

# Massachusetts Disaster Recovery Action Plan



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# Change Log

Version (Date)	Summary of Changes Made
Version 1 (Original version submitted 12-30-25)	

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# Executive Summary

The State of Massachusetts is required to publish an Action Plan for Disaster Recovery that describes the proposed use of \$7,954,000 of U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant Disaster Recovery (CDBG-DR) funding associated with the Disaster Relief Supplemental Appropriations Act, 2025, Public Law 118-158. This funding supports recovery and mitigation efforts related to FEMA DR-4780-MA, a major disaster declared by the President dated May 15, 2024. A total of \$7,954,000 was allocated to Massachusetts in the Federal Register Notice published January 16, 2025.

The CDBG-DR funds are for necessary expenses for activities authorized under Title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 *et seq.*) (HCDA) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the “most impacted and distressed” (MID) areas resulting from a qualifying major disaster.

The CDBG-DR Action Plan is a key mechanism for EOHLC to inform the public and HUD of the intended use of the funds within their community and how this plan connects to the community’s remaining unmet needs and mitigation needs associated with the qualifying disaster(s).

To frame the review of the Action Plan, readers should be aware of the overall structure of the CDBG-DR Program. CDBG-DR exists only when Congress appropriates funding for such programs as Presidentially declared disasters under Title IV of the Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C.5121 *et seq.*). CDBG-DR is implemented through Federal Register Notices and, where appropriate, regulations for the annual CDBG program which can be found at 24 CFR 570 for the State Program.

The State has developed this Action Plan in accordance with the updated Universal Notice, as revised by Memorandum 2025-02, dated March 19, 2025, and Memorandum 2025-03, dated April 5, 2025. The updated Universal Notice made changes to the guidance and requirements, taking into account recently signed Executive Orders.

Since the foundation of the CDBG-DR program is based on the regulations of the CDBG Program, which is administered by the Community Development Unit within the Executive Office of Housing and Livable Communities (EOHLC), the CDBG-DR funding will also be administered by EOHLC.

## Overview:

The U.S. Department of Housing and Urban Development (HUD) announced that the Commonwealth of Massachusetts will receive \$7,954,000 in funding to support long-term recovery efforts following the Presidentially-declared major disaster DR-4780-MA – Massachusetts Severe Storms and Flooding, issued May 15, 2024, through the Allocation Announcement Notice published in the Federal Register at 90 FR 4759. This allocation was made available through the Disaster Relief Supplemental Appropriations Act, 2025, Public Law 118-158. To meet disaster recovery needs, the appropriations act(s) making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and facilitate a quicker recovery. Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be used to address remaining unmet need in the HUD-identified Most Impacted and Distressed (MID) area of Worcester County (ZIP code 01453).

## Disaster-Specific Overview

**The below summary contains excerpts from the Governor’s Sept. 11-13, 2023 Declaration Request and information from Leominster’s account of the event:**

The Commonwealth of Massachusetts experienced severe weather and flooding that directly affected the State from September 11-13, 2023. The extraordinarily heavy rain from a stalled front resulted in extensive flooding across the state, overwhelming federal, state, and local roads, and flooding thousands of homes and businesses. The event led to overtopped dams, culverts, and roadways; and the undermining (and disabling) of a commuter rail line. Response to the event required thousands of hours of municipal and state staff and volunteer time and included evacuations, sheltering, water rescues, and the construction of temporary roadways to allow access to homes and for response services.

As a direct result of the incident, roads throughout the state were undermined, and roadside shoulders, ditches, and adjacent slopes were washed away. State and local culverts, pipe headwalls and other drainage structures were overwhelmed with water and debris causing damage or destruction to drainage systems and surrounding areas and infrastructure. Severe flash flooding overwhelmed drainage systems and presented a travel hazard to the public, as well as obstacles for first responders in preserving public health and safety. Extensive damage to state, local, and private roads in these communities trapped residents in their homes and

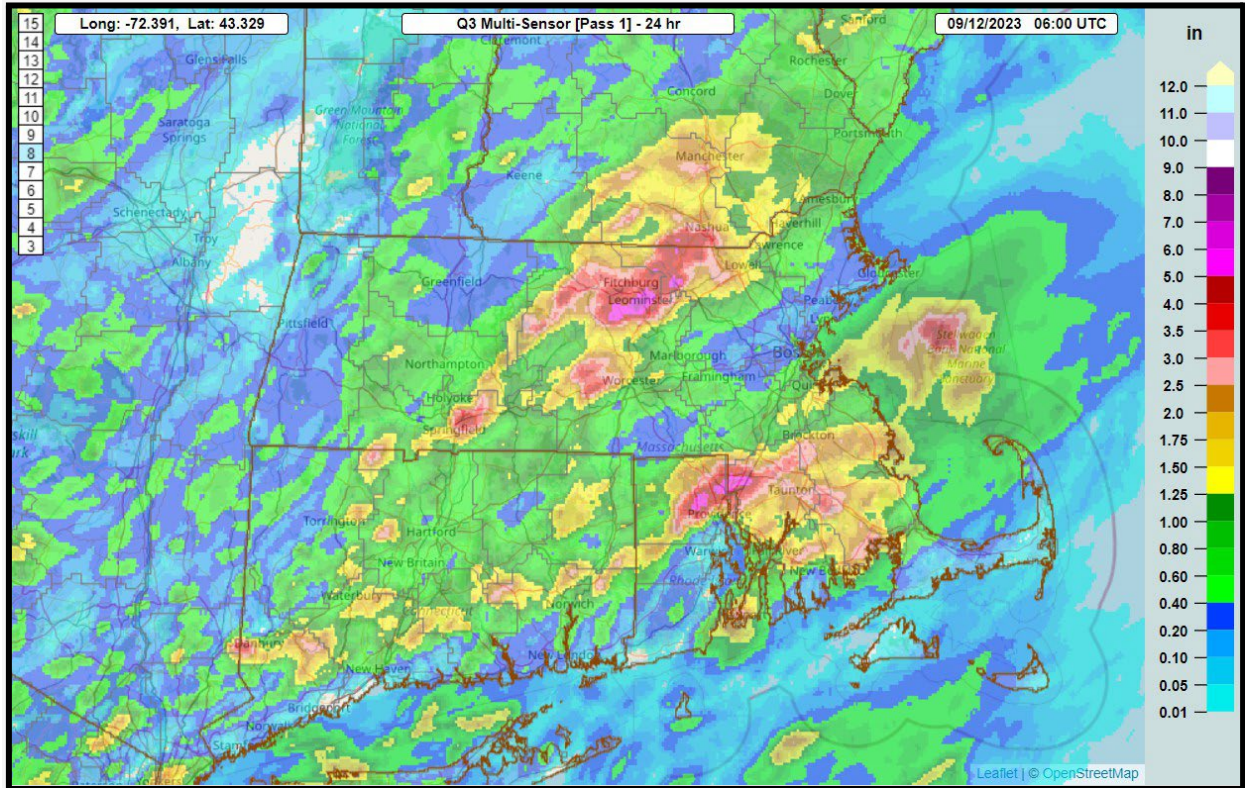
prevented access by emergency personnel. First responders performed numerous rescues due to cars that were stranded or submerged in water. The impact of this event was felt throughout the local mutual aid and state systems as personnel and assets were diverted to the incident areas. The response consumed local and state staff time and exhausted available resources due to significant flash flooding conditions that caused extensive roadway destruction and left debris that restricted travel and emergency operations.

The Massachusetts Emergency Management Agency (MEMA) began responding to the storm on September 11, 2023. Governor Maura Healey directed the execution of the State Comprehensive Emergency Management Plan in accordance with Section 401 of the Stafford Act (42 U.S.C. 5121 *et seq.*). Activation of the State Regional Emergency Operations Centers (EOCs) to respond to the storm began on September 11, 2023, including the operation of a Virtual State EOC (SEOC). The SEOC was in an Enhanced Watch status throughout the event and a 24/7 Duty Officer began developing and distributing regular Situational Awareness Statements for state, local, and volunteer partners.

Extensive impact was seen specifically in the City of Leominster, located in Worcester County. MEMA Director Dawn Brantley and a team of regional staff arrived onsite in Leominster on the evening of September 11 to provide direct assistance to the city. The American Red Cross operated two (2) shelters in Leominster with a total of 76 residents. They completed damage assessments for 19 addresses and provided financial assistance to 12 households consisting of 25 adults and six (6) children. The American Red Cross distributed 96 clean up kits. Thirty volunteers were mobilized with an estimated 240 hours worked.

### **Overview of Flash Flooding And Severe Weather in Massachusetts September 11 and 13, 2023**

During the afternoon and evening hours of September 11, 2023, a stalled frontal boundary generated slow moving heavy showers and thunderstorms with high rainfall rates. These storms continually redeveloped over portions of central and northeastern Massachusetts during this same time period, leading to flash flooding in several locations. The City of Leominster was hardest hit and the local National Weather Service Office in Norton, MA issued a Flash Flood Emergency as a result of the flooding. On this day, Leominster recorded approximately 9.5 inches of rainfall, as shown in the Figure below:



24-hr Estimated Rainfall Map ending at 2 am EDT September 12, 2023 (source National Oceanic and Atmospheric Administration - this data can be viewed [here](#))

September 11, 2023 Storm Reports for Leominster

County	Location	Date/Time	Summary
Worcester	1 N Leominster	2023/09/11 5:10 PM	Exchange St flooded with basement flooding also occurring Relayed by amateur radio.
Worcester	1 NE Leominster	2023/09/11 5:30 PM	Multiple roads flooded and impassable in and around Leominster.
Worcester	Leominster	2023/09/11 6:10 PM	Two cars flooded and disabled in a parking lot off Sack Blvd.
Worcester	Leominster	2023/09/11 6:30 PM	Multiple reports of numerous roads flooded and impassable. Some water rescues in progress.
Worcester	Leominster	2023/09/11 6:44 PM	Route 2 Eastbound near exit 99 under 3 feet of water.
Worcester	Leominster	2023/09/11	Culvert at Pleasant St and Colburn St has

		7:34 PM	washed out the foundation of house, Residents evacuated.
Worcester	Leominster	2023/09/11 8:00 PM	Route 2 near Route 12 closed due to flooding.
Worcester	Leominster	2023/09/11 8:01 PM	Pond St and Pleasant St, a sink hole has formed and the water rushing in has washed away part of the road.
Worcester	Leominster	2023/09/11 8:40 PM	Route 117 has a section of road buckled.
Worcester	Leominster	2023/09/11 9:30 PM	Multiple reports of home evacuations. Including a trailer park of 30 people on Central Street.

