

# Rural and Small Town Development Fund Grant Program

## Program Information and Guidelines FY2023

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#### Commonwealth of Massachusetts

Charles D. Baker, Governor | Karyn E. Polito, Lt. Governor | Mike Kennealy, Secretary

#### Rural and Small Town Development Fund Grant Program FY 2023

#### Introduction

The Baker-Polito administration is pleased to provide a grant program to provide communities funding for projects in Rural and Small Towns -- towns with populations less than 7,000 or with a population density of less than 500 persons per square mile (measured by the 2020 US Census).

Rural and Small Town grants may be used for a variety of activities that support economic development, job creation and housing and climate resilience initiatives in small towns or rural areas of the commonwealth. Activities may include capital projects such as construction, modernization, or major repair of physical infrastructure, acquisition of property or interests in property; long-lived equipment; feasibility, engineering or schematic designs for capital projects. Planning and zoning projects may also be funded by this program. For FY23, approximately \$3 Million is available in grants.

Grants in this category will likely be \$25,000-\$400,000.

Examples of these projects include:

- Rehabilitation of housing in a rural community to bring an underutilized property back onto the market.
- Design or construction of a new water line connection to an adjacent town or making plans to consolidate water districts for an area served only by wells.
- Physical infrastructure improvements to increase safety and mobility between residential and commercial areas that increases and promotes alternative modes of transportation.
- Address town infrastructure through public building improvements that addresses a local need.
- Create a housing production plan to better understand housing needs of the community and identify strategies to reduce gaps in existing housing relative to identified needs.
- Create a multi-family zoning district near a transit station to comply with M.G.L. Chapter 40A, Section 3A "draft guidelines".
- Review zoning ordinances and create a plan to update zoning rules to unlock potential housing production and economic development growth.

#### **Eligibility and Criteria**

<u>Eligible Applicants</u>: Massachusetts' municipalities with a population of 7,000 or less as of the 2020 US Census or towns with less than 500 persons per square mile, and related service districts or redevelopment authorities. (See Appendix 2 for a list of qualifying municipalities)

**Use of Funds:** Funding is available through "Planning and Zoning," "Site Preparation," "Buildings (vertical)," and "Infrastructure (horizontal)" categories of the One Stop development continuum Grants will fund capital projects such as construction, modernization, or major repair of physical infrastructure, acquisition of property or interests in property; long-lived equipment; feasibility, engineering or schematic designs for capital projects. Funding may also be used for planning and zoning projects for a variety of activities related to land use, such as the development of a Master Plan, Housing Production Plan, Zoning revisions including for MBTA Communities seeking to comply with "draft guidelines" for M.G.L. Chapter 40A, Section 3A, Urban Renewal Plan, Land Use Plan, Downtown Plan, Parking Management Plan, District Improvement Financing (DIF) Plan, Municipal Surplus Property Disposition Plan, or Other Strategic Plan.

<u>Timing</u>: FY23 grants are expected to be awarded in the fall of 2022 and **must be completed by** June 30, 2024.

**Maximum Award Amount:** \$400,000 is the maximum grant award for projects that fall under the site preparation, building, or infrastructure One Stop development continuum categories. Projects that fall under the planning and zoning One Stop development continuum category will be typically capped at \$75,000 and may exceed that amount only if proof of need demonstrates the need for additional funding. DHCD reserves the right to reduce the amount of the award from the original request, and to deny award to communities who owe funds to DHCD. Funding availability is subject to approval of state budgets.

#### **Community One Stop for Growth Application**

The Community One Stop for Growth is a single online application portal designed to allow applicants to apply for consideration of multiple sources of funding to support multiple phases and facets of a project. To help guide applicants, the One Stop uses a Development Continuum or lifecycle that describes how a typical economic development project moves from concept to reality within diverse communities. The One Stop encourages applicants to think about their economic development priorities in the context of the Development Continuum, both to guide applicants towards best practices and strategies and to help applicants identify the types of projects that will help achieve their economic development priorities. Applicants should consider this spectrum of activities as it prepares to submit applications to the One Stop, thinking fully about the steps necessary for progress in the development of a project.



