBG-DR funds to the first, second, and fourth housing strategies recommended by the Neighborhood Council. The redevelopment of Brookings School will need to be responsive to market demand. The City intends to use a Request for Proposals to dispose of this property to an entity with an acceptable redevelopment plan; the City will include the Neighborhood Council in review of proposal responses, so that residents can provide input on the most appropriate and beneficial use for the site.

Comment #5: This commenter supports the use of CDBG-DR for funding of housing, particularly new construction of homes on vacant land and redevelopment of Hill Homes. Funds must also be made available for housing rehabilitation. The City should use CDBG-DR funds to leverage other funds.

Response: The City has included a commitment of funds for housing rehabilitation. It is a key City goal to use CDBG-DR funds as leverage for other funds.

Comment #6: It is important to build for sustainability—quality, long-lasting and durable construction methods and materials. Funds should not be used for demolition, but should be used, instead, for rehabilitation.

Response: Springfield has adopted the 2009 International Residential Code, which provides for quality, durable, energy efficient and mold resistant construction, and all construction projects must comply with the Code. The City supports both housing rehabilitation and demolition; in circumstances where rehabilitation costs are exorbitant or buildings are no longer structurally sound, the City's position is that it is more cost-effective to demolish rather than to rehabilitate. The City undertakes an analysis of cost-effectiveness, which incorporates consideration of the importance of preservation, into each decision weighing rehabilitation against demolition.

Comment #7: A Hill Homes resident indicated her belief that what has happened at Hill Homes (the delay in rehabilitation) is a disgrace. She believes the following components need to be part of the rebuilding of Hill Homes Cooperative: 1) the ownership organization must remain a

cooperative; and 2) while there is a preference to rebuild on the current site, she says that residents can compromise for a different appropriate site. The resident stated that not all money should go toward homeownership, that rental housing is also important.

Response: The City intends to make available CDBG-DR to assist with the rebuilding of Hill Homes Cooperative Housing. The owners of Hill Homes Cooperative (the tenant cooperative) currently have the power to make all decisions regarding redevelopment. The Board has informed the City that it has reached agreement to build new on the Hickory St. site that was formerly the location of Spring Hill Apartments.

Comment #8: This commenter spoke on behalf of her mother, who had lived at Hill Homes and relocated after the tornado. Her mother has reservations about her current neighborhood, and would like to move back.

Response: The former Hill Homes resident should contact the management of Hill Homes regarding opportunities to move back to the complex regarding the possibility of returning to a vacant unit or after rebuilding has taken place.

Comment #9: The commenter has children at Brookings Elementary School, and noted that they have suffered PTSD because of the experience of living through the tornado and school evacuation. She indicates the need for more support of children at Brookings School because of what they have been through. In addition, while there is an emphasis on homeownership, there is also a need for rental housing, and also for information on how to be a good renter.

Response: This plan is for physical improvements, and does not include social service needs; however, the City has noted the concern about the children of Brookings School, and will consider these needs in seeking additional funds to address outstanding needs. The City is supporting both homeownership and affordable rental housing in this plan.

Comment #10: The Six Corners neighborhood has so many vacant lots; it is in need of new development. In building new homes, the City should ensure that a variety of housing types are used, so that it looks like an old neighborhood, and not like a development. The One-Stop Plaza needs to be redeveloped, and the Watershops Pond area needs a gymnasium, a grocery store, and a Dunkin' Donuts.

Response: The City has committed to fund development of single family homes in the Six Corners neighborhood. Building styles will be determined by applicant developers, but the City will invite neighborhood residents to be part of the application review committee and provide input on appropriate housing styles. The City has committed CDBG-DR funds to Urban Renewal activities in the tornado-damaged neighborhoods, and will consider residents' input in carrying out these activities.

Comment #11: It is important that the money goes to the neighborhoods that are most in need, and not just disappear with no results.

Response: The City has determined that the Old Hill and Six Corners neighborhoods are most in need, and it is prioritizing these neighborhoods for CDBG-DR funds. The City will post CDBG-DR progress reports on the City's Disaster web page, so that residents will be able to monitor spending and projects outcomes.

Comment #12: A resident expressed her frustration in getting assistance in repairing her home from tornado damage, and still has repairs that need to be made.

Response: The City has committed funds to housing repair and will encourage all residents who still have repair needs to apply for funds.

Comment #13: A commenter who lives in the neighborhood and works at HAP Housing indicated her belief that it is important for the community to come together to improve their neighborhood and seek necessary change and assistance from the City. She suggested that residents at the meeting exchange contact information and work together.

