



The City of Springfield

COMMUNITY DEVELOPMENT BLOCK GRANT –
DISASTER RECOVERY
Partial Action Plan A

Mayor Domenic J. Sarno
August 2013

DRAFT FOR PUBLIC COMMENT

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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, most directly as a result of October 2012's Superstorm Sandy, 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, 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 a 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.

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.

This 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 owners of all HUD-subsidized housing impacted by the tornado to learn about their unmet recovery needs.

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).

Springfield, Massachusetts 311

HOME RESIDENTS BUSINESS LEISURE GOVERNMENT CALENDAR

Home / Community Development / CDBG Disaster Recovery (DR)

CDBG Disaster Recovery (DR)

The City of Springfield has been awarded \$21.8 Million **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.

Community Development
CDBG Disaster Recovery (DR)
 Prior Year Plans and Notices
 Neighborhood Councils

Community Development Office
 City Hall Room 313

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

Summary of Impact and Unmet Needs Assessment

HUD requires the City to complete an unmet needs assessment that quantifies the funding needed for recovery. The assessment is used to determine the extent of unmet needs and to help prioritize among those needs, with a focus on low and moderate income households and the most impacted neighborhoods. The assessment must evaluate three core recovery sectors: (1) housing; (2) the economy; and (3) infrastructure.

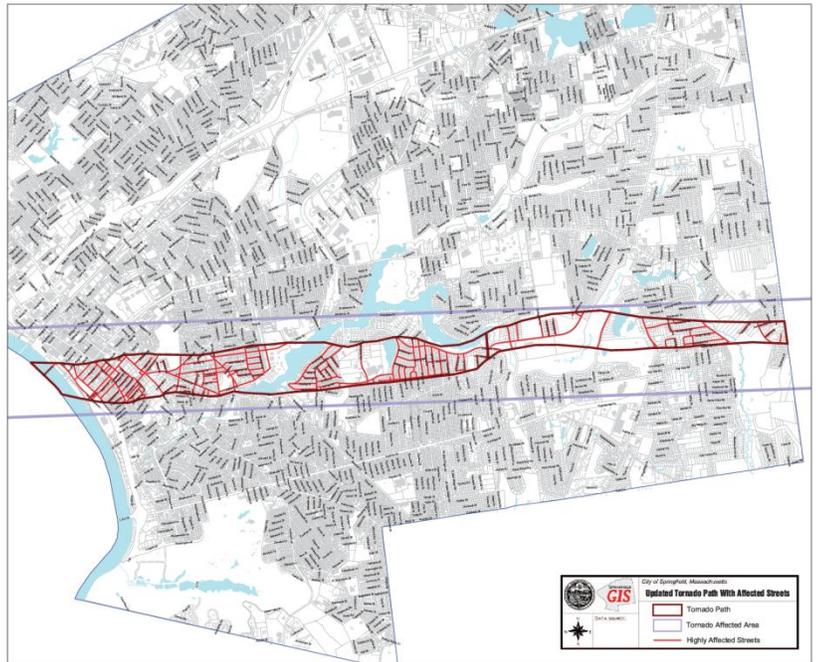
According to HUD, “unmet needs” are financial resources necessary to recover from a disaster that are not satisfied by other public or private funding sources like FEMA Individual Assistance, SBA Disaster Loans, or private insurance. Per HUD’s guidelines that an unmet needs analysis focus on the housing, economic and infrastructure sectors, the following table reflects Springfield’s unmet disaster needs in these three sectors.

Estimate of Unmet Needs			
	Need	Funds Disbursed/Eligible	Unmet Need
Housing	\$103,406,000	\$27,146,708	\$76,259,292
Businesses	\$40,781,633	\$20,614,503	\$20,167,130
Infrastructure/Community Facilities	\$154,553,665	\$83,976,103	\$70,577,562
TOTAL	\$298,741,298	\$131,737,314	\$167,003,948

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 \$167,003,948 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.

Impacted Neighborhoods

Per HUD guidance, Springfield has undertaken an analysis that summarizes damage to the 8 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. This analysis relies heavily on City of Springfield data regarding damaged properties and on summary reports provided by FEMA and SBA.

The June 2011 tornado caused 1% of the households in Springfield to incur damage to their homes of 30% or more, as estimated by FEMA. 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.

In the Rebuild Springfield Plan, the impacted neighborhoods were grouped into three districts, each of which has different characteristics and needs. This narrative summary uses the district framework to organize information about unmet need and demographic data of the impacted areas. A chart detailing the demographics and amount of damage in each impacted census tract follows the descriptive narrative.