*Sep 11, 2023 Local Storm Reports for flooding and flash flooding (source: National Oceanic and Atmospheric Administration, 2023)*

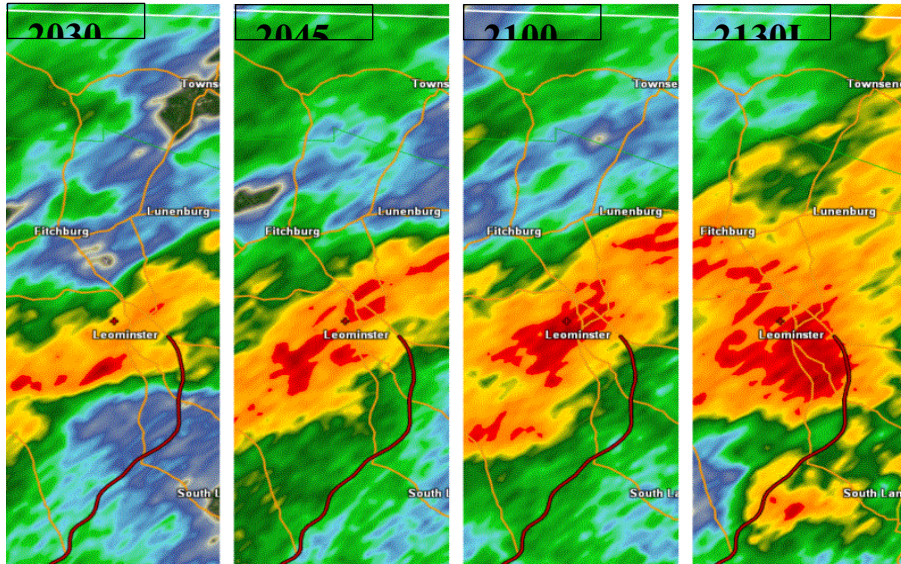
## **Meteorological Investigation of Severe Flooding in Leominster, MA 9/11/2023**

Below is excerpted from a report created by MEMA's Agency Meteorologist:

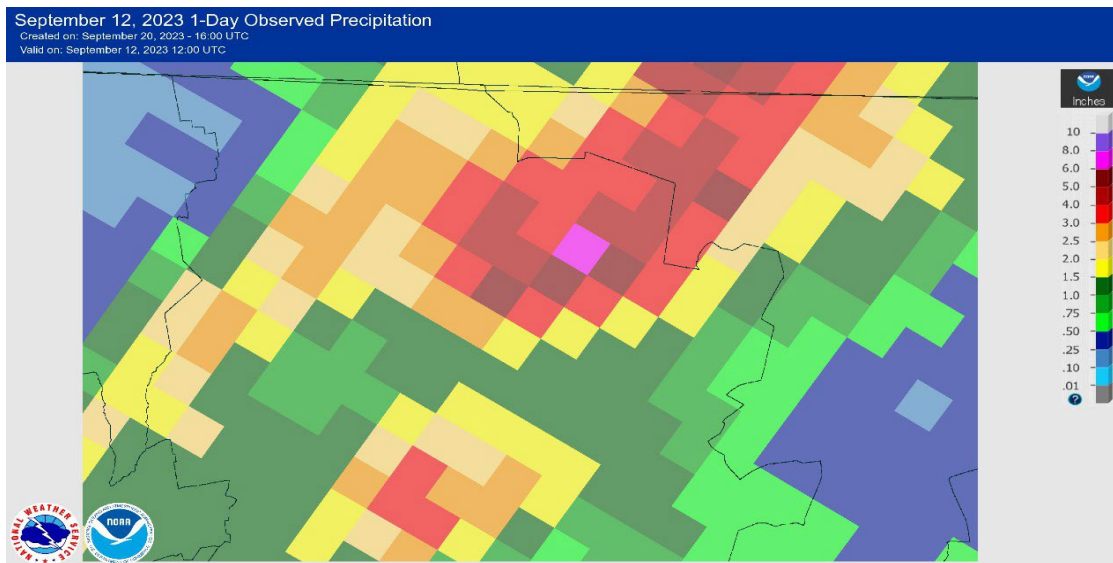
The city of Leominster, Massachusetts, situated in northern Worcester County in the north-central part of the state, experienced severe flooding on Monday, September 11, 2023. Over the preceding last 3 months, since the middle of June 2023, Massachusetts had witnessed numerous instances of heavy rainfall, leading to flooding in several municipalities and causing extensive damage to infrastructure and property. From June 19<sup>th</sup>, 2023 to approximately September 2023, Worcester County received 21-25 inches of rainfall, which is 10-15 inches above the 1991-2020 climatological normal. Given the abundance of precipitation, soil moisture readings down to 100cm indicate that Leominster's soil moisture was in the 95-99<sup>th</sup> percentile, ranking within the top 5% of historical measurements. These pre-existing conditions were crucial as heavy rainfall on highly saturated soils can further amplify the impact of heavy rainfall on flooding events (Ran, et al., 2022).

Observing radar imagery from KBOX, scattered thunderstorms began developing north of Leominster just after 14:00 LT. By 20:00 LT, these thunderstorms quickly increased in coverage and intensity and began developing over the city. At 21:17 LT, the city had already received 2 inches of rain per radar derived precipitation measurements and local officials reporting rain amounts. Flash Flood Guidance from the National Weather Service, which is a measure of how much rainfall needed in a particular period to generate flooding, indicated that at least 1.7 inches of rain, within one hour, was needed to generate flooding. With the observed 2 inches received in an hour's time, flooding began to impact the city. As such, the National Weather

Service Boston/Norton Forecast Office, issued a Flash Flood Warning for the Leominster area. Local rain reports, in addition to radar observed rainfall, indicated 2 inches of rain had occurred since the storms began over the city around 20:00 LT. This was indicative of a nearly 2 inch per hour rainfall rate. Thunderstorms producing these high rainfall rates persisted through 20:00 LT, resulting in observed rainfall amounts of 7-10 inches across portions of the city. As a result of the overabundance of rainfall within a 4–5-hour period, numerous instances of flooded or washed-out roadways, sink holes, water rescues, and inundated buildings were reported.



*Image: Radar Imagery KBOX Showing Training Storms*



*Image: Observed Rainfall Amounts: via NWS Boston/Norton. (Leominster resides in the pink pixel)*

As the day progressed, atmospheric energy concentrated along the stationary front, squeezing high moisture content into Leominster's vicinity. Radar imagery from KBOX revealed that thunderstorms began forming north of Leominster around 2 PM, growing in coverage and intensity by 4 PM. A Flash Flood Warning was issued at 5:17 PM, with local rain reports and radar data indicating a near 2-inch per hour rainfall rate. This exceeded the 1.7-inch threshold for flash flooding according to Flash Flood Guidance from the National Weather Service.

Thunderstorms with rainfall rates up to 2 inches per hour continued until 8 PM, resulting in total rainfall amounts of 7-10 inches, that were reported across portions of Leominster within a 4–5-hour period. This led to numerous instances of flooded and washed-out roads, sinkholes, water rescues, and inundated buildings, highlighting the severity of the flooding event.

## Impact Photographs:



Flooding opened Pleasant St. and bared the foundation and made this home inhabitable at the intersection of Colburn St. in Leominster. September 12, 2023 (Photo credit, Chris Christo/Boston Herald)



Large sinkhole at the Durand Cadillac dealership on Main St, in Leominster. (Photo credit GARY FOURNIER)



Entire vehicles were nearly entirely submerged, and apartment buildings and businesses flooded. Leominster on the evening of September 11, 2023 (Photo Credit MICHAEL GRATTOROTI)



More submerged vehicles and flooded businesses along Central Street in the Downtown Leominster business district. Evening of September 11, 2023 (Photo Credit unknown)



Workers measure MBTA tracks where heavy rains washed away the ground off Route 13 near Hamilton St. in Leominster. September 12, 2023 (Staff Photo Chris Christo/Boston Herald)



Barret Pond Dam overtopping and partial washout caused by flooding on September 11, 2023 (photo credit unknown)

The City of Leominster, Worcester County, reported the following impacts: On September 11, 2023, the City of Leominster received 11 inches of rain in four (4) hours. As certified by NOAA, this constituted a 200-year storm. From 4:30 p.m. to approximately 10:30 p.m., nearly every primary road in Leominster was inundated with water, causing a high risk to the life and safety of residents. Overnight, residents and businesses were put at further risk by the potential of two primary dam collapses.

As described below, major damage to several sites led to widespread risk to residents and property. The night of September 11, 2023, the Massachusetts Office of Dam Safety (ODS) responded to the City's request to inspect the Barrett Park/Colburn Pond and Distributing Reservoir Dams. ODS identified extensive embankment loss which threatened dam integrity. These two dams held, but the water overtopped them causing substantial damage to the dams and their spillways. The ODS recommended evacuations of hundreds of people downstream from these dams. Messages were posted on Code Red and Facebook at 4:35 AM to alert residents of the Barret Park Pond Dam neighborhoods that: *“Due to a potential issue at the Barrett Park Pond Dam, as a precautionary measure, persons in low lying areas of the Fall Brook tributary to Fall Brook along Central Street, Fall Brook, and the North Nashua River in Leominster, should immediately evacuate and safely leave the area. City shelter available at Skyview Middle School. If you need transportation, call 911.”*

Downstream from the Distributing Reservoir, there was extensive damage to Exchange Street which runs adjacent to the Slack Brook – a tributary of the Distributing Reservoir. The brook overtopped the bridge, caused significant damage to the roadway, and washed away the bridge to three (3) homes. The Massachusetts Department of Transportation (MADOT), at the City's request, had to build a temporary roadway to allow residents to access their homes.

The Monoosnoc Brook also overtopped in the downtown area in several locations. The first was in the lower Pleasant Street area. Businesses in the area were flooded by as much as five (5) to six (6) feet of fast-moving surging water. Some businesses were closed for up to three (3) weeks. Leominster Credit Union's primary branch and drive-thru are closed indefinitely due to extensive damage.

The area to the south and west of the business district is comprised of mainly multi-family homes. These homes had as much as six (6) to eight (8) feet of water in their basements, destroying their heating systems/hot water heaters and electrical panels. Six (6) days after the flood, Leominster had to order mandatory evacuations of these homes due to fire risk related to the damage to electrical panels. Ultimately, the Leominster Fire Department ordered electricity be shut off to the entire neighborhood, which included 30 multi-family homes, until all electrical panels were properly repaired. These families are all in a low income neighborhood.

In the Adams and Pleasant Street area, the Monoosnoc Brook overtopped its banks and poured into buildings containing 100 residential units of mostly designated affordable housing. Cars were submerged, water infiltrated the first floor of both buildings, and people were stranded in the parking lot including a person in a wheelchair. One building is deemed 100% affordable housing and the other building is 75% affordable housing.

The City of Leominster, under the direction of Leominster Emergency Management, opened two shelters. Frances Drake Elementary School was opened as a shelter Monday evening, September 11 through Wednesday, September 13. This shelter served those whose homes were flooded and those who were encouraged to evacuate due to the possibility of the failure of either the Distributing Reservoir Dam or the Barrett Park Dam. There was an average of 105 people sheltered there each day. The City also readied SkyView Middle School in case it was needed. On Saturday, September 16, the Leominster Fire Department found unsafe living

conditions in multiple residences in a downtown neighborhood and ordered evacuations due to the electricity being shut off. Skyview was opened as a shelter on Saturday, September 16 through Sunday, September 17 and had approximately 10 people in it each day.

Leominster has a significant Imi population. The City received 500 residential impact reports within the first three (3) days of the event. Of the initial 500 reports, the City calculated that 61% of the residents were from high need/Imi neighborhoods.