Response: The City welcomes the opportunity to work with resident groups in planning for neighborhood improvements.

Economic Revitalization Public Hearing, July 11, 2013, Italian Cultural Center

Comment #1: The neighborhood would like to see the One Stop/Watershops areas used for redevelopment for mixed uses. They would like it to have retail, office space, medical space, restaurants, a gym, bookstore and a possible grocery store. The shopping plaza would support the new Brookings School and the new Hill Homes that will be rebuilt, and homes that will be rebuilt on Central Street. This would have an enormous impact and bring economic development together.

Response: The City has incorporated funding for urban renewal in order to explore possibilities for urban redevelopment, particularly in District 2.

Comment #2: A commenter asked how the funds are being determined? How is it determined if there is a gap?

Response: In determining the gaps, the City has estimated costs of recovery in the areas of housing, businesses, and infrastructure, and has subtracted amounts of FEMA assistance, insurance proceeds, and Small Business Association loans. After examining the data, reviewing the Rebuild Springfield plan, and obtaining public input, the City has created a budget for the CDBG-DR funds, which is set forth in this partial Action Plan.

Infrastructure Public Hearing, July 10, 2013, JC Williams Center

Comment #1: A commenter asked if the projects will be listed in the action plan and what areas they are in.

Response: The Action Plan includes information about projects that will be completed in each neighborhood.

Comment #2: There are concerns about area such as the South End with the casino coming to Springfield and the rebuilding of the South End Community Center.

Response: The City plans to use FEMA funds for redevelopment of the South End Community Center, so funding for this project is not included in the CDBG-DR Action Plan.

Comment #3: The Pine Point Library is without air-conditioning and the neighborhood would like the funds to be used to provide air-conditioning to this building.

Response: The City has decided to use the CDBG-DR funds in the tornado-impacted areas, and Pine Point is not in the tornado zone.

Comment #4: One commenter raised concerns about the roundabout in Six Corners and indicated that adding traffic on Central Street would be distracting. The commenter believes that the funds should focus on South Main Street where most of the damage was done.

Response: The City has focused some attention on the Six Corners intersection because it has been identified as a dangerous intersection, with many accidents, and it is in the heavily damaged District 2 tornado area. The City does not expect to add traffic to Central Street, but improve traffic flow through the area. As noted in the plan, the City has funded extensive infrastructure improvements in the South End since 2008, and these improvements have survived the disaster; in addition, the City is investing millions of dollars in housing funds in the South End through the HOME and Neighborhood Stabilization Programs. The City expects that most or all of the funds it is committing for businesses will go to small businesses in the South End, particularly on South Main Street.

Comment #5: The Six Corners/Old Hill Neighborhood noted that they have been working on a development plan for the neighborhood, which includes improvements to Hickory Street and Central Street to eliminate the poorly-planned intersections; illumination of Rifle Street and Central Streets; and a bike path that will continue to Johnny Appleseed Park with Phase II of the bikeway path to continue towards Springfield College. The Committee spoke on the neighborhood being ignored, streets need improvements. They noted the needs of Mill and Pine Streets, and the need to maintain gateway areas, plantings, flower beds. Ruth Elizabeth Park should be revitalized.

Response: This plan will fund the intersection improvements, and street improvements. The City plans to revitalize Ruth Elizabeth Park with another source of funds once the new Brookings School is completed and the modular units are removed from the park. The City will consider the other recommendations for future funding opportunities.

Comment #6: One commenter asked about local hiring on construction projects in the City.

Response: For construction projects carried out by the City, there is a requirement to hire Springfield residents; projects are monitored and have strict requirements. For projects that are funded with HUD funding and carried out by subrecipients, the requirements of Section 3 apply, which creates preferences for local low-income employees and businesses that hire them. The City has a Section 3 Coordinator to assist grant sub-recipients in identifying these employees and businesses, and to monitoring the HUD hiring preferences.

Comment #7: The Six Corners/Old Hill neighborhoods areas are now 18% is homeownership. It would be beneficial to rebuild Central Street housing and bring new life to the commercial area at Central and Hickory Streets.

Response: The City will use CDBG-DR funds to build new single-family housing on and around Central Street, and it has committed funds to explore urban renewal in the District 2 neighborhoods.

Comment #8: The City should spend the money on the homeless.