District 1: Metro Center and South End

The Metro Center and South End neighborhoods have 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 161 housing units had damaged of 10% or more; of these units, 99 were 100% damaged. The building housing the South End Community Center was partially destroyed, and the Zanetti School building was 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%. Demographics of these neighborhoods are predominantly Latino neighborhoods

(about two-thirds), and about 20% African American residents. 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 pre-tornado neighborhood improvements were preserved through the tornado or have been repaired since the disaster.

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, 116 residential structures with 281 housing units sustained damage of 10% or more, of these, 119 were 100% damaged. This district sustained destruction and severe damage to 50 subsidized housing units and 12 public housing units. Elias Brookings Elementary School was also 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.



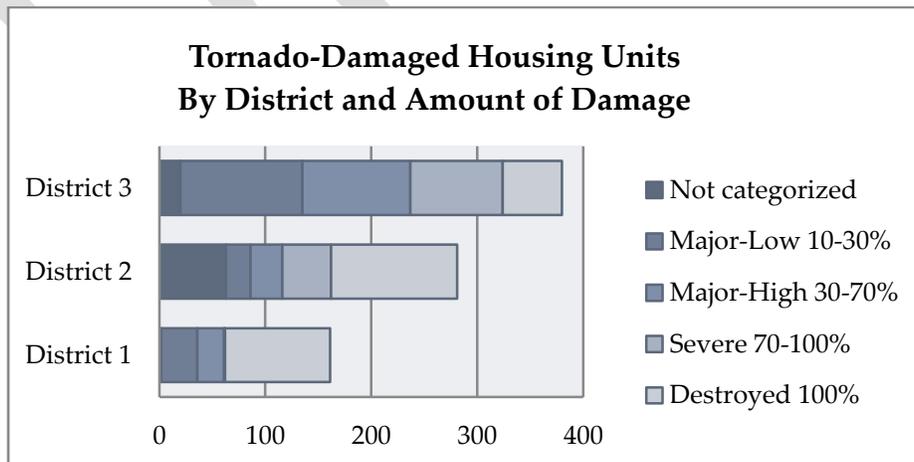
District 3: East Forest Park and Sixteen Acres

In the East Forest Park and Sixteen Acres neighborhoods, 397 single-family homes sustained damage of 10% or more; of these, 56 were damaged 100%. 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 with major damage, all but ___ 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 \$48,548, \$50,966, and \$58,275.

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%.



	City of Springfield	Sixteen Acres			Old Hill	Six Corners		South End	East Forest Park
Census Tract		8016.01	8016.02	8016.03	8018	8019.01	8019.02	8020	8024
% of City Households with >30% home damage	1%	11%			15%	22%		23%	29%
Households	56,211	1493	1833	1699	1257	1499	1508	1165	1517
% Black Households	20%	17%	21%	12%	44%	28%	14%	14%	9%
% Asian/Pacific Islander Households	2%	2%	0%	7%	0%	0%	0%	1%	2%
% Native American Households	0%	0%	0%	0%	0%	0%	0%	0%	0%
% White Households	38%	62%	61%	65%	13%	20%	19%	23%	79%
% Hispanic Households	37%	14%	17%	14%	40%	51%	63%	63%	8%
% Disabled Households		<i>US Census data does not provide this information by census tract for Springfield.</i>							
% Households over 65 living alone	11%	14%	11%	16%	12%	3%	11%	2%	14%
% Owner-Occupied Households	51%	82%	69%	84%	45%	15%	15%	9%	94%
% Renter Occupied Households	49%	18%	31%	16%	55%	85%	85%	91%	6%
Median Household Income	\$35,603	\$50,966	\$48,548	\$58,275	\$24,602	\$18,861	\$17,874	\$17,236	\$77,222
% 1-4 Family	76%	86%	83%	87%	83%	58%	31%	59%	100%
% Multifamily	24%	14%	17%	13%	17%	42%	69%	41%	0%

Housing

The June 2011 tornado significantly impacted Springfield's housing stock. Approximately 306 owners' primary residences and 384 renter-occupied units sustained "severe" or "major" physical damage. Stated differently, of residences that sustained severe or major damage as a result of the tornado, owner-occupied residences comprise 44% of the total and renter-occupied units comprise 56% of the total. Current data also indicate that 172 total residences sustained "minor" damage (126 owner-occupied properties and 46 rental units).

Impact on Homeowners

The June 2011 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. 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 several homeowners still in need.

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

Almost half of all housing damage occurred to rental stock, equivalent to 430 units, with 357 rental units condemned following 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. Renters who were displaced and had sufficient income to rent replacement housing were able to find new rental units quickly.

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.

Impact on Low and Moderate Income Populations

The tornado destroyed a total of 74 units of public and subsidized low-income housing. The owners of each of these properties were able to re-house displaced tenants in other units they owned, but the units need to be replaced. 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.