Further downstream on the opposite end of downtown, the Monoosnoc overtopped its banks and flooded many downtown businesses. Related to this area was the collapse of Mechanic Street, the main road into downtown Leominster. The sidewalk, road, and supporting infrastructure under the road/above the brook will need to be redesigned and rebuilt. The parking lot adjacent to Mechanic Street containing more than 30 spaces remains compromised. Overall, the City had 33 downtown buildings that were flooded, some with multiple businesses. Downtown is completely within the high need/Imi identified area. Further downstream, the Monoosnoc Brook flooding caused the partial building collapse of the Tilton and Cook Building, a multi-level commercial building with approximately 40 businesses in it.

The collapse of the building caused the redirecting of the Monoosnoc Brook into an adjacent building which includes a mental health facility along with several other businesses.

The City's 10-story elderly and disabled complex with 120 residents was flooded and lost its entire electrical panel. Due to limited hotel space in the area, residents sheltered in place with limited power provided by a generator. After five days, all residents were bused 30 minutes away to an available hotel location until permanent repairs could be made.

In north Leominster, a culvert collapsed sending water to the MBTA commuter rail causing the complete washout of the ground underneath the tracks. The Leominster Fire Department was able to signal an oncoming train in just enough time for it to stop prior to the rail failure. Debris from the washout ended up on and in a two-family home on Hamilton Street, blocking access to the north Leominster Fire Station. Just to the south of this situation, the Nashua River overtopped Route 13 causing a sinkhole that swallowed several cars at the car dealership and caused significant damage to the nearby infrastructure including a nearby parking lot which is still unstable.

Throughout the City, roads have been undermined, culverts have been significantly damaged, and critical infrastructure has been exposed. The impact to local government

is substantial. In the Leominster City Hall, water entered the bottom level of the building through the floor and flooded the entire downstairs level with ground water and sewer backup from the facilities. The Leominster Health Department relocated to the Leominster Public Library while their office is rebuilt including replacement of all furniture, walls and floors. The Leominster Purchasing Department and Leominster Health and Benefits office were temporarily relocated to the Auditorium upstairs in City Hall. The Leominster City Council chamber was flooded with raw sewage and water. The entire chambers must be gutted and replaced including walls, floors and furniture. The City Council was temporarily holding meetings in Appleseeds Restaurant at Leominster High School. The Leominster sewer treatment plant flooded and had to be mucked out and repaired.

Leominster Public Schools were closed Tuesday, September 12, Wednesday, September 13 and a portion of Thursday, September 14 due to flooding on the first floor of Northwest Elementary School and Leominster High School. Several roads were also closed from damage, so buses could not get through. Due to damage, several classrooms at Northwest Elementary School continue to be held in the gym.

The Christian Life Center, located at 53 Main Street, downtown Leominster had eight (8) feet of water in the basement and experienced significant building damage including electrical. The Christian Life Center not only serves as a Christian church, but a center for youth activities in the City of Leominster. The Congregation Agudat Achim synagogue, located at 268 Washington Street, suffered significant damage to the basement and function hall and they remain closed. Both locations are temporarily using Leominster City Hall Auditorium for services (sharing the space with city offices).

Over 930 residents and businesses submitted Initial Damage Assessment (IDA) surveys to MEMA to explain the damage they sustained. Additionally, some residents and business owners went directly to the town to document the damage. There were hundreds of water heaters and furnaces that needed to be replaced. Many also needed full electrical panel replacement. Hundreds had finished basements, and many use their finished basement for multi-generational living.

Additionally, a trailer park with 266 people and 167 trailers located at 556 Central Street needed to be evacuated during the storm.

The trailer park is located on Central Street (Route 12). It sits in a low-lying area next to Fall Brook and wetlands. The topo map below shows the water running through the trailer park which caused the flooding. Water rescues had

to be performed by the Leominster Fire Department. FEMA assisted many of the residents with replacing their under-trailer electrical units for heating and cooling.

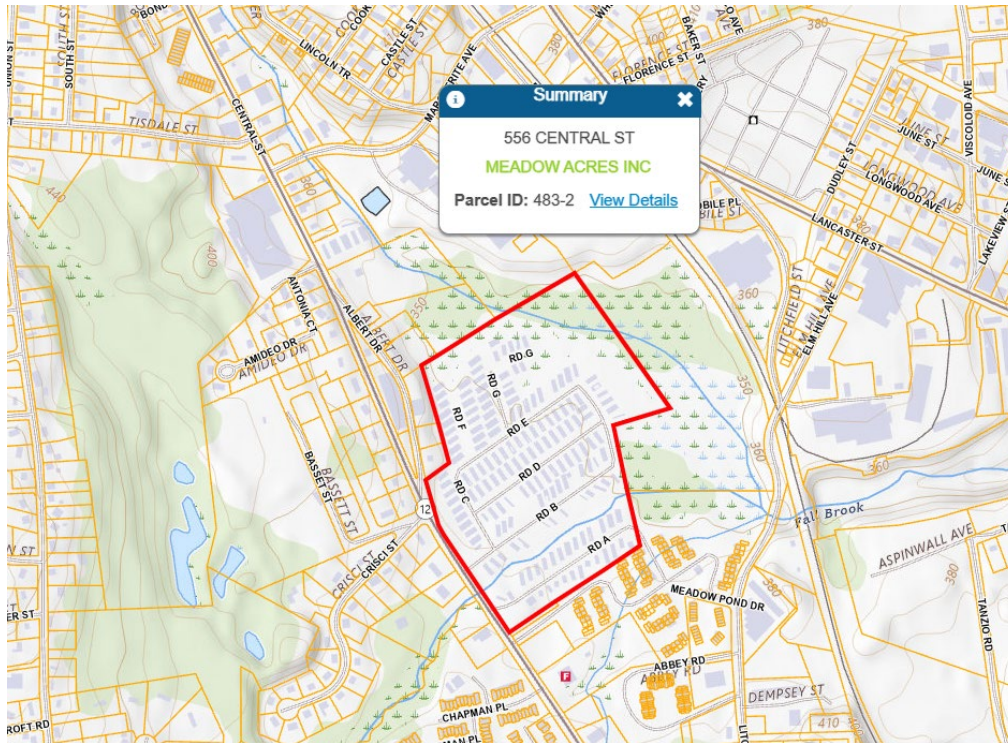




Photo courtesy of MassLive

There were also individual homes throughout the City that needed to be evacuated due to flooding inside their homes.

## Most Impacted and Distressed Areas

### HUD identified MID Areas

CDBG-DR grantees must describe the unmet need in the HUD identified MID areas, as the allocations are based on unmet needs of these specific communities, which are the least likely to fully recover without additional assistance. Grantees are required to use at least 80 percent of the CDBG-DR award to benefit the HUD-Identified MID areas. However, HUD encourages all grantees to consider using 100 percent of its award to benefit HUD identified MID areas since the data from these areas were used to determine the amount of the award.

For this Action Plan, EOHLC will be directing 100 percent of the award (minus administration) to the HUD identified MID area (Leominster, MA). There will be no

grantee-identified MID area.

## Overview of the Impacts of the Qualifying Disaster

### Disaster Overview

Disaster Summary	
<b>Qualifying Disaster:</b>	FEMA Disaster #4780
<b>HUD-identified MID Areas:</b>	Worcester County; ZIP code 01453 (Leominster)

### CDBG-DR Allocation Overview

CDBG-DR Allocation Overview:	
<b>CDBG-DR Allocation:</b>	\$6,917,000
<b>CDBG-DR Mitigation Set Aside:</b>	\$1,037,000
<b>Total Allocation:</b>	\$7,954,000

From HUD’s State of MA Allocation Briefing document:

The basic formula for allocating these funds is to calculate for each disaster meeting a minimum “most impacted and distressed” damage threshold a formula that uses an estimate of unmet needs for housing, economic revitalization, and infrastructure plus 15 percent more for mitigation. The unmet needs and mitigation are slightly greater than the amount to be allocated, so the amount allocated reflects the unmet needs and mitigation less a 1.2488 percent pro-rata reduction.

**Section 1** shows the allocation as per the AAN (90 FR 4759) published on 16 Jan 2025.

Table 1. CDBG-DR Allocations for CY 2023/2024 Most Impacted and Distressed Qualifying Disasters

State	Grantee	Disaster	Allocation Award
Massachusetts	State of MA	4780	\$7,954,000

**Section 2** provides detailed information of the component parts of data used to determine the formula allocation.

Table 2. Components of Unmet Need for the **State of Massachusetts** by disaster.

Disaster Number	Disaster Description	Homes with Serious Unmet Housing Needs	Housing Serious Unmet Needs	Business Serious Unmet Needs	Infrastructure Unmet Needs	Total HUD Formula Unmet Needs
4780	Flood	113	\$5,836,843	\$583,684	\$583,684	\$7,004,000

Table 3. Components of Unmet Housing Need for the **State of Massachusetts**.

Grantee	Disaster Number	Homes with Serious Unmet Housing Needs	Percentage of State	Unmet Housing Need	Total Unmet Need	Mitigation (15%)	Disaster Total (Need + MIT)
State of MA	4780	113	100%	\$5,836,843	\$7,004,000	\$1,051,000	\$8,055,000

Total HUD Formula Unmet Needs + 15 % Mitigation – pro-rata reduction = **\$7,954,000**

# Unmet Needs Assessment

Grantees must assess the unmet needs of the disaster to strategically inform and guide the use of the grant funds. The unmet needs assessment will help a grantee evaluate community needs across its jurisdiction by assessing the remaining effects of the qualifying disaster as they relate to housing, infrastructure, and the economy.

## Evaluation of the Impacts of the Three Core Aspects of Recovery

EOHLC was required to perform an evaluation of the three cores aspects of recovery – housing, infrastructure, and the economy, which considers the pre-disaster needs that have been exacerbated by the disaster. The assessment of housing needs must address 1) emergency shelters; 2) interim and permanent housing; 3) rental and owner-occupied single family and multifamily housing; 4) public housing (including HUD-assisted housing) and other types of affordable housing, including housing for vulnerable populations (including those who were unhoused prior to the disaster).

## Housing Profile

The majority of the housing market in Leominster is comprised of single-unit, detached homes. According to 2019-2023 American Community Survey (ACS) 5-year estimates, 63% of the homes are owner-occupied, and 37% are renter occupied. Only 4% of homes are vacant. As throughout the State, Housing affordability is a challenge. The cost-burden is high with 33% of homes spending more than 30% of their income on housing related expenditures and 16% spending more than 50%.

The age of the housing stock itself is also older with the percentage of owner-occupied homes built prior to 1980 at 62% and the percentage of renter-occupied homes built prior to 1980 at 71%. These homes tend to have more health hazards such as lead and asbestos and also the potential for more deferred maintenance.

Per the 2019-2023 ACS, 53% of the residential inventory is in structures with only one unit; 10% is in 2-units structures and 10% in structures with 3 or 4 units. Residential buildings with 5 to 49 units are 23% of the inventory, while those with 50 or more units represent a minor amount at 3%. 1% of the inventory falls under the category of mobile home.

### **Exacerbated Pre-Existing Needs of Housing**

#### **Emergency Shelters, Interim, and Permanent Housing**

There was not a significant increase in number of applicants from Leominster for this type of housing post-disaster, however, we have requested data from the Worcester CoC, as that data may tell a more complete story.

#### **Emergency Assistance**

Between 1/1/2023 through 12/31/2024, 36 families whose Home Community was in Leominster applied for Emergency Assistance Family Shelter

- 9 applied during the 6 months prior to the flood
- 5 applied during the 6 months after the flood, including 1 family that applied on 9/13/2023
- Of the families applying during this period, only one indicated that their reason for homelessness was due to a natural disaster. That family applied on 7/19/2024.