Response: The City has many programs that support the needs of the homeless. Its analysis of the data indicates that there are large unmet needs resulting from the June 2011 tornado, but that the needs of the homeless population were not dramatically impacted by the tornado. City staff believes that rebuilding lost public and subsidized housing units, including units that provide permanent supportive housing for persons with mental illness, is an important component of meeting the needs of the City's homeless population.

Written Comments

The City received a number of written comments that detailed the specific costs and unmet needs of individual homeowners and businesses. The City used this information to provide background data for calculation of unmet needs as set forth in this Partial Action Plan, but is not summarizing these letters in this public document. More general comments are summarized below.

Comment #1: There are extensive damages to roads and sidewalks which need to be repaired.

Response: The City is using a portion of its CDBG-DR allocation for street repaving and sidewalk construction.

Comment #2: Roosevelt Avenue, especially around Cathedral High School, was heavily damaged.

Response: Because the City expects major construction to take place in that area as Cathedral High School is rebuilt, the City does not expect to use CDBG-DR funds to repair this area at this time. The City will consider other funding sources to address these needs after the rebuilding is complete.

Comments #3 and 4: The Springfield Historical Commission and The Springfield Preservation Trust provided written comments indicating the importance of preserving and restoring the following buildings: 1) historic buildings on the MacDuffie campus (particularly the Wallace House and Ames House); 2) buildings in the Maple High Historic District, particularly 210 Maple Street; 3) the Howard Street Armory (if MGM does not restore the building); 4) the former Elias Brookings School; 5) the front part of the Zanetti School (if the MGM plan does not come to fruition); 6) and historic residential structures in the Six Corners neighborhood. Both comments indicate that demolition of historic properties should be avoided. In addition, both the Commission and the Trust request that a Historic Property Survey be performed in the Six Corners neighborhood.

Response: The City recognizes the importance of preservation of historic structures, but also the need to balance the steep cost of preservation/restoration of each severely damaged structure against the need to support recovery throughout the tornado zone. The City's information is that the insurance claim for the MacDuffie buildings has only recently been settled, and it is not known at this time if the campus will have unmet needs; therefore, the City is not committing CDBG-DR funds to this project at this time, but may consider the property for future funding sources. The City is unaware of the status of 210 Maple Street, but if this is an owner-occupied property, the owner may apply to the City for rehabilitation funds. Due to spending deadlines for CDBG-DR funds and the uncertainty of MGM plans, the City is not committing funds at this time for the Armory or Zanetti School. The City has already used FEMA funds to restore the roof at the former Brookings School and stabilize the building, and will use the Request for Proposals process to find an appropriate use for this property. Regarding properties in Six Corners: a number of properties in this neighborhood were severely damaged and were also abandoned; by the time the City was able to get control of the structures (through tax title or court orders), they were too damaged to be able to repair. The City is making funds available for repair of homes in this neighborhood where there are still unmet needs for restoration.

Comment #5: Western Mass COSH and the Uptown Construction Collaborative submitted a proposal to create a construction training project to restore tornado-damaged houses.

Response: The City has committed funds for job training, which will be distributed using a Request for Proposals process. These organizations are invited to apply for these funds to carry out this proposal.

Comment #6: This commenter emphasizes the following ideas that were part of the Rebuild Springfield planning process: development of a vibrant and inclusive South End Community Center; and improved access to the riverfront. The commenter also suggests use of funds to support the social service needs of youth.

Response: The City is committed to development of a vibrant and inclusive South End Community Center, and plans to use FEMA funds for this purpose. The MGM casino plan includes improvements regarding riverfront access, so the City will not fund this activity at this time. The City has not elected to use these one-time CDBG-DR funds to provide social services, because there are no identified funding sources for ongoing support of these services.

Comment #7: The Maple High Six Corners Neighborhood Council submitted its Watershops District Action Plan, which is the result of two years of study and surveys in response to the June 2011 tornado, and was compiled by the Vision Coalition of the Maple High Six Corners Neighborhood Council, the Pioneer Valley Planning Commission, and HAP Housing. The plan identifies the following housing, business and infrastructure projects as high-priority: single-family residential infill on Central Street; new homes on vacant lots throughout the neighborhood; redevelopment of the Old Brookings School; realignment of Central/Hickory Street and streetscape improvements; redevelopment of the One-Stop Block and Watershops Armory; development of a Mill River Greenway Bike Path; redesign the Six Corners intersection.

Response: The City has programmed CDBG-DR funds to address each of these high-priority needs except the Mill River Greenway Bike Path; the City anticipates seeking future funds to address this project.

