

Sent: Friday, September 15, 2023 8:59 PM
Subject: IDA and SBA results for August storm

Good afternoon.

I apologize for the Friday night email but I wanted to get this out to you all as soon as I could.

Thank you for your collaboration and patience as we evaluated the damage caused by the rainstorms in August in northeastern Massachusetts. After collecting and reviewing all submitted damage assessment data, MEMA has determined that the Commonwealth of Massachusetts does not meet the minimum criteria to pursue a federal major disaster declaration for the August 8th rainstorms. As you know, these criteria (including damage thresholds) are set by the federal government, not MEMA or the Commonwealth. Unfortunately, the August 8th rainstorms did not meet the criteria for a federal major disaster declaration.

As discussed previously, to obtain a federal major disaster declaration, the situation must be of such severity and magnitude that effective response is beyond the capabilities of the State and affected local government. In making this determination, FEMA will consider all the following factors:

1. The amount and type of damages;
2. Estimated cost of assistance (using the established reimbursable cost thresholds);
3. Localized impacts;
4. The available resources of the state and local governments and other disaster relief organizations;
5. Insurance coverage in force (consideration of amount of insurance coverage that is in force or should have been in force as required by law and regulation);
6. Imminent threats to public health and safety;
7. Recent multiple *disasters* in the State (disaster history within the last 12-month period as well as declarations by the Governor and the extent to which the State has spent its own funds);
8. Hazard mitigation (extent to which State and local government measures contributed to the reduction of disaster damages, especially implementation of measures required as a result of previous major disaster declarations);
9. Assistance available from other Federal program and other sources; and
10. Other factors pertinent to a given incident.

Based on these criteria, MEMA evaluated the potential for a federal declaration based on the following factors:

Reimbursable damage thresholds are not met. The threshold is not simply the total of the costs or value of everything damaged and all monies spent on response. Only certain FEMA-reimbursable cost categories can be included in the damage estimates to meet thresholds. For example, items such as, private property damage, unimproved roads for which a city or town

cannot prove maintenance, federally-owned or funded roads, engineering costs, mitigation measures, and damages coverable by property insurance, among other things, cannot be included as costs for the purpose of meeting the threshold for a major disaster declaration under the Stafford Act. Based upon the information submitted to MEMA by the impacted cities and towns, the total reported damage estimates fell below the state threshold and below the county thresholds for Middlesex and Norfolk counties. See table below:

COUNTY	AMT. REPORTED	THRESHOLD	AMT. SHORT
Essex	\$6,280,481.37	\$3,595,640.76	(\$2,684,840.61)
Middlesex	\$571,178.27	\$7,246,088.88	\$6,674,910.61
Norfolk	\$1,551,500.00	\$3,223,355.64	\$1,671,855.64
Plymouth	\$387,867.97	\$2,356,836.36	\$1,968,968.39
Total Reported			\$8,791,028
State Reimbursable Damage Threshold			\$12,442,953

As you can see, total reimbursable costs estimates were well below the reimbursable damages threshold and that amount would only decrease further during FEMA’s preliminary damage assessment process.

The storms did not exceed the capability of both the state and local governments to respond, which is a prerequisite for a federal major disaster declaration. Specifically, we do not believe that we will meet the criteria for this storm because:

11. There was not a need to declare a state of emergency to provide resources and assistance or coordinate a state-level response;
12. There was a single request for assistance (sandbags requested by Billerica and provided by Groton);
13. There was not a need to activate the state emergency operations center to coordinate response; and
14. The state’s reimbursable damages threshold was not met for the storm.

SBA Disaster Programs outcomes

MEMA worked with the Small Business Administration (SBA) to facilitate the SBA’s ground survey of damages for eligibility under an SBA Administrative (Agency) Declaration. This assessment was conducted by the SBA on September 6 and 7. Essex County met the SBA’s criteria for an Administrative declaration, which will make both physical damage loans and Economic Injury Disaster Loans available to individuals, households, and businesses within that county. The contiguous counties of Middlesex and Suffolk will also be eligible to participate in any SBA programs. Norfolk County did not have significant enough impacts to meet the SBA’s criteria.

To qualify or “meet criteria,” the SBA Survey must demonstrate 25 homes and/or businesses with uninsured losses of 40 percent or more of their estimated fair replacement value. Sites for evaluation during the ground survey were identified using Initial Damage Assessment forms submitted by each community.

The SBA began surveys on Wednesday (9/6) in North Andover (Essex County) where the bulk of the locations that met the criteria were identified. The SBA continued to Haverhill where they were able to survey enough viable locations to push Essex County over the required 25 locations that met the criteria for SBA’s program. SBA then moved on to Billerica to survey locations for Middlesex County. While Billerica submitted damage assessments for 128 locations, the SBA survey representative only identified 18 locations had potential to meet the criteria. One location was an apartment complex with 47 units but none of the units met the criteria. Middlesex did not have the damage to meet the criteria to be a primary county. On Thursday, September 7th, the SBA surveyed 43 locations in Needham, but only 16 met the criteria for SBA’s program.

MEMA and the Commonwealth took the necessary steps in this process including working to identify a location community for the SBA Disaster Loan Outreach Center. In addition, Governor Healey signed the request letter` and MEMA will forward that immediately to the SBA.

Crisis Cleanup

MEMA activated the Crisis Cleanup program to connect homeowners with assistance for clean up after the flooding. Across the impact area, 74 homeowners requested assistance in Andover, Boxford, Haverhill, Lawrence, Mattapoisett, Needham, North Andover, North Reading, and Tewksbury.

We remain committed to partnering with our emergency management agencies, municipal and legislative officials, small businesses, and other relevant stakeholders for response and recovery. If you have additional questions or concerns, I am available for a call or meeting.

Respectfully,

Dawn Brantley, JD, CEM, ADAC
Director
Massachusetts Emergency Management Agency
Preferred pronouns: she, her, hers