#### **HomeBASE**

**This program provides flexible financial assistance to families experiencing homelessness to help them exit shelter and find long-term housing.**

In the 6 months before and after the flood, 8 families from Leominster began receiving HomeBASE.

- All but one of the families used HomeBASE to help them leave shelter so would not have been turning to HomeBASE because of the flood
- 1 family took HomeBASE as an alternative to shelter; that case was opened the week of 1/28/2024 – 2/3/2024

#### **RAFT**

**This program provides short-term financial assistance to low-income households at risk of homelessness.**

In the 6 months preceding the flood, 190 families from Leominster applied for RAFT household assistance. In the 6 months after the flood, 191 families from Leominster applied for RAFT household Assistance

## **Rental and Owner-Occupied Single Family and Multifamily Housing**

As detailed above in the Housing Profile there is a high-cost burden for both owner-occupied and rental units. The impact of the storm resulted in property loss and damage. The cost of dealing with the immediate impact of the storm only added to the cost burden.

## **Public Housing (Including HUD-assisted Housing) and Other Affordable Housing**

The Leominster Housing Authority's Building at 100 Main Street was flooded. The entire electrical system is in the basement. They hooked up a generator to the building but because the building is 10 floors with 116 units it only powered the elevator and emergency lighting. They ended up moving residents to a hotel in Boxboro, MA for 4 days to keep everyone together so they could provide services such as food, medicine coordination, etc. The Mayor's office, through ARPA, provided \$10,000 to the Housing Authority to help residents replace the food that went bad in their refrigerator. Two weeks later, there was another rainstorm and the sump pump failed. The basement partially flooded, and the electrical system had additional damage, which required replacement. The residents were brought back to the hotel for another 6 days until the system was replaced. The Mayor's office paid another \$10,000 to replace all the food.

According to Leominster, all work is complete at the housing authority. Per the building department file, they spent about \$50,000 on new electrical panel, some new HVAC units, and damage to the basement.

### **Other Financial Assistance**

Leominster received \$4,822,402.62 in Individual Assistance from FEMA.

Leominster's initial estimate was that it had 1,000 homes and businesses damaged, many within a high need/low income neighborhood. On October 12 and 13, 2023, FEMA responded to Leominster to survey the damage. With the assistance of MEMA and the Governor's office, the City submitted a disaster declaration to FEMA for both Individual Assistance and Public Assistance. Despite over 800 household claims submitted to FEMA and substantial documentation on the city side, the disaster declaration was denied in both categories. The City then appealed and was ultimately approved for a declaration for Individual Assistance only.

In May of 2024, FEMA arrived in Leominster to establish an application center for homeowners and businesses. Ultimately, 838 homes and businesses were awarded some level of funding. This aid totaled \$4.8 million.

According to Leominster staff, shortly after the flood and before FEMA aid arrived, the City of Leominster undertook a fundraising campaign to assist our residents. They raised and spent \$522,482.05 on 74 businesses and homes. After the FEMA funding was disbursed, the state legislature provided the City with another \$500,000.00 for homeowner needs through a state earmark. They assisted 54 people with those funds. For both the donated and state funds, Leominster used very specific process based on needs and salary, starting started with those that qualified under CDBG guidelines and had damage to their water heater, furnace, or electrical panel so that they could get safely back into their homes. The program was strongly marketed through the City's newsletter, social media, and in the news. At the time when the last of the \$500,000 was being spent, the City had completely lifted the income guidelines and expanded the categories to include mold remediation because there was no one left with storm damage.

NewVue Community Development Corporation's housing services team received a number of calls for help and they made referrals to agencies who could provide immediate assistance.

As stated previously, ARPA funding was used to assist those in public housing.

### **Remaining Unmet Need**

EOHLC is continuing to assess data in this category. While an exact dollar figure is not available, the qualitative and quantitative information collected as part of the development of the Action Plan indicates that much of the most urgent need in this category has been addressed through other funding sources.

If additional information becomes available, the Action Plan will be updated through a non-substantial amendment.

## **Infrastructure Profile**

### **Infrastructure**

Below is excerpted from Leominster's Local Hazard Mitigation Plan:

Transportation Infrastructure Interstate Route 190 is the main roadway entering Leominster from the South. It meets Route 2, the main east-west route, which travels across the northern region of Massachusetts. There are several other main roadways, including the north-south

Route 12, Route 117, and Route 13. All are in the east-central portion of the City. There are no major roadways that service the west-central portion of Leominster south of Route 2.

According to the MassDOT Road Inventory Municipal Data Viewer, there are 186.13 miles of roads in Leominster, with 163.40 miles (87.8%) under the jurisdiction of the City. The remaining roadways are either unaccepted (9.52 miles), or under the jurisdiction of MassDOT.

Numerous bridges and culvert crossings are located within Leominster.

Transportation Infrastructure	(#)
MassDOT Bridges	27
Municipal Bridges	24
Culverts	12

The Massachusetts Bay Transportation Authority (MBTA) Fitchburg Branch line runs through the City, and provides commuter service to Boston. The North Leominster train station provides access to this railroad. rail systems currently provide commuter or other types of freight service to Leominster. There is a CSX commercial/ industrial rail line that runs north-south through eastern Leominster.

### **Exacerbated Pre-Existing Needs of Infrastructure**

According the City of Leominster – they have proactively pursued grants for more than 20 years and many of those grants have been direct infrastructure grants to roads, sidewalks and water/sewer infrastructure. According to City staff, this flood has set them back a minimum of 30 years, particularly with culverts. In addition to having to repair the damage, recent grant funding was also lost. For example, a culvert on Litchfield Street was rebuilt in 2020 using grant and city funds. Despite being relatively new, that culvert has significant damage. Another example is the brand-new paving and sidewalks that have been done this year that collapsed into Monoosnoc Brook, the Pleasant Street sinkhole, and other areas. This not only is a loss of new grant funding during 2023, but the City will also now have to pay for these projects again.

According to Leominster, September, October, and November are busy months for the Department of Public Works (DPW) – trying to get projects done before winter. From approximately September 12 through the end of October, 2023, all DPW employees were dedicated to flood damage remediation. Water main work stopped, they had to hire an outside company to do basin cleaning which is something they would usually do in-house, and new damage continued to crop up throughout the winter. One month after the flood, FEMA was in Leominster surveying damage and a new sink hole opened up.

Priorities were also shifted. As one example, Elm Street paving that would have been several years away and should have been a basic paving job, will now need to be moved ahead of other paving jobs and will be more expensive because of the added drainage needs from the flood. Another example is that they will be looking to go out to bond for the major upgrades to the Fall Brook Reservoir system. If Distributing Dam isn't funded through grants, it will have to be bonded which will take away some of the City's debt capacity.

Lastly, some work that had just recently been completed was destroyed by the flooding event:



*\$12,000 had been spent on Mechanic Street – pictured above*



*\$260,000 paving of Pleasant Street – pictured above*

**Other Financial Assistance and Remaining Unmet Need**

Healey-Driscoll Administration Distribution to Leominster for flood disaster relief – The state legislature made \$15 million in funds available through a supplemental budget bill in December 2023. \$5 million of that money was held back while Worcester and Bristol counties went through the Federal declaration process. After the Public Assistance declaration (and appeal) was finally denied, the state’s Executive Office of Administration and Finance distributed \$3.6 Million to the City of Leominster on June 14, 2024. These funds were intended to support the repair of public infrastructure. See [Healey-Driscoll Administration Distributes \\$5 Million in Disaster Relief Funds to Communities Impacted by Severe Storms | Mass.gov](#) These funds are committed to infrastructure projects in the pipeline and DR funds would not displace any of the funding already set-aside.

DR-4780 – Federal Highway Administration Emergency Program Fund Allocation (EPFA) - \$3,397,569.86 were obligated in Federal FY2025 to Massachusetts for “MA23-1, September 11, 2023, Storms and Flooding Statewide”

Below is a chart of showing projects (with exact addresses redacted) that have been paid for/grant awarded and funding still needed:

Project Number	Site Name	Status	Total Project Cost	Notes	Paid for or Grant Awarded	Funding Still Needed
1	██████████ Parking Area	Area was determined to be private property, and responsibility of Business/Homeowners. No further City action has been taken	unk.	area was repaired by private landowner	Yes	\$0.00
2	██████████ Main Street Drainage	Project was listed on our Federal Highway request, but was determined ineligible due to being outside of their jurisdiction. If City plans to perform this work, funding will need to be pursued. Currently no easements exists & would need to be recorded before any work.	\$490,000.00	private property	No	\$490,000.00
3	Access Road to West Street Water Tank	DPW Staff made access road passable and can consider this project complete. No further action required at this time	\$2,660.00	Completed by City	Yes	\$0.00
4	Anthony Road Culvert	The City hired a contractor to complete this work. No further action required at this time.	\$156,000.00	City hired a contractor to complete	Yes	\$0.00
5	Arlington Street Culvert	The City hired a contractor to complete this work. No further action required at this time.	\$34,450.00	City hired a contractor to complete	Yes	\$0.00

6	Fallbrook Sanitary Sewer Trunkline	The City intends to address this erosion overtime and does not pose an immediate threat to sewer infrastructure. No need to pursue additional funding at this time	\$22,140.00	City will repair over time	No	\$22,140.00
7	Ash Street Culvert	The City hired a contractor to complete this work. No further action required at this time. **This work was paid for out of DPW's Sanitation & Drainage Account**	\$148,500.00	City hired a contractor to complete	Yes	\$0.00
8	Barrett Park Dam	Rec Dept has been working on grant for design/repair. I am not sure the exact status of the repair.	\$1,500,000.00	City has received \$1,000,000.00 grant from the state's Dam Safety Program	Yes (partially)	\$500,000.00
9	Behind Doyle Field	DPW Staff filled sinkhole and can consider this project complete. No further action required at this time	\$1,250.00	City has completed	Yes	\$0.00
10	Birch Street Culvert	DPW Staff made roadway passable. The culvert could use a dredge/cleaning to remove excess debris, but would not be considered a priority at this time	\$19,000.00	City has completed and will monitor	Yes	\$0.00
11	Birchcroft St Culvert	DPW Staff made roadway passable and can consider this project complete. No further action required at this time.	\$1,000.00	City has completed and will monitor	Yes	\$0.00
12	Colburn St Drain	Outfall is still in need of repairs (as is the brook). It is unclear if this work can accompany the repairs at Pleasant St (under Federal highway), but if not, will need additional funds.	\$157,000.00	This repair will be completed in the Pleasant and Colburn Street project (MassDOT)	\$157,000.00	\$0.00
13	Decicco Drive Culvert	Site is still in need of repair. Discussions of including this work into the Fall Brook School Rehab/replacement has taken place, but not committed.	\$170,319.00	This project is now being designed and funding committed to under the school department Fall Brook project. The City will still be paying for it, but under the school building project.	Yes	\$0.00
14	Distributing Reservoir Dam	Site is still in need of repair. DPW WOULD CONSIDER THIS SITE ONE OF THE HIGHEST PRIORITY SITES. Funding for design & replacement/repairs are needed.	\$5,950,000.00	This project is currently under design (\$450,000) using the City's emergency fund provided by the state.	Yes (partially)	\$5,500,000.00