Comment #8: Universal community Voices Eliminating Disparities/Springfield Health Disparities Project submitted a Petition signed by 16 individuals. The Petition requests an end to “efforts to dispossess the resident owners of Hill Homes of their property and to impose racial and economic segregation” in Springfield.

Response: The City is making available CDBG-DR funds to assist Hill Homes Cooperative Housing to rebuild. The City does not own the property. The Board of Directors makes decisions about the outcome of the property.

Comment #9: The Community Labor Rebuilding Coalition, Universal Community Voice Eliminating Disparities, and Open Housing Development of Western Mass submitted a

document entitled: “A Plan for Community Improvement Based on Rebuilding Hill Homes, Enhancement of Springfield College, Revival of the Lakeside Homeowners Association, Inc. and implementation of Affirmative Marketing via a Local ‘Housing Center.’” The document calls for the following: 1) Rechartering of the Lakeside Homeowners Association; 2) Development of New and Renovated Housing in the Lakeside Area; 3) Affirmative Marketing of the Area to All People; and 4) Coordinated Business Development and Retail Area Management. The document also provides specific recommendations about redevelopment of Hill Homes Cooperative Apartments and Six Corners redevelopment.

Response: The City considers the Rebuild Springfield plan a comprehensive plan for this neighborhood, and notes that this plan was developed with input of over 3000 residents. Responses regarding the specific items listed in the document follow. 1) The City does not have a role in creation of a homeowners’ association. 2) The City plans to use CDBG-DR funds to support development of new homeownership units in District 2, and the units will be made available to purchasers with incomes of up to 120% area median income, which makes the homes equivalent to market-rate units. 3) The City requires Affirmative Marketing to the persons least likely to access the housing for every housing project it funds. 4) The submitted plan calls for this activity to be carried out by the proposed Homeowners Association, an entity that the City would not create or control, so the City has no response to this comment.

Comments on Draft Action Plan

The City received several comments on the Draft Partial Action Plan. The comments are summarized below, with City responses to each comment.

Comment #1: An owner of rental property asked about assistance to investor-owners of residential property in the tornado zone who continue to have unmet needs.

Response: The City has made the decision not to make assistance available to investor-owners (with the exception of where necessary for replacement of public and subsidized units destroyed by the tornado.) Provision of rehabilitation funds to investor-owners requires the imposition of affordability restrictions on the property, and, given that the damaged investor-owned properties are located in very low-income neighborhoods, such restrictions would serve to support further concentration of poverty in neighborhoods that already contain concentrated poverty.

Comment #2: A large non-profit business that sustained extensive property loss expressed concern that the Action Plan does not include any programs that can assist them to recover.

Response: The city will consider additional funding programs for businesses and non-profits in future CDBG-DR Action Plans and will examine existing programs including the Section 108

loan program to assist in gap financing for larger scale, job creating projects that may not meet the requirements of a small business lending program.

Comment #3: The Maple High Six Corners Neighborhood Council indicated that there is a need for planning funding as a first step toward introduction of a Full Service Community School (FSCS) model at the Elias Brookings Elementary School.

Response: Springfield Public Schools funds the City Connects Program (a research-based support program) and a social worker at the Brookings School, and struggles to sustain these programs.

Comment #4: The Maple High Six Corners Neighborhood Council indicated a lack of community support for a formal roundabout at the Six Corners intersection.

Response: The City has identified the Six Corners intersection as a priority because it is a high-volume, high-accident intersection. In this initial Partial Action Plan, the City is committing funds for planning and design to improve the intersection. The planning/design process will include the neighborhood, and will consider multiple solutions for consideration. The City has not reached any conclusions at this point about the best solutions for this intersection and values the community's response in making this determination.

Comment #5: One commenter asked if the Action Plan includes funds to finish Main Street in the North End.

Response: This Plan does not include funding for that project, because this Plan is only addressing needs in the tornado zone. However, the City has already obtained commitments from other funding sources to complete the North End Main Street project. The remaining portion of the project is in the final design stage, and all construction will be completed in the next two years.

Comment #6: A small business owner sent in information about her unmet business needs.

Response: The City has incorporated this owner's information into its analysis, and the owner will be able to apply for assistance once the City initiates the Business Recovery Loan Program, a project to be funded under this Partial Action Plan.