<u>Programs</u>	Community Capacity Building	Planning & Zoning	Site Preparation	Buildings (vertical)	Infrastructure (horizontal)
<b>Commonwealth Places</b>	$\checkmark$				
Urban Agenda	✓				
Mass Downtown	✓	$\checkmark$			
Real Estate Services	✓	✓			
Community Planning		$\checkmark$			
Brownfields			$\checkmark$		
Site Readiness			$\checkmark$		
Collaborative Workspace				✓	
Under Utilized Properties				✓	
MassWorks					$\checkmark$
Housing Choice		✓			✓
Rural Development		✓	✓	✓	$\checkmark$

Figure 1: One Stop for Growth Development Continuum.

The application is organized into the following sections:

- Core Questions (Sections 1 and 2), plus site information, if applicable,
- Additional Questions (Sections 3 through 7), based on the development continuum and the project components selected by the applicant,
- Additional Questions for Housing Choice Communities (Sections 8), only for communities designated as Housing Choice,
- Certification of Application Submission Authority (Section 9),
- Other Attachments (Section 10), for attachments related to special projects.

A full proposal packet for consideration of Rural and Small Town funding must include complete responses to all applicable questions in the following sections:

Core Questions (Sections 1 and 2), plus site information, if applicable,

- Section 1 <u>Applicant Information/Background</u>: Identifying information of the applicant, and partners, if applicable.
- Section 2 <u>Project Information</u>: In this section, applicants will provide general project information, such as the project name, description, leadership and the ability to execute the project, timeline and anticipated outcomes. Applicant will indicate the category of funding for which they would like the project to be considered in question 2.1, which

will drive additional questions. Those applying to the Site Preparation, Buildings and Infrastructure categories must complete the Site Information questions, which include identification of the specific site, ownership, and zoning.

Additional Questions (Sections 3 through 8), based on the development continuum and the project components selected by the applicant in Section 2, Question 2.1,

- Section 4 <u>Planning and Zoning Additional Questions</u>: This section is where applicants will provide detail about the proposed planning project, outcomes, leadership and implementation.
- Section 5 <u>Site Preparation Additional Questions</u>: This section is where applicants will provide detail about the specific project site for which funding is requested. Includes detailed scope(s) of work, site details, historic environmental reports, and budget. Additional questions are required for Brownfields related applications.
- Section 6 <u>Building Additional Questions</u>: This section is where applicants will provide detail about the specific capital building project for which funding is requested. Includes detailed scope(s) of work, public purpose, details about the property, planned use, and budget.
- Section 7 <u>Infrastructure (Horizontal Construction) Additional Questions</u>: This section is where applicants will provide detail about the specific public infrastructure project for which funding is requested. Includes detailed scope(s) of work, budget, design and permitting status, and for non-Small Town Road Assistance Program (STRAP) requests, questions about the specific private development being leveraged.

#### Certification of Application Submission Authority (Section 9),

• Section 9 - <u>Certification of Application Submission Authority</u>: Signature page certifying the authority to submit the application on behalf of the applying entity and attesting that all responses are true and accurate.

#### Other/Optional Attachments (Section 10),

• Section 10 - <u>Other/Optional Attachments</u>: This section allows submit other attachments to support the application, including other site images, partner letters or support letters. Please note that these items will generally not be scored or assessed as part of the formal evaluation of the proposal.

**IMPORTANT:** The sections outlined above relate only to the Rural and Small Town Development Fund category. Applicants may be required to complete other sections of the Community One Stop application, depending on the other categories they may have selected. Please review the instructions for the One Stop carefully.

- All applications must be submitted electronically. The online application portal, *IGX*, can be accessed at <a href="https://eohed.intelligrants.com">https://eohed.intelligrants.com</a>. An online webinar outlining the use of the system will be available on the site. (*See Appendix 3 for additional guidance on accessing online application*.)
- The application form template and link to the portal will also be available on the EOHED webpage. Applicants will have at least 12 weeks to review the application questions and prepare their project proposal.
- Eligible applicants may submit funding requests for more than one project in the same round. However, a separate application, and completed Section 11, is required for each project. Each proposal will be evaluated independently against the criteria and will be competing directly with all other proposals.
- It is the responsibility of the applicant to be aware of all requirements and deadlines, and to ensure that their application is complete and submitted on time. All applications will be logged as to date and time received and kept on file as public record. Late submissions will not be considered.
- DHCD reserves the right to solicit additional information from applicants in order to confirm or clarify factual or procedural responses to application requirements such as copies of legal advertisements, minutes, survey instruments, letters, etc. Acceptance of these materials is subject to DHCD's satisfaction that the omitted material was in existence at the time of application and submission of the requested documents is made within a specified timeframe.