15	Elm St Haynes Brook	Site stabilized and passable. Further restoration work should be completed, but not a top priority. A DER grant application was submitted ( <b>AND APPROVED</b> ) for Site Survey.	<b>\$1,500,000.00</b>	The cost of \$250,000 is just for the survey work. A cost for the total repair has not been determined. Estimated at \$1,500,000	Yes (partially)	<b>\$1,250,000.00</b>
16	Elm St Bartlett Pond Tributary	Site stabilized and passable. Further restoration work should be completed, but not a top priority.	<b>\$72,595.00</b>	future work will be needed	No	<b>\$72,595.00</b>
17	Elm St Diversion Basin	DPW Staff made roadway passable and can consider this project complete. No further action required at this time.	<b>\$22,900.00</b>	City completed the work	Yes	<b>\$0.00</b>
18	Elm St Shoulder Washout	Roadway edges stabilized and passable. Roadway was narrowed due to edge washouts on both sides. Further restoration work should be completed to bring roadway back to full width, but would likely not be until the entire roadway is due for re-paving	<b>\$364,265.16</b>	future work will be needed	No	<b>\$364,265.16</b>
19	Erdman Way Sanitary Sewer Trunkline	Site is still in need of repair. Project is on DPW's services contract, but funding for repairs are needed.	<b>\$139,090.00</b>	Still looking for funding source. This cost is only an estimate.	No	<b>\$139,090.00</b>
20	Exchange St Culvert at Colonial Drive	Project was listed on our Federal Highway request, but was determined only "partially eligible" due to work performed already by DOT to stabilize and make road passable. Update: remainder of the work was deemed ineligible by the state. The City will be applying to MassDOT for technical assistance. This project could easily top \$3 million.	<b>\$2,320,000.00</b>	Temporary repairs made. Denied federal highway aid.	No	<b>\$2,320,000.00</b>
21	Fall Brook	Site is still in need of repair. Discussions of including this work into the Fall Brook School Rehab/replacement has taken place, but not committed.	<b>\$210,000.00</b>	Waiting on possible wrapping into school project.	No	<b>\$210,000.00</b>
22	Granite Street Culvert ( [REDACTED] )	The City hired a contractor to complete this work. No further action required at this time.	<b>\$366,456.58</b>	City hired a contractor to complete	Yes	<b>\$0.00</b>
23	Granite Street Culvert [REDACTED]	The City hired a contractor to complete this work. No further action required at this time.	<b>\$150,000.00</b>	city hired a contractor to complete	Yes	<b>\$0.00</b>

24	Granite Street Twin Culverts (a.k.a Garden Spot)	Project was listed on our Federal Highway request, but was determined ineligible because the purpose of the program is not to fix undersized pipes. Funding to hire an engineer to redesign drainage layout and then construction funds are needed to prevent further issues here.	\$23,956.00	still needs a funding source to determine true cost and engineering	No	\$23,956.00
25	Granite Street	Should be included with site and work above	\$39,730.00	same as Granite Street above	No	\$39,730.00
26	Granite Street Sanitary Sewer Trunkline	This site still needs repairs and funding. At this point, lower on the priority list but should not be forgotten	\$72,500.00	still needs a funding source to determine true cost and engineering	No	\$72,500.00
27	Grant Street Culvert	DPW Staff replaced drain and rebuilt a new outfall (abandoned old outfall). Stabilization to headwall still needed.	\$76,000.00	some funding still needed. DPW did some work.	No	\$76,000.00
28	Hamilton St Catch basin	DPW Staff made repairs and can consider this project complete. No further action required at this time.	\$1,500.00	City completed the work	Yes	\$0.00
29	Hardy Drive Culvert	DPW Staff made repairs and can consider this project complete. No further action required at this time.	\$1,500.00	City completed the work	Yes	\$0.00
30	Imperial Drive Drainage System	This site still needs repairs and funding. At this point, lower on the priority list but should not be forgotten	\$61,000.00	still needs a funding source to determine true cost and engineering	No	\$61,000.00
31	Judy Drive Culvert	The City hired a contractor to complete this work. No further action required at this time.	\$140,000.00	City completed the work	Yes	\$0.00
32	Lancaster St., Malburn St. to Sage Ave	Project was listed on our Federal Highway request and was determined an eligible site. Funding is believed to be secured through federal highway and project to be completed by MassDOT	\$1,871,000.00	PROJECT DEEMED ELIGIBLE FOR FHA FUNDING THROUGH MASSDOT FOR FINAL REPAIR AND REIMBURSEMENT FOR EMERGENCY REPAIRS	No	\$1,871,000.00
33	Lawrence St at Railroad Bridge	The City hired a contractor to complete this work. No further action required at this time.	\$20,600.00	City completed the work	Yes	\$0.00
34	Liberty Street Drainage System	Site is still in need of repair. Project is on DPW's services contract, but funding for repairs are needed. Project could be lumped together with Erdman Way	\$40,000.00	still in need of funding and final cost determination	No	\$40,000.00

35	Litchfield St Culvert at Railroad	Project was listed on our Federal Highway request, but was determined ineligible because it had already been identified as having issues.. Design has been completed but funding needed to complete. Small Bridge Grant used for design funding. DER Culvert grant application was submitted and denied in 2022	<b>\$2,100,000.00</b>	\$1,000,000 has been secured from the state's Small Bridge Program and \$500,000 as part of the state's Housing Works program. We are still looking for funds to fill the estimated \$600,000 gap.	Yes (partially)	<b>\$600,000.00</b>
36	Litchfield St at Wilder Brook	The City hired a contractor to complete this work. No further action required at this time.	<b>\$52,415.00</b>	City hired a contractor to complete	Yes	<b>\$0.00</b>
37	Mechanic Street Bridge	Project was listed on our Federal Highway request and was determined an eligible site . Funding is believed to be secured through federal highway and project to be completed by MassDOT ***Will be considered separate from MVP Culvert Project Work**	<b>\$4,210,000.00</b>	MassDOT will be repairing this site. Final cost to be determined. City is responsible for any land appraisals or takings.	Yes	<b>\$0.00</b>
38	Marguerite Ave Culvert	DPW Staff made repairs and can consider this project complete. No further action required at this time. ***Site will be improved with MVP Grant to Mechanic St Culvert	<b>\$1,000.00</b>	City completed the work	Yes	<b>\$0.00</b>
39	Monoosnoc Brook Trunkline	Site is still in need of repair. Project is on DPW's services contract, but funding for repairs are needed.	<b>\$421,640.00</b>	Project still needs funding	No	<b>\$421,640.00</b>
40	Nelson Street Drainage System	The City hired a contractor to complete this work. No further action required at this time.	<b>\$22,503.17</b>	City completed the work	Yes	<b>\$0.00</b>
41	North Street Sanitary Sewer Trunkline	restoration work should be completed, but not a top priority.	<b>\$38,700.00</b>	Funding still needed and final cost needs to be determined	No	<b>\$38,700.00</b>

42	North Nashua River Exposed Sewer Main	Site in need of repair. GZA hired to engineer the project (engineering being paid by City) but funding for the repairs is needed and not secured.	\$600,000.00	Funding still needed and final cost needs to be determined. We requested a state earmark for this and it was awarded, but almost 2 years later, we have yet to see any funds.	Awarded, but delayed	\$600,000.00
43	North Street Culvert by █ North Street	Further restoration work should be completed, but not a top priority.	unk.	funding still needed and final cost needs to be determined	No	TBD
44	Old Farm Road	DPW Staff made repairs and can consider this project complete. No further action required at this time.	\$530.00	City completed the work	Yes	\$0.00
45	Pleasant St Culvert (at Wilder Brook)	DPW Staff made repairs and can consider this project complete. No further action required at this time.	unk.	City completed the work	Yes	\$0.00
46	Pleasant St Culvert 2 (at Fall Brook)	DPW Staff made repairs and can consider this project complete. No further action required at this time.	\$17,025.00	City completed the work	Yes	\$0.00
47	Pleasant St Culvert 3 (at Colburn Street)	Project was listed on our Federal Highway request and was determined an eligible site . Demo of house is needed, but funding is believed to be secured through federal highway and project to be completed by MassDOT	\$2,150,000.00	MassDOT will be repairing this site. Final cost to be determined. City is responsible for any land appraisals or takings.	Yes	\$0.00
48	Prospect Street - Road Damage	DPW Staff made repairs and can consider this project complete. No further action required at this time.	\$11,000.00	City completed the work	Yes	\$0.00
49	Rockwell Pond Sanitary Sewer Trunkline	DPW Staff made repairs and can consider this project complete. No further action required at this time.	\$87,650.00	City completed the work	Yes	\$0.00
50	Scenic Drive Culvert	DPW Staff made repairs and can consider this project complete. No further action required at this time.	unk.	City completed the work	Yes	\$0.00
51	Slack Brook Road Culvert	Culvert needs to be cleared of debris to allow proper flow of water and prevent damming. Funding for permitting & restoration needed	\$90,000.00	still seeking funding for this project. To be combined with the Army Corp Slack Brook project	No	\$90,000.00

52	Slack Brook Army Corp	DPW has contacted Army Corp regarding getting this site back on their radar. We were informed this did not meet emergency requirements, and to get back on their radar was 5-6 year minimum.	\$1,120,000.00	Still seeking funding for this project. Final cost determination needs to be made.	No	\$1,120,000.00
53	Sylvan Avenue Culvert	The City hired a contractor to complete this work. No further action required at this time.	\$27,500.00	City completed the work	Yes	\$0.00
54	Tisdale Street Culvert	The City hired a contractor to complete this work. No further action required at this time.	\$58,350.00	City completed the work	Yes	\$0.00
55	Wachusett St Shoulder Washout	Roadway edges stabilized and passable. Roadway was narrowed due to edge washouts on both sides. Further restoration work should be completed to bring roadway back to full width, but would likely not be until the entire roadway is due for re-paving	\$166,076.00	road still needs work		\$166,076.00
56	Water Street Retaining Wall	The City hired a contractor to complete this work. No further action required at this time.	\$12,000.00	City completed the work	Yes	\$0.00
57	Wachusett Street Culvert	The City hired a contractor to complete this work. No further action required at this time.	\$40,000.00	City hired a contractor to complete	Yes	\$0.00
58	Willard Street Culvert by Jamestown Road	damage not as severe as originally projected. Some restoration could take place but not a priority	\$20,000.00	road still needs work	No	\$20,000.00
59	Willard Street Culvert by Willard Street	damage not as severe as originally projected. Some restoration could take place but not a priority	unk.	road still needs work	No	unk
60	Whitney St. @ intersection of Mill St. and Bishop St.	Project was listed on our Federal Highway request, but was determined ineligible because the purpose of the program is not to fix undersized pipes. Funding to hire an engineer to redesign drainage layout and then construction funds are needed to prevent further issues here.	\$203,000.00	still needs a funding source to determine true cost and engineering	No	\$203,000.00
61	Union St Culvert (at Union St)	Project was listed on our Federal Highway request and was determined an eligible site. Funding is believed to be secured through federal highway and	\$408,000.00	MassDOT project. City responsible for takings and appraisal only.	Yes	\$0.00

		project to be completed by MassDOT				
62	Monoosnoc Brook Bank Stabilization Project	After 4 years of permitting and engineering, the project has been funded by FEMA. The original grant was \$6.6 million with a match from the City of \$670,000.00. The project is so complex it came in at \$1.5 million overbid.	<b>\$8,700,000.00</b>	\$6,600,000 grant funds received	Yes (partially)	<b>\$2,100,000.00</b>
			<b>\$36,702,800.91 Total Project Costs</b>		<b>\$18,291,108.75 Paid or Awarded</b>	<b>\$18,411,692.16 Remaining Need</b>