CITY OF SPRINGFIELD
COMMUNITY PLANNING MEETINGS
FOR \$21.8 MILLION DISASTER RELIEF FUNDS
(CDBG-DR)

The City of Springfield has been awarded **Community Development Block Grant Disaster Relief funds (CDBG-DR)** that will be used for disaster related relief, long-term recovery, restoration of infrastructure and housing and economic revitalization activities in the most impacted distressed areas of the City of Springfield resulting from multiple Presidentially Declared Disasters occurring in 2011 or 2012. In July 2013, we are creating the plan for spending of these funds.

We are looking for your input!

You are invited to attend and give input at one or all of the following meetings:

Infrastructure (Roads, Sidewalks, Public Buildings, Schools, Parks)

Location: JC Williams Community Center, 116 Florence Street

Date: Wednesday, July 10, 2013

Time: 5:30 PM

Economic Revitalization (Job Training, Small Business Assistance)

Location: Italian Cultural Center, 56 Margaret Street

Date: Thursday, July 11, 2013

Time: 5:00 PM

Housing Development and Revitalization of Neighborhoods

Location: JC Williams Community Center, 116 Florence Street

Date: Wednesday, July 17, 2013

Time: 5:30 PM

Interested parties are also invited to submit written comments to

cbuono@springfieldcityhall.com . The deadline for comments is by 4:00 PM

July 19, 2013. All information and answers to questions/comments will be posted on the City of Springfield's website (www.springfieldcityhall.com).

If you need additional information or accommodations, please contact the Office of Community Development at 750-2241 or TTY 787-6641.

CIUDAD DE SPRINGFIELD

Reuniones de planificación COMUNIDAD

DE \$ 21.8 MILLONES DE DESASTRES fondos de ayuda (CDBG-DR)

La ciudad de Springfield ha sido galardonado con los fondos de **Subsidios Globales para el Desarrollo Comunitario (CDBG Disaster Relief-DR)** que serán utilizados para el alivio de desastres relacionados con, la recuperación a largo plazo, la restauración de la infraestructura y la vivienda y las actividades de revitalización económica en las áreas más afectadas en dificultades de la Ciudad de Springfield resultante de múltiples desastres declarado por el Presidente se produce en 2011 o 2012. En julio de 2013, estamos creando el plan de gasto de estos fondos.

Estamos en busca de su ayuda!

Usted está invitado a asistir y dar entrada a una o todas de las siguientes reuniones:

Infraestructura (carreteras, aceras, edificios públicos, escuelas, parques)

Lugar: Centro Comunitario JC Williams, 116 Florence Street

Fecha: Miércoles, 10 de julio 2013

Hora: 5:30 PM

Reactivación Económica (Capacitación Laboral, Asistencia de Pequeños Negocios)

Lugar: Centro Cultural Italiano, 56 Margaret Street

Fecha: Jueves, 11 de julio 2013

Hora: 5:00 PM

Desarrollo de Vivienda y Revitalización de Barrios

Lugar: Centro Comunitario JC Williams, 116 Florence Street

Fecha: Miércoles, 17 de julio 2013

Hora: 5:30 PM

También se invita a los interesados a presentar observaciones por escrito a cbuono@springfieldcityhall.com. La fecha límite de recepción de las 4:00 pm 19 de julio 2013. Toda la información y respuestas a sus preguntas/comentarios serán publicadas en el web de la Ciudad de Springfield (www.springfieldcityhall.com)

Si necesita información adicional o alojamientos, por favor comuníquese con la Oficina de Desarrollo Comunitario al 750-2241 o TTY 787-6641.

[Letter sent to agencies and businesses]

Agency

The City of Springfield has been awarded Community Development Block Grant Disaster Relief Funds (CDBG-DR). This funding will be used for disaster related relief, long-term recovery, restoration of infrastructure and housing and economic revitalization activities in the most impacted and distressed areas of the City of Springfield resulting from multiple Presidentially Declared Disasters occurring in 2011 or 2012.

The City is completing a needs assessment; so that we can understand the full amount of unmet repair/rebuilding need or economic loss in the community as we plan for the use of these funds. We are reaching out to agencies that were directly impacted by these disasters. We would like to hear directly from you as to your agency's losses, including the estimates and/or actual costs to repair and any insurance proceeds and any SBA or FEMA funding received for these losses.

Please send any information by July 15, 2013 to:

Cathy Buono
Office of Community Development
1600 East Columbus Ave
Springfield, MA 01103
cbuono@springfieldcityhall.com

Thank you for your assistance in this very important planning project. We look forward to hearing from you.