As part of the One Stop for Growth Continuum <u>(see figure 1 above)</u>, if your community is designated as a Housing Choice Community, you are eligible to apply for consideration by that grant program. If you choose to do so, please review the Housing Choice Grant Program guidelines.

#### Rural and Small Town Evaluation Criteria

Grant proposals will be scored for the responsiveness to the following criteria. See Appendix 1 for full Evaluation Criteria and Scoring:

- **Project Need:** What community needs are met by the project? Preference will be given to projects that lead to or support housing production; create economic development; respond to COVID-19 related need; respond to clearly defined local priority; address a need identified in another community based or identified plan; address local transportation needs; address local infrastructure needs; lead to, support, or aim to identify other needs.
- **Project Readiness:** Is the project reasonable and achievable within proposed timeline; led by appropriate leadership with the requisite experience and ability to execute the project; ready to implement or be executed; feasible and achievable?
- **Project Financial Feasibility:** Is the project's budget reasonable? Preference will be given to projects that leverage funding outside of the requested grant funds but is not

required. Projects with a cash match over 10% will receive special consideration. In-kind contributions are not match eligible.

- **Progress & Commitment to Date:** Does the applicant show commitment to the project through past activity and investment?
- **Project Outcomes & Impact:** What are the projected outcomes of this project and the impact this project may have on the community? How is equity included in your project? (See appendix 4 for equity information and definitions)
- **Rural and Small Town Bonus Points:** The <u>2019 Rural Policy Plan for the Commonwealth</u> <u>of Massachusetts, prepared by the Rural Policy Advisory Commission</u> identified several core strategies pertinent to this grant program. Scoring will be based on how well the project achieves or implements each relevant strategy.

#### Grant Award Process

<u>Contract with DHCD and Award of Funds</u>: Successful applicants must be ready to enter into a contract with DHCD within 30 days after receiving contract documents. Funding is subject to approval of the DHCD operating and capital budgets. Grant projects will begin upon the execution of the contract. If selected, the grantee will be required to submit the following forms to complete a contract:

- Commonwealth Standard Contract Form, filled out and signed by the Respondent.
- Commonwealth Scope and Budget Form (available from DHCD).
- Completed Contractor Authorized Signature Verification Form.

<u>Grant Distribution and Invoicing</u>: Granted funds will be disbursed on a reimbursement basis. Only work completed during the period of the executed contract will be eligible for reimbursement. Upon receipt of all required deliverables the community will be reimbursed for the balance of any outstanding grant funds.

#### **APPENDIX 1: RURAL AND SMALL TOWN EVALUATION CRITERIA AND SCORING**

Applications to the Rural and Small Town grant program will be eligible to receive a **maximum** of **150** points through a panel review process.

#### Core Rural and Small Town Scoring Criteria (maximum 120 points)

#### Project Need (maximum total 30 points)

Project need is scored based on demonstration of one or more of the following:

- Project responds to recent 40A reforms (MBTA Communities or simple majority zoning votes), results in net new increase in housing units, directly supports an approved housing project, or one built within the last 5 years, or ADA accessibility for housing and/or clearly relates to a COVID-19 capital need. **(25 points)**
- Project responds to pressing local priorities that address a need from COVID-19, or is included in or related to an adopted capital improvements plan, capital expenditures plan or ADA self-evaluation and transition plan or project included in strategic plan (housing, economic development, local transportation options) or other adopted method of identifying the particular project as a priority for the applicant community. (20 Points)
- Project responds to other municipally identified and <u>documented</u> need supporting housing, economic development, or local transportation options. **(15 points)**
- Project responds to other municipally identified need supporting housing, economic development, or local transportation options. **(10 points)**
- **BONUS:** The community does not have a full-time planner/project related municipal staff and requires consultant/non-municipal staff assistance to complete this project and unlock further housing or economic development potential. **(5 Points)**

#### Project Readiness (maximum total 20 points):

Readiness will be scored based on demonstration of the following:

- Scope and Timeline:
  - Project scope and timeline are feasible and within the grant timeline. (5 points)
  - Project may face scope and timeline challenges. (3 points)
  - Project is not achievable within proposed timeline or goes beyond allowed timeline. **(0 points)**
- Leadership:
  - Project leadership has requisite experience and ability to execute the project. (5 points)
  - Project leadership has some experience to lead the project. (3 points)
  - Project leadership has little to no experience leading a similar project. (0 points)
- Timely project implementation:
  - Project is ready to start and has identified a consultant that provided a cost estimate. **(5 points)**
  - Project is ready to release an RFP upon award. (3 points)
  - Project is not ready to bid upon award. (0 points)

#### • Construction readiness (*for site preparation, building, and infrastructure only*):

- Project is eligible for feasibility, design and/or engineering, or construction services by a contractor already under contract with the applicant. (5 points)
- Project can start within 2 months of award using established purchasing consortia, municipal material and equipment bid results or other immediately available sources for capital items and the project has complete design and/or specifications and will proceed to bid upon grant award. (3 points)
- Project is not ready to commence as steps outside of the scope of this project are needed to be completed prior to start. **(0 points)**
- Community engagement (*for planning and zoning only*):
  - Project includes a comprehensive public engagement plan. (5 points)
  - Project includes a limited public engagement plan. (3 points)
  - Project is missing a public engagement plan. (0 points)

#### Project Financial Feasibility (maximum 20 points):

Financial Feasibility will be scored based on demonstration of one or more of the following:

- The project request fully funds the project or fills the last funding gap in an otherwise fully funded project (15 points)
- Project request includes a draft warrant article or other recommended community funds request to pursue remaining funding with a funding award schedule that allows for project completion by grant deadline. **(10 points)**
- The project requests a portion of the funds necessary to complete the project and evidence of other grant applications and potential award schedule is provided (5 points)
- **BONUS:** The project includes more than 10% local funding match. Note that only cash counts as a match, staff time does not count as a match. **(5 points)**

#### Progress & Commitment to Date (maximum 15 points):

Commitment to Date will be scored based on demonstration of one or more of the following:

- Project is the result of either another previously identified planning document or community-based initiative that accomplishes a previously set community goal or is an update to a previously completed project that has met some or all its goals. **(15 Points)**
- Project responds to a community need that requires further evaluation and planning. (10 Points)
- Project is a new community, housing, or economic development tool being used by the community. (5 points)

#### Project Outcomes & Impact (maximum 35 points):

Outcomes & Impact will be scored based on demonstration of one or more of the following:

- Project will result in or directly support increased housing production, economic development, or infrastructure improvements that allow for housing, economic development, or transportation improvements including multi-modal access. (15 Points)
- Project will affect a single property or site. (10 Points)

- Project will not result in clear and direct improvement to increased housing production, economic development, infrastructure improvements, parking, transportation, or multimodal access but will improve the quality of life and wellbeing of current residents. (5 Points)
- **BONUS:** Project will develop materials for compliance with M.G.L. Chapter 40A, Section 3A "draft guidelines". **(10 Points)**
- **BONUS:** Project demonstrates a strong equity focus and addresses the Sustainable Development Principle to "Advance Equity." (5 Points)
- **BONUS:** Project will impact at least 1 census block group of an Environmental Justice Population in Massachusetts. **(5 Points)**

#### Rural and Small Town Bonus Point Scoring Criteria (maximum 30 points)

#### Rural Policy Plan Core Strategies (maximum 30 points):

The <u>2019 Rural Policy Plan for the Commonwealth of Massachusetts, prepared by the Rural</u> <u>Policy Advisory Commission</u> identified several core strategies pertinent to this grant program. Criteria below will be scored based on how well the project achieves or implements the strategy up to 10 points in total each.