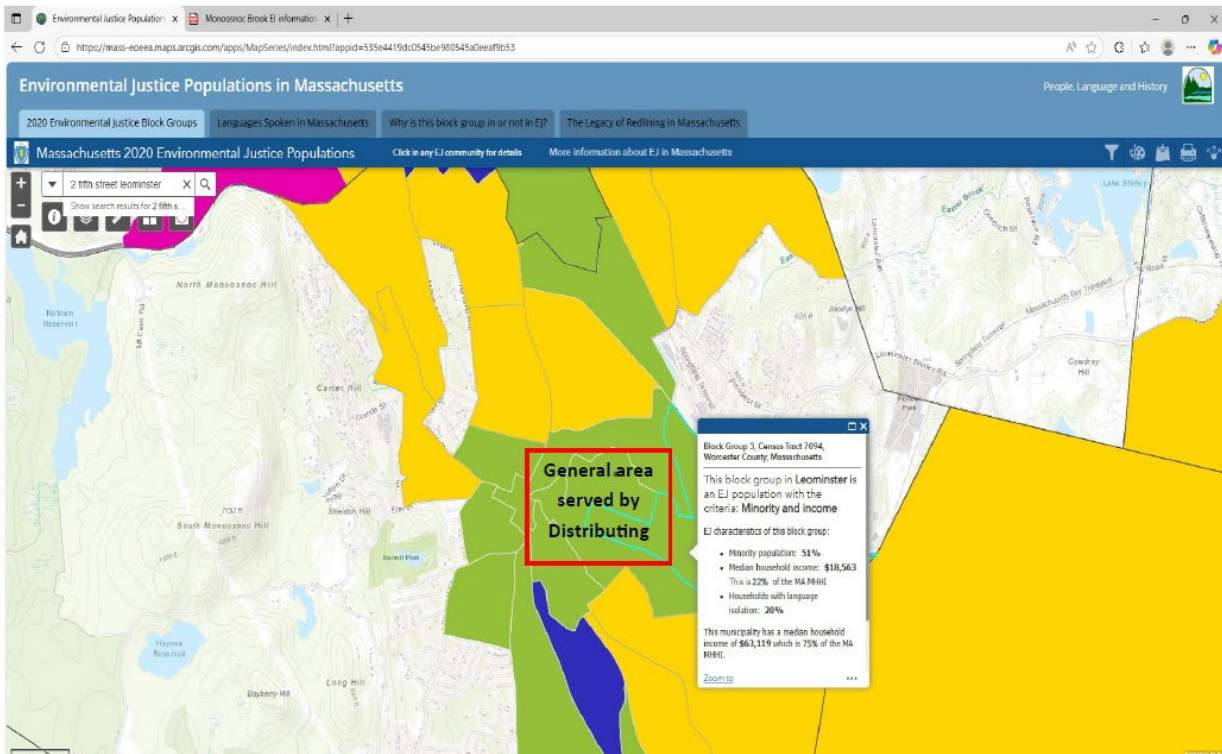
The City of Leominster requested GEI prepare a cost estimate for the construction phase of the Distributing Reservoir Dam Rehabilitation project. The preliminary cost estimate totaled \$5,580,000. Below are some pictures of the damage.



## Distributing Reservoir



## Distributing Dam Project EJ information



# Economic Profile

The City of Leominster is the second largest city in Worcester County. Leominster is located in North Worcester County in Central Massachusetts, forty miles west of Boston. Leominster was home to some of the first production of plastics materials. In recent years, the city welcomed advanced manufacturing including medical devices and advanced polymers. New initiatives to form collaborations between the Center for Technical Education at the high school and the business community are helping to grow this segment of Leominster’s economy.

Leominster has more than 150 manufacturing-related companies. The top 10 largest employers are Market Basket, UMass Memorial HealthAlliance, Georgia Pacific, Hannaford, Life Care Center, New England Wire Products, BJ’s Wholesale, Doubletree by Hilton, Electro-Wire, and Fosta-Tek.

The city has 12 hills and over 3000 acres of open space. Nearly 2/3rds of the Leominster State Forest is in Leominster. In between the uplands and the city’s 160-acre apple orchard, Sholan Farms, lies 26 miles of hiking trails and its drinking water reservoirs. 4.97 miles of State Route 2 and 3.62 miles of I-190 run through the City. Adjacent to those highways and intersecting through the city are the MBTA commuter rail and industrial rail lines. All of this has led to Leominster being the regional hub of retail, industry and tourism.

According to 2019-2023 ACS, 78% of the total civilian non-institutionalized population between the ages of 19-64 are employed, while 5% in that age range are unemployed. 17% of the defined range is not in the labor force.

In looking at the different professional categories as a share of workers aged 16+ most are employed in management, business, science and arts occupations. See chart below for breakdown by occupation categories:

Occupation: Management, business, science, and arts occupations	40%
Occupation: Service occupations	19%
Occupation: Sales and office occupations	19%
Occupation: Natural resources, construction, and maintenance occupations	7%
Occupation: Production, transportation, and material moving occupations	16%
Occupation: Military specific occupations	0%

Source: 2019-2023 ACS

The poverty rate is 10%, which is close to the State-wide average.

According to Leominster, some businesses have experienced staffing problems due to COVID and some of those staffing issues remain.

## Economic Revitalization

### **Exacerbated Pre-Existing needs of Economic Development**

The floods of September, 2023, severely impacted Leominster's Downtown. Particularly with the downtown restaurants, nearly all of their storage was below ground. 33 buildings in the downtown had more than six (6) feet of water in the basement – destroying much of what they had stored. Leominster Credit Union, on the banks of the Monoosnoc, lost its primary branch and its adjacent drive-up facility.

In addition, the restaurants in the immediate downtown had already suffered with reduced parking due to the Monoosnoc Brook situation. In 2017, the east side of the Brook collapsed and temporary measures were put in place. At that time, it was established that the culvert under the parking lot was starting to be compromised and part of the primary parking lot had to be blocked off. That remained that way until the flooding. The flooding occurred in 2023 and further compromised the entire area including Mechanic Street. Since 2023, Mechanic Street has remained partially blocked leading to the additional loss of parking spaces. Currently the Monoosnoc Brook FEMA project is starting and the downtown businesses have lost their primary parking spaces for approximately one year (about 40 spaces). According to Leominster, the City has gone to great lengths to attempt to compensate for the loss of spaces including purchasing shuttles and paying for drivers, adding additional parking spaces where it can throughout the downtown and initiating a media campaign to promote downtown businesses are open during construction.

### **Other Financial Assistance**

During this time, the North Central Massachusetts Chamber of Commerce (NCMCOC) maintained close communication and collaborated with the City of Leominster, providing support to the community in multiple ways. Leominster provided information on community resources through its website and social media channels. North Central Massachusetts Development Corporation, the Chamber's lending arm, adapted the FASTrack Loan Program to offer North Central Flooding Emergency Relief Loans of up to \$10,000 at 1% interest, with up to six months of payment relief. The FASTrack program was offered to help affected small businesses begin remediation and maintain operations during closures while awaiting insurance reimbursements.

Additionally, the SBA was offering the Economic Injury Disaster Loan (EIDL) program to residents and small business owners during this period. NCMCOC hosted SBA representatives

for several weeks, providing a space for office hours. This allowed those interested to meet one-on-one with SBA representatives to learn about the EIDL program and other financing options. Below is a listing of resources available to businesses:

- Loans from the SBA
- Leominster Emergency Management/Leominster Fire Department assisted with immediate needs including pumping out of basements.
- Businesses were encouraged to contact the US Chamber Foundation's Small Business Resilience Hub (not aware of anyone who received help from them)
- MassHIRE Rapid Response Disaster Assistance team provided technical assistance.
- 3 national organizations that respond to disasters provided assistance to homeowners and businesses to assist with clean up, assisting at least 6 businesses that use their services, along with many homeowners.
- The City paid for and opened a cleanup site for businesses and homeowners where people could dump flood damaged items from their homes for several days. This service was popular among City residents.
- The North Central Chamber also set up a hotline to assist businesses.

Leominster was not aware of any direct job losses due to the flood. In terms of actual dollars, there was not much available to businesses and most were advised to file insurance claims with their own insurance company.

An estimated 80% of Leominster businesses had damage from the flood.

### **Remaining Unmet Need**

NCMCOC spoke with many business owners and met with a few; however, most were interested in grants, not loans. They have no records of closing any loans with a Leominster business due to the floods.

Leominster staff report that business owners were immediately expressing interest in grants to replace their equipment and supplies so they could reopen. Ultimately, they believe that businesses pursued loans through their own lending institutions where they may have lines of credit or can easily access capital.

EOHLC does not yet have a signed Computer Matching Agreement ("CMA") with SBA, but will pursue additional data related to Leominster. Once EOHLC receives a CMA from SBA, the information will be incorporated into the plan through a non-substantial amendment.

The high-level assistance information across Bristol and Worcester is as follows – **Offered \$2,201,100, Disbursed \$530,800**

- i. Home Loans – Offered \$1,970,500 (80 applicants), Disbursed \$501,500
- ii. Business Loans – Offered \$185,900 (26 applicants), Disbursed \$29,300
- iii. Economic Injury Loans (EIDL) – Offered \$44,700 (11 applicants), Disbursed \$0

## Mitigation Needs Assessment

A Mitigation Needs Assessment (MNA) looks at the natural threats and hazards in a region to identify how resilience and mitigation measures can be built into recovery programs and projects. The City of Leominster’s Natural Hazard Mitigation Plan was approved by FEMA on March 15, 2023 and is valid through March 14, 2028. EOHLIC is embedding the link to the local Hazard Mitigation Plan within this paragraph, [Leominster Hazard Mitigation Plan](#). The document explains that Leominster is vulnerable to severe weather and riverine flooding within the Nashua River Plateau. The number 1 hazard is flooding: “Although the extent of riverine flooding is limited to the areas along the Nashua River, Monoosnoc Brook, and Fall Brook, it is highly-ranked due to potential for: 1) high economic losses associated with damages to buildings within the floodplain; and 2) impacts to transportation infrastructure. Flooding caused by poor drainage or beaver dams may pose a hazard in other areas not necessarily impacted by riverine flooding.” The following ten Mitigation goals are identified in the Plan:

1. Reduce the loss of life, property, infrastructure, and environmental and other resources from natural disasters.
2. Investigate, design and implement structural projects that will reduce and minimize the risk of flooding.
3. Increase the capacity of local Emergency Managers, DPWs, and Fire, Police and Health Departments to plan for and mitigate natural hazards.
4. Increase public awareness of natural hazard risks and mitigation activities available to them.
5. Improve the quality of the data for the region as it pertains to natural hazards
6. Improve existing local policies, plans, regulations, and practices to reduce or eliminate the impacts of natural hazards.