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

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 underway after the owner obtained tax credit equity and state and federal affordable housing funds.

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 were 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. 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. In addition, older adult populations may be at a greater risk of financial exploitation following a disaster.

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.

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, and private insurance 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.

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.

The City has undertaken a calculation based on the actual number of owner-occupant 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 \$33,630,000. For multi-family rental housing, the City has calculated replacement cost for demolished units at \$200,000 per unit. The full amount of damage to private

FEMA Data as of July 18, 2013

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

Calculation of Owner-Occupied Housing Repair/Replacement Cost

Amount of damage	Number of homes	Replacement/Repair cost	Total cost
100%	71	\$180,000	\$12,780,000
70-100%	99	\$90,000	\$8,910,000
30-70%	136	\$60,000	\$8,160,000
10-30%	126	\$30,000	\$3,780,000
TOTAL	432		\$33,630,000

Calculation of Rental Housing Repair/Replacement Cost

Amount of damage	Number of units	Replacement/Repair cost per unit	Total cost
100%	198	\$200,000	\$39,600,000
70-100%	36	\$100,000	\$3,600,000
30-70%	43	\$75,000	\$3,225,000
10-30%	36	\$30,000	\$1,080,000
TOTAL			\$47,505,000

rental property is estimated to be \$47,505,000.

The City has separately calculated the cost of destruction to the 74 units of public and subsidized housing that must be rebuilt, because the replacement cost for these units is so high. The estimated replacement costs for these units is \$300,000 per unit, for a total loss of \$22,200,000.

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.

SBA Summary Table as of July 15, 2013

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

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.

The total amount of housing damage, including owner-occupant, rental, and public and subsidized housing, is \$103,406,000. 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 \$76,259,292.

Economic Development

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.

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 nearly 100 businesses that sustained damage, and without doubt there were more that were affected that the City was unable to identify. Within Springfield, 387 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.

Sector	Number of Businesses
Manufacturing	3
Wholesale Trade	3
Retail Trade	14
Transportation and Warehousing	1
Finance and Insurance	6
Real Estate and Rental and Leasing	1
Professional, Scientific, and Technical Services	10
Educational Services	1
Health Care and Social Assistance	5
Arts, Entertainment, and Recreation	4
Accommodation and Food Services	5
Other Services	15

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.

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 data from the Small Business Association, 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.

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).

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.

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

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,

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 suffered an estimated \$40,781,633 in total commercial loss and interrupted business operations. In total, \$20,614,503 of recovery funds have 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.

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. 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 experiences 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 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.

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	\$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

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

The June 2011 tornado cut a swath of destruction through the City, starting with downtown areas, destroying urban core residential neighborhoods that have been experiencing distress, and finally exiting through stable middle-class residential neighborhoods. 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 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 a \$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 is 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.



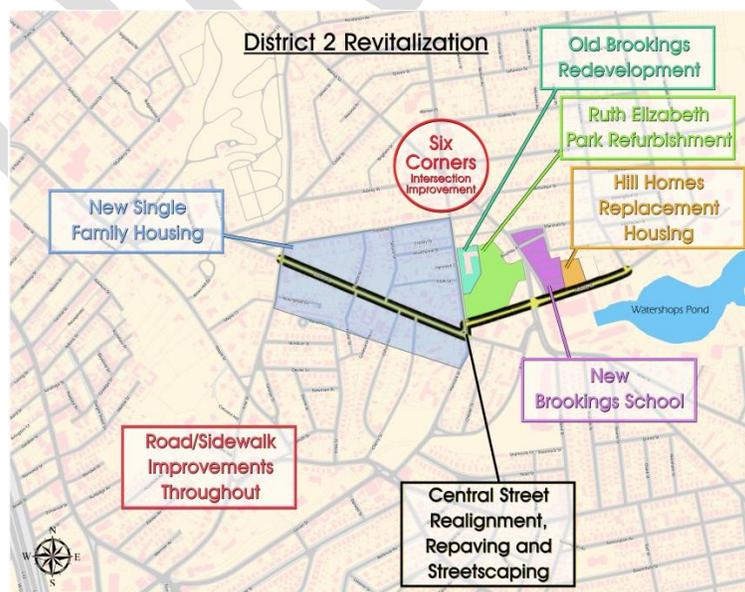
The following catalytic projects are planned for Six Corners and Old Hill:

- 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;
- 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
- Restoring public streetscapes and public spaces

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.

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 the organizations already active, or that will become active in the recovery.