#### **Core Strategies For Rural Communities:**

- Project will develop municipal capacity and incentives for service sharing and involve more than one community allowing for shared services and peer to peer learning opportunities. (up to 10 points)
- Project will directly relate to water and sewer infrastructure and to the design, enhancement or provision of water and sanitary sewer infrastructure. (up to 10 points)
- Project will develop or implement targeted economic development strategies for rural sectors and small towns and support economic development specific to rural communities and small towns. (up to 10 points)

#### **APPENDIX 2: RURAL AND SMALL TOWNS DESIGNATIONS**

The following 181 towns are eligible to apply for the Rural and Small Town grant program:

1. Adams	33. Chilmark	65. Harvard
2. Alford	34. Clarksburg	66. Hatfield
3. Aquinnah	<b>35.</b> Colrain	67. Hawley
4. Ashburnham	<b>36.</b> Conway	<b>68.</b> Heath
5. Ashby	<b>37.</b> Cummington	69. Hinsdale
6. Ashfield	<b>38.</b> Dalton	70. Holland
7. Athol	<b>39.</b> Deerfield	71. Hopedale
8. Avon	40. Dighton	72. Hubbards
9. Barre	41. Douglas	73. Huntingto
10. Becket	<b>42.</b> Dover	74. Ipswich
11. Belchertown	43. Dunstable	75. Lakeville
12. Berkley	44. East Brookfield	76. Lancaster
13. Berlin	<b>45.</b> Eastham	77. Lanesbor
14. Bernardston	46. Edgartown	<b>78.</b> Lee
15. Blandford	47. Egremont	79. Leicester
16. Bolton	48. Erving	<b>80.</b> Lenox
17. Bourne	<b>49.</b> Essex	81. Leverett
18. Boxborough	50. Florida	82. Leyden
19. Boxford	51. Freetown	83. Lincoln
20. Boylston	<b>52.</b> Gill	84. Lunenbur
21. Brewster	<b>53.</b> Goshen	85. Manches
22. Brimfield	54. Gosnold	86. Marion
23. Brookfield	55. Granby	87. Mattapoi
24. Buckland	56. Granville	88. Mendon
25. Carlisle	57. Great Barrington	89. Merrimad
26. Carver	<b>58.</b> Groton	90. Middlebo
27. Charlemont	59. Groveland	91. Middlefie
28. Charlton	60. Hadley	92. Millville
<b>29.</b> Chatham	61. Halifax	93. Monroe
<b>30.</b> Cheshire	62. Hampden	94. Monson
<b>31.</b> Chester	63. Hancock	95. Montagu
32. Chesterfield	64. Hardwick	96. Monterey

67.	Hawley
68.	Heath
69.	Hinsdale
70.	Holland
71.	Hopedale
72.	Hubbardston
73.	Huntington
74.	Ipswich
75.	Lakeville
76.	Lancaster
77.	Lanesborough
78.	Lee
79.	Leicester
80.	Lenox
81.	Leverett
82.	Leyden
83.	Lincoln
84.	Lunenburg
85.	Manchester-By-The-Sea
86.	Marion
87.	Mattapoisett
88.	Mendon
89.	Merrimac
90.	Middleborough
91.	Middlefield
92.	Millville
93.	Monroe
94.	Monson
95.	Montague
96.	Monterey

97. Montgomery			
<b>98.</b> N	Iount Washington		
<b>99.</b> N	<b>99.</b> Nahant		
100.	Nantucket		
101.	New Ashford		
102.	New Braintree		
103.	New Marlborough		
104.	New Salem		
105.	Newbury		
106.	North Brookfield		
107.	Northfield		
108.	Oak Bluffs		
109.	Oakham		
110.	Orange		
111.	Orleans		
112.	Otis		
113.	Oxford		
114.	Palmer		
115.	Paxton		
116.	Pelham		
117.	Pepperell		
118.	Peru		
119.	Petersham		
120.	Phillipston		
121.	Plainfield		
122.	Plympton		
123.	Princeton		
124.	Provincetown		
125.	Rehoboth		

126.	Richmond
127.	Rochester
128.	Rockport
129.	Rowe
130.	Rowley
131.	Royalston
132.	Russell
133.	Rutland
134.	Sandisfield
135.	Sandwich
136.	Savoy
137.	Sheffield
138.	Shelburne
139.	Sherborn
140.	Shirley
141.	Shutesbury
142.	Southampton
143.	Southwick
144.	Spencer
145.	Sterling
146.	Stockbridge
147.	Stow
148.	Sturbridge
149.	Sunderland
150.	Sutton
151.	Templeton
152.	Tisbury
153.	Tolland
154.	Topsfield