7. Identify and seek funding for measures to mitigate or eliminate each known significant flood hazard area.
8. Integrate hazard mitigation planning as an integral factor in all relevant municipal departments, committees and boards.
9. Ensure that future development meets federal, state and local standards for preventing and reducing the impacts of natural hazards.
10. Work with surrounding communities, regional, the Commonwealth and federal agencies to ensure regional cooperation and solutions for hazards affecting multiple communities.

Along with the FEMA approved local HMP, this Mitigation Needs Assessment aligns with the Universal Notice and available data to identify priority mitigation strategies.

# Ongoing Analysis of Unmet Need

The Leominster Flood Resilience and Recovery project is designed to identify **near, medium, and long-term solutions** to reduce flood risk and community vulnerability in Leominster, **keeping people and infrastructure safe during the next storm**. This project is led by the Montachusett Regional Planning Commission and funded by the Municipal Vulnerability Preparedness program. They led a listening & learning session that ran through October of 2025. The next phase is co-creating solutions. The project includes a crowdsourced map (in progress) which will enhance the storytelling aspect of this disaster event and potentially identify/clarify unmet need. EOHLIC will consider how findings from this project align with proposed activities. Below is a One-Page visual from this project:

Leominster Flood Resilience and Recovery Project

The Leominster Flood Resilience and Recovery project is designed to identify **near, medium, and long-term solutions** to reduce flood risk and community vulnerability in Leominster, **keeping people and infrastructure safe during the next storm**. This project is led by the Montachusett Regional Planning Commission and funded by the Municipal Vulnerability Preparedness program.



**Listening & Learning**  
July - October

**Co-Creating Solutions**  
November - February

**Recommendations**  
March - June

Engaging the community on climate change impacts and collecting experiences of the 2023 flood.

Using the lived experience of the community, start to identify nature-based solutions and community resilience strategies, and engaging with youth on climate resilience.

Create a set of near, medium, and long-term priorities, strategies, and recommendations on climate resilience and community planning.



### Get Involved

**Apply to be a community liaison!** Community Liaisons connect with community members, understand their priorities, and help make sure that these insights shape the project.

**Add to the crowdsourced map!** Share where you experienced flooding and how it affected your neighborhood.

**Attend an event!** Join us at an upcoming workshop, pop-up, community conversation, or other event.

Scan the QR to View the Map, Add a Point, Add pics and Join the mailing list!











For more information or to get involved, reach out at [flood@mrpc.org](mailto:flood@mrpc.org).

# Connection of proposed programs and projects to the unmet needs and mitigation needs.

In order to make the biggest impact in the high unmet need category of infrastructure, EOHLC is allocating most of the funds for infrastructure projects. Individual Assistance was made available from FEMA within Leominster, while Public Assistance was not provided. Furthermore, some of the top priority infrastructure projects would stand to benefit a high need/lmi area. EOHLC will add any additional data to each of the three categories as it becomes available. There is the option to submit a substantial change to add an activity at a later point if new data/information supports that action. Along with consideration of available resources for the categories of Economic Revitalization and Housing, EOHLC determined that based on the amount of the award, it would be beneficial to the HUD-identified MID area's long-term recovery if the funds were focused on top priority projects in the infrastructure category that have a higher dollar amount and insufficient funding. Furthermore, the consequence to health and safety (particularly for low-and-moderate income persons) of not addressing infrastructure projects is a factor in directing the funding to this category.

The projects will be required to incorporate hazard mitigation measures to reduce the impacts of future disasters and consider all hazard risks, as identified in its mitigation needs assessment.

EOHLC will make all reasonable efforts to minimize displacement of persons or entities, assist any persons or entities displaced, and ensure accessibility needs of displaced persons with disabilities.

## Allocation and Award Caps

The State of Massachusetts will fund an Infrastructure program with most of the CDBG-DR allocation. The national objective will be low-and-moderate income benefit on an area-wide basis. The responsible entity assuming the authority for the decision making and completion of the environmental review per 24 CFR 58.4 will be Leominster. The State of Massachusetts will exercise HUD's environmental review responsibilities and will follow the requirements per 24 CFR 58.4(b)(2) and 24 CFR 58.18.

The geographic area that may benefit from the CDBG-DR funds is the HUD-identified MID area (Leominster). The maximum amount per project for the Infrastructure Program will be \$5,500,000, while the minimum will be \$25,000. The maximum amount per project for the Mitigation Program will be \$1,000,000 while the minimum amount will be \$200,000. EOHLC is

proposing these award amounts at the higher end of each allocation amount for the greatest funding impact.

## Funding Criteria

As EOHLC will be directing funds only to the HUD-identified MID area (not a grantee-identified MID area) these grants will be non-competitive. However, the activities must pass basic eligibility and feasibility standards. EOHLC will open an application in the Spring of 2026 and Leominster will submit infrastructure and mitigation packets either through EOHLC's new IGX grants management system or a designated email inbox. EOHLC will contract with Leominster to carry out activities that will be included in a scope of services.

### CDBG-DR Project Thresholds

All projects proposed must meet the CDBG-DR Project Thresholds established by EOHLC. Compliance with these thresholds is a prerequisite for eligibility and funding consideration.

#### **Project Thresholds for all applications:**

- Valid Authorizing Municipal Official to submit the application
- Adoption of the resolution for grant application authority
- Public Hearing Notice & Hearing
- Project addresses presidentially declared disaster impact(s)
- Project takes place in HUD-Identified MID area(s)
- Activities of the project are eligible per federal register
- Activities of the project meet a National Objective
- Evidence of site control
- Duplication of Benefit and Unmet Needs Statement
- Flood damage affidavit
- Certification and information release form

## CDBG-DR Scoring Matrix – Infrastructure and Mitigation Projects

The applicant will be required to submit a Need narrative for each project which provides a clear description of the current issues or problems to be addressed, the needs/characteristics of

the impacted population and how community-based planning helped to determine the need. The Need narrative should include the expected impact of the project on the defined need. While Need will not be scored, the narrative will help to provide context and background for the proposed project. The Feasibility narrative will be scored. Projects must receive at least half of feasibility points for each question below to be eligible for funding.

### **Project Feasibility and Readiness Scoring (25 pts)**

Demonstrate that the activity proposed is feasible and ready to proceed by providing the following:

1. Describe the present status of the project design and project readiness to proceed. Identify the procurement processes used or applicable to the project. **(10 pts)**
2. Project Budget and Project Oversight – Project budgets and staffing plans will be reviewed to ensure cost reasonableness and adequate management. Provide information to describe how the budget was developed and that the costs are reasonable and the staffing plan for the project is sound. Project staffing and operation structures should provide adequate internal controls, demonstrate ability to ensure compliance with CDBG program requirements, provide for delegation of duties and staff oversight and be reasonable. **(8 pts total: 4 pts budget, 4 pts staffing)**
3. Describe and document the current status of environmental review and the timeline for completion of the process. Identify all necessary federal, state, and local permits, including state and local environmental permits, and the timeframe for obtaining them. Include the appropriate checklist(s). **(3 pts)**
4. List each milestone/action necessary to complete this project. As applicable, describe the milestone/action, provide the month it will be completed, and describe how the milestone/action will be achieved. **(4 pts)**

*\*Project feasibility will be evaluated on the extent to which the project is capable of proceeding at the time of award, can be effectively managed, and can be physically and financially accomplished within the grant period.*

The application/projects will be reviewed and scored by two CDBG Program Representatives and reviewed by the Program Manager.

## **General Exception Criteria**

The State of Massachusetts may make exceptions to award caps when necessary to comply with federal accessibility standards or to accommodate persons with disabilities. In such cases, requests for increases to award caps will be subject to an evaluation based on (a) documented need and (b) cost reasonableness.

## CDBG-DR Allocation Overview

<b>CDBG-DR Allocation Overview:</b>	
<b>Administration</b>	\$397,700 (5% of total allocation)
<b>Infrastructure</b>	\$6,519,300 (82% of total allocation)
<b>CDBG-DR Mitigation Set Aside:</b>	\$1,037,000 (13% of total allocation)
<b>Total Allocation:</b>	\$7,954,000

## Administration

Massachusetts will allocate \$397,700 of the total CDBG-DR award for administrative costs associated with the life of the grant. This represents the maximum amount permissible for administrative costs per the CDBG-DR appropriation language of Public Law 118-158 and HUD's requirements under the Universal Notice.

<b>CDBG-DR Allocation Overview:</b>	
<b>Administration</b>	\$397,700 (5% of total allocation)
<b>Total Allocation:</b>	\$7,954,000

## Infrastructure Programs Overview

The State of Massachusetts proposes implementing an infrastructure program to assist impacted municipalities in addressing remaining unmet needs for bridge, dam and culvert improvements or replacement, water/sewer infrastructure, and road rebuilding or relocation. Within these activities Massachusetts will address several key priorities as stated by HUD in the Universal Notice.

<b>CDBG-DR Allocation Overview:</b>	
<b>Infrastructure</b>	\$6,519,300 (82% of total allocation)
<b>Total Allocation:</b>	\$7,954,000

### **Program Title:** Infrastructure

The State of Massachusetts's Infrastructure Program will provide funding to repair, upgrade, and modernize the State's critical infrastructure in response to damage sustained from DR-4780. The

program aims to reduce the long-term vulnerability of the State’s roads, dams, bridges, stormwater systems, water and wastewater facilities, and other critical infrastructure systems by investing in resilient infrastructure solutions to restore infrastructure damage from DR-4780 and mitigate the impacts of future severe weather events. All projects under this program must demonstrate a tie-back to DR-4780 and unmet needs from the event.

**Eligible Activities:** Acquisition, Construction, Reconstruction, and Installation of Public Facilities and Other Site Improvements and Code Enforcement

**National Objective:** Low- and Moderate-Income (LMI)

**Lead Agency and Distribution Model:**

- The State of Massachusetts’s Executive Office of Housing and Livable Communities will oversee the program and monitor for compliance.
- Distribution process will be through a contract (aka subrecipient agreement) between EOHLC and Leominster to carry out activities in a scope of services; this is the same method used in our MA CDBG program. Grants will be non-competitive; however, the proposed projects must pass eligibility and feasibility requirements.

**Program Description:** Projects may include bridge, dam and culvert improvements or replacement, water/sewer infrastructure, and road rebuilding or relocation.

**Eligible Geographic Areas:** Projects must be in the HUD-Identified MID area. If applicant is using block group information to qualify the project, they must contact the Community Development Program Manager regarding the specific documentation that must be submitted for review.

**Maximum Amount of Assistance Per Beneficiary:** Grants of a minimum of \$25,000 to a maximum of \$5,500,000.

**Maximum Income of Beneficiary:** N/A

**Mitigation Measures:** Applicants must identify specific mitigation actions as part of the basic application and distinct cost breakout in funding request.

**Reducing Barriers for Assistance:** Massachusetts is committed to reducing impediments to assistance wherever possible. Throughout its recovery activities, the State will seek to proactively engage impacted communities to ensure that needs are met.