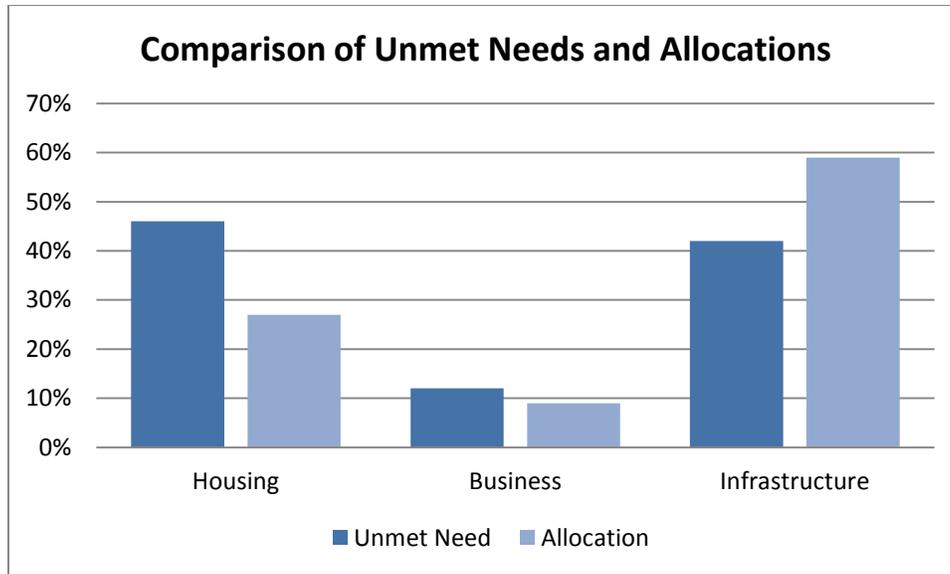
SECTION 4: DISTRIBUTION OF CDBG DR FUNDS

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.



The City’s allocation of resources does not directly correspond with the amounts of unmet need identified in the analysis in this document. 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 business. While the numbers reflect a small 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.

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.

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.

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

Eligibility: 24 C.F.R. § 570.204(c)

National Objective: Low/Moderate Income Housing, Urgent Need

Outcome: 7 single-family homes

Waiver Request: The City requests that it be permitted to use an RFP process to select private profit or non-profit developers for construction of these homes, and that categories of developers are not limited to Community Housing Development Organizations (CHDOs) or similar entities.

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.

Allocation for Activity: \$600,000

Eligibility: 24 C.F.R. § 570.201(d)

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

Outcome: Demolition of 12 structures

Activity 3: Housing Repair

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

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 nine most impacted and distressed counties
- Homeowner must have been registered with FEMA
- Homeowner must have a household income at or below 80% area median income

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

Eligibility: 24 C.F.R. § 570.202

National Objective: Low/Moderate Income Housing, Urgent Need

Outcome: 10 homes

Activity 4: Replacement of Multi-family Housing

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

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.

Eligibility: 24 C.F.R. § 570.208

National Objective: Low/Moderate Income Housing, Urgent Need

Outcome: 13 units

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.

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
- 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

Eligibility: 24 C.F.R. § 570.201 (e)

National Objective: Low/Moderate Income Limited Clientele, Urgent Need

Outcome: Job training for a minimum of 100 Springfield residents

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.

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
- Home-base businesses excluded

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

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

Activity 7: Urban Renewal

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

Allocation for Activity: \$500,000

Program Goals:

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

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

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

Outcome: Removal of slum or blight

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.

Allocation for Activity: \$5,070,000

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

Eligibility: 24 C.F.R. §570.201(c)

National Objective: Low/Moderate Income Area, Urgent Need

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

Activity 9: Parks

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

Allocation for Activity: \$536,000

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

Eligibility: 24 C.F.R. §570.201(c)

National Objective: Low/Moderate Income Area, Urgent Need

Outcome: 1 park

Activity 10: Schools

The City of Springfield, through its Finance Division, will purchase two intact and undamaged school buildings located in the tornado zone. These buildings will provide the Springfield School Department with flexibility regarding school space, an important need that was diminished with the loss of the large Zanetti School building.

Allocation for Activity: \$3,700,000

Criteria for Selection: Buildings have been selected by the City

Eligibility: 24 C.F.R. § 570.201(a)

National Objective: Low/Moderate Income Area Benefit

Outcome: 2 school buildings

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 below table 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 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.

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

SECTION 6: REBUILDING STANDARDS

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.

Green Building

Springfield will require replacement and new construction to meet green building standards by requiring compliance with ENERGY STAR™. Springfield will further encourage green building practices throughout all other proposed programs.

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 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

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

No subrecipient will be allowed to retain program income; all program income must be promptly returned to the City.

Springfield will comply 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, shall be distributed before the City makes additional withdrawals from the Treasury.

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 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 citizens. 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 Hew 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 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 believe 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

[To be added following close of public comment period.]