155.	Townsend
156.	Truro
157.	Tyringham
158.	Upton
159.	Uxbridge
160.	Wales
161.	Ware
162.	Warren
163.	Warwick
164.	Washington
165.	Wellfleet
166.	Wendell
167.	Wenham
168.	West Bridgewater
169.	West Brookfield
170.	West Newbury
171.	West Stockbridge
172.	West Tisbury
173.	Westhampton
174.	Westminster
175.	Westport
176.	Whately
177.	Williamsburg
178.	Williamstown
179.	Winchendon
180.	Windsor
181.	Worthington

#### **APPENDIX 3: ACCESSING THE ONLINE APPLICATION**

All applications to the Housing Choice Communities Capital Grant Program must be submitted electronically through the **Community One Stop for Growth application process**. The application will be available and accepted through the IGX Platform, which is the upgraded version of IntelliGrants. The system can be accessed at <u>https://eohed.intelligrants.com</u>. A user account is required. Below are the steps for getting into the system. **This is the same system that the MassWorks grant program has used since 2018**.

The municipality should activate a primary account with the municipal CEO and/or designee(s) as a "Grant Administrator". This person(s) can then add other users, as necessary. Please refer to the IGX Grantee User Manual for technical instructions.

**Current Admin Users** – Municipal CEOs and/or designees who have used the IntelliGrants system in past rounds may be able to use their existing usernames to access the new application as a Grant Administrator in the IGX system. However, you must use the "Forgot Username/Password" function to reset your password when you first login and/or if you do not remember your username.

**New Admin Users** – If your community, or public entity, has not accessed the system in the past, a new registration is required. Similarly, this should be done by the municipal CEO and/or a designee. Click the "New User? Register Here" link to complete and submit a registration request. When that account is approved by EOHED, an email notification will be sent from the system confirming designation as a Grant Administrator. **NOTE:** All new requests for Grant Administrator must be approved by EOHED. These will be reviewed as they are received. Applicants will get an email notification from the system confirming the approval. If confirmation not received after 48 hours, please contact <u>onestop@mass.gov</u> to request assistance.

**Other Users** – Once a Grant Administrator is established for your organization, that user(s) may then create and/or approve additional accounts for municipal staff and/or consultants, such as grant writers, engineers, etc. Requests for access to IGX should be made directly to your community's Grant Administrator. **Starting an application** – Once accounts are registered and/or approved, a Grant Administrator will be able to start an application(s), from the "My Opportunities" panel, and following the prompts in the portal. Any designated user may access, edit, and/or save an application on behalf of their organization, and are encouraged to save their work often, particularly after completing each section. However, only a Grant Administrator will be able to formally submit the application(s).

**Submitting an application** – Applications may be edited in IGX at any time up until the deadline. Official submissions to the Community One Stop for Growth will only be accepted during the posted dates. During that timeframe, the "Application Submitted" option will become available (**to Grant Administrators only**), to officially submit an application. Applicants will receive an email confirming receipt within 24 hours. If an email is not received after 24 hours, please contact onestop@mass.gov for assistance.

**NOTE:** If an application is erroneously submitted prior to being finished, the applicant may contact EOHED to reopen the application for further editing and completion, as long as it is before the deadline. Staff will try to accommodate these requests as they are received but may not be able to respond to all requests immediately. DHCD is not responsible for delays or missed deadlines due to applicant errors.

#### **APPENDIX 4: EQUITY IN RURAL AND SMALL TOWN GRANT PROGRAM**

#### Sustainable Development Principle: Advance Equity

The Commonwealth's <u>Sustainable Development Principles</u> define advancing equity as:

<u>Advance Equity</u>: Promote equitable sharing of the benefits and burdens of development. Provide technical and strategic support for inclusive community planning and decision making to ensure social, economic, and environmental justice. Ensure that the interests of future generations are not compromised by today's decisions.

#### **Environmental Justice Population**

The Commonwealth defines a neighborhood as an <u>Environmental Justice Population</u> if one or more of the following four criteria are true:

- **1.** the annual median household income is not more than 65 per cent of the statewide annual median household income;
- 2. minorities comprise 40 per cent or more of the population;
- 3. 25 per cent or more of households lack English language proficiency; or
- 4. minorities comprise 25 per cent or more of the population and the annual median household income of the municipality in which the neighborhood is located does not exceed 150 per cent of the statewide annual median household income.

To assess whether at least 1 census tract in your project area is an EJ community you may use the following map and community list:

- Environmental Justice Map Viewer
- List of Massachusetts Cities & Towns with Environmental Justice Populations