## CDBG-DR Mitigation Set-Aside Overview

The Universal Notice defines mitigation activities as “activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, and lessening the impact of future disasters.” Activities for mitigation must meet the Universal Notice definition of mitigation activities and, in addition, must:

- Address the current and future risks identified in the local Hazard Mitigation Plan (HMP)
- Be considered CDBG-eligible under Title I of the Housing and Community Development Act (HCDA) or pursuant to a waiver or alternative requirement; and
- Meet a National Objective – Low and Moderate Income or Urgent Need

<b>CDBG-DR Allocation Overview:</b>	
<b>CDBG-DR Mitigation Set Aside:</b>	\$1,037,000 (13% of total allocation)
<b>Total Allocation:</b>	\$7,954,000

**Program Title:** Flood Hazard Mitigation

The State of Massachusetts’s Flood Hazard Mitigation Program will provide funding for activities designed to mitigate the impacts of future floods and other severe weather event-related hazards in HUD-identified MID area. In accordance with Leominster’s Hazard Mitigation Plan, the program will be a targeted effort to increase the resilience of communities and infrastructure along rivers, reduce the long-term risk of loss of life, and lower future impacts to property from severe weather events

**Eligible Activities:** Acquisition, Construction, Reconstruction, and Installation of Public Facilities and Other Site Improvements

**National Objective:** Low- and Moderate-Income (LMI)

**Lead Agency and Distribution Model:**

- The State of Massachusetts’s Executive Office of Housing and Livable Communities will oversee the program and monitor for compliance.
- Distribution process will be through a contract (aka subrecipient agreement) between EOHLC and Leominster to carry out activities in a scope of services; this is the same method used in our MA CDBG program. Grants will be non-competitive; however, the proposed projects must pass eligibility and feasibility requirements.

**Program Description:** Provide funding for floodplain restoration, dam removal, bridge and culvert improvements or replacement, drainage, pump stations, water main improvements, flood storage improvements, and riverbank stabilization to reinforce areas and communities along rivers to mitigate the impacts of future flood and severe weather event hazards

**Eligible Geographic Areas:** Projects must be in the HUD-Identified MID area. If applicant is using block group information to qualify the project, they must contact the Community Development Program Manager regarding the specific documentation that must be submitted for review.

**Maximum Amount of Assistance Per Beneficiary:** Grants of a minimum of \$200,000 to a maximum of \$1,000,000.

**Maximum Income of Beneficiary:** N/A

**Mitigation Measures:** Applicants must identify specific mitigation actions as part of the basic application.

**Reducing Barriers for Assistance:** Massachusetts is committed to reducing impediments to assistance wherever possible. Throughout its recovery activities, the State will seek to proactively engage impacted communities to ensure that needs are met.

## General Information

Grantees must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in notices providing waivers and alternative requirements). Each local government receiving assistance from a state grantee must follow its citizen participation requirements at 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements). The minimum number of public hearings a grantee must convene on the Action Plan to obtain interested parties' views and to respond to comments and questions shall be determined by the amount of the grantee's CDBG-DR allocation; CDBG-DR grantees with allocations under \$20 million are not required to hold a public hearing. EOHLIC is posting this Action Plan for the required 30-day public comment period, and is not required to hold a public hearing because its allocation amount is under the threshold.

## Consultation of Development of the Action Plan

All grantees must consult with states, Indian tribes, local governments, in the surrounding geographic area as applicable during Action Plan preparation to ensure consistency of the Action Plan with applicable regional plans. Grantees must consult with agencies that manage local Continuum of Care<sup>1</sup>, Public Housing Agencies<sup>2</sup>, and HUD-approved housing counseling agencies<sup>3</sup>, as applicable.

Grantees are encouraged to consult with other relevant Federal government partners and local government agencies, including state and local emergency management agencies that have primary responsibility for the administration of FEMA funds, as well as non-governmental organizations supporting community recovery.

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<sup>1</sup> Find local Continuum of Care here: <https://www.hudexchange.info/grantees/>.

<sup>2</sup> Find local Public Housing Agency on HUD's website here: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/pha/contacts](https://www.hud.gov/program_offices/public_indian_housing/pha/contacts).

<sup>3</sup> Find a HUD-approved housing counseling agency on HUD's website here: [https://answers.hud.gov/housingcounseling/s/?language=en\\_US](https://answers.hud.gov/housingcounseling/s/?language=en_US).

Partners Consulted	Describe Consultation
Federal Partners (FEMA, SBA)	Outreach (emails/phone calls) to HUD Regional Representatives, FEMA through the process of data collection, the offices of U.S. Senators Elizabeth Warren and Ed Markey, State Senator John Cronin and State Representative Natalie Higgins and Mayor Dean Mazarrella (Leominster).
Local/State Government	Outreach to Federal, State and municipal stakeholders impacted by DR-4780
Indian Tribes	Correspondence sent to Nipmuc Nation Tribal Council Inc.
Private sector	Outreach to North Central MA Chamber of Commerce
State and local emergency management agencies that have primary responsibility for the administration of FEMA funds	Consultation with MEMA to ensure consistency with applicable regional plans.
Agencies that manage local Continuum of Care	Consultation with Housing Stabilization Managers at EOHLC who are involved with CoC.
Public Housing Agencies	Outreach to Leominster Housing Authority and Public Housing at EOHLC.
HUD-approved housing counseling agencies	Outreach to NewVue CDC
Other Stakeholders	Outreach to Montachusett Regional Planning Commission (MRPC) to ensure consistency with applicable regional plans.

## Public Comments

Prior to submission, the proposed Action Plan and any substantial amendments are published on the State’s official CDBG-DR disaster recovery website for a minimum of 30 days. This period provides an opportunity for residents and community stakeholders to review the draft Action Plan and provide feedback. The draft Action Plan was posted on the Disaster Recovery website on November 26, 2025 with a comment period that ran through December 28, 2025. No comments were received during this time. The action plan was forwarded to Mass Municipal Association for publication in their newsletter, to the MassPlanners

listserv, NewVue Communities, Nipmuc Nation, MEMA and current CDBG grantees through their assigned EOHLC program representatives.

**Comments were to be submitted to the Community Development Manager, Kathryn McNelis, at [kathryn.mcnelis@mass.gov](mailto:kathryn.mcnelis@mass.gov).**

Directly below is the link to the official CDBG-DR Website:

[Community Development Block Grant – Disaster Recovery \(CDBG-DR\) FEMA Disaster #4780 | Mass.gov](#)

## Consideration of Public Comments

Grantees must provide a reasonable time frame (no less than 30 calendar days) and reasonable method(s) (including but not limited to electronic submission) for receiving comments on the Action Plan or substantial amendment. The grantee must consider all oral and written comments on the Action Plan or any substantial amendment. Any updates or changes made to the Action Plan in response to public comments should be clearly identified in the Action Plan. A summary of comments on the Action Plan or amendment, and the grantee’s response to each, must be included with the Action Plan or substantial amendment. Grantee responses shall address the substance of the comment rather than merely acknowledge that the comment was received. Please note that no comments, either oral or written, were received during the public comment period, therefore the chart below is blank.

Comment Received	Grantee’s Response
<i>Add additional rows as needed.</i>	...

## Citizen Complaints

The State of Massachusetts will consider any comments or views of citizens received in writing, or orally at public hearings. The State, through EOHLC, will respond to written complaints related to the Action Plan and any amendments. Where practicable, EOHLC will respond to complaints within 15 working days of receiving the written complaint.

## Modifications to the Action Plan

Over the course of the grant there may be situations that cause grantee to modify the components of this Action Plan to adjust with our evolving disaster recovery needs. Such changes will result in either a substantial amendment or a non-substantial amendment to the Action Plan.

### **Substantial Amendment**

The CDBG-DR Action Plan will be amended as described by the Universal Notice. HUD views the Action Plan as a living document that may be subject to amendments from time to time in response to new information and data that is realized during carrying out a project or become known during the Grant Agreement period. Each Amendment to the Action Plan must be sequentially numbered and the section being amended must be identified in detail of what is being changed, added, or deleted. An amended budget chart must be included that shows how funds are reallocated. The entire Action Plan as amended must be viewable as a single document.

A substantial amendment is defined as:

- a change in program benefit or eligibility;
- a proposed reduction in the overall benefit requirement;
- the allocation or re-allocation of more than 25% of the total allocation;
- the addition or deletion of an activity;
- an update to the submitted initial Action Plan if the original submission was incomplete and one of the above changes is happening in conjunction with the update.

Any substantial amendment must follow the procedure laid out in the CDBG-DR Universal Notice and be authorized by EOHLC. Proposed changes will be made public and posted on the EOHLC CDBG – Disaster Recovery webpage.

EOHLC will receive and consider public comments regarding proposed changes at [kathryn.mcnelis@mass.gov](mailto:kathryn.mcnelis@mass.gov). The public comment period will be available for a minimum of 30 days. EOHLC must receive approval from HUD before implementing any substantial amendments.

### **Non-substantial Amendment**

The State of Massachusetts will make all reasonable efforts to notify HUD before any non-substantial amendment to the Action Plan becomes effective. Any non-substantial amendment will be numbered sequentially and posted on the EOHLC CDBG-Disaster Recovery website. The State is not required to seek public comment.

### **Performance Reports**

EOHLC will enter performance report information into the HUD Disaster Recovery Grant Reporting (DRGR) System Quarterly of each of the Projects funded under the approved Action Plan in accordance with the requirements of HUD. The Quarterly performance report will be available for review no later than seven calendar days after the HUD CPD staff member approves the report in the DRGR.

If HUD CPD rejects Quarterly report, the State must make revisions within 30 calendar days and resubmit the report in the DRGR.

# Appendix

## 6.1 Certifications, Waiver, and Alternative Requirements

The State of Massachusetts EOHLIC, as grantee, makes the following certifications with its action plan:

a) **Uniform Relocation Act and Residential Anti-displacement and Relocation Plan** – EOHLIC certifies that it:

(1) will comply with the acquisition and relocation requirements of the Uniform Act, and implement regulations at 49 CFR 24, as such requirements may be modified by waivers or alternative requirements;

(2) has in effect and is following a RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR 42, and 24 CFR 570, as amended by waivers and alternative requirements.

b) **Authority of Grantee** - EOHLIC certifies that the Action Plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.

c) **Consistency with the Action Plan** - EOHLIC certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.

d) **Citizen Participation** - EOHLIC certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).

e) **Consultation with Local Governments** - EOHLIC certifies that it has consulted with all disaster-affected local governments (including any CDBG-entitlement grantees), Indian tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state.

f) **Use of Funds** - EOHLIC certifies that it is complying with each of the following criteria:

(1) Purpose of the funding. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization,

and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 et seq.).

(2) **Maximum Feasibility Priority.** With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.

(3) **Overall benefit.** The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.

(4) **Special Assessment.** EOHLC will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

g) **Grant Timeliness** - EOHLC certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.

h) **Order of Assistance** - EOHLC certifies that it will comply with the statutory order of assistance listed at Appendix C paragraph 9 and will verify if FEMA or USACE funds are available for an activity, or the costs are reimbursable by FEMA or USACE before awarding CDBG-DR assistance for the costs of carrying out the same activity.

i) Further, as required by Paragraph 64 of HUD's March 19, 2025, memorandum revising Appendix B of HUD's Universal Notice issued on January 8, 2025, EOHLC hereby provides assurance that it shall comply with the following certifications:

a. General Certifications at 24 CFR 91.325(a)(1), (3), and (7)

b. Community Development Block Grant Program Certifications at 24 CFR 91.325(b)(5), (6), and (7).