

APA14 Public Comments

Preface

Public comments related to the substantial amendment of the Community Development Block Grant - Disaster Recovery (**CDBG-DR**) Action Plan were received in English and in Spanish. All comments, in their entirety and in the language and format in which they were submitted, are available at <https://recuperacion.pr.gov/> and in Appendix A of the Action Plan.

For the benefit of the reader, the comments submitted have been summarized in this document in Spanish and English. The comments cited may be paraphrased as a result of the translation process or for conciseness. Personally identifiable information has been removed from the comments to protect the commenter's privacy. Please refer to the text of the comments submitted for additional information.

You may contact the Puerto Rico Department of Housing (**PRDOH**) to request the complete translation of any comment or the alternative means of access or formats to obtain access to the public comments and the responses from PRDOH. Requests can be made:

- By phone, at 1-833-234-CDBG or 1-833-234-2324
- By email to infoCDBG@vivienda.pr.gov
- Online at <https://recuperacion.pr.gov/en/contact/> (English) or at <https://recuperacion.pr.gov/contact/> (Spanish)
- By mail:
CDBG-DR Puerto Rico Program
P.O. Box 21365
San Juan, PR 00928-1365

Table of Contents

APA14 Public Comments 1

 Preface..... 1

Comment ID: 11/07/23_WP_I_Jose Toro(1) 4

 PRDOH Response:..... 4

Comment ID: 11/07/23_WP_I_Enrique(1) 4

 PRDOH Response:..... 4

Comment ID: 11/07/23_WP_PS_A19 LLC_Roy Colon(1) 5

 PRDOH Response:..... 5

Comment ID: 11/07/23_WP_I_Luis A Vera Ortiz(1) 6

 PRDOH Response:..... 6

Comment ID: 11/07/23_WP_I_José A Ruiz Matos(1) 6

 PRDOH Response:..... 7

Comment ID: 11/07/23_WP_I_Edna Damaris Carrión Torres(1) 7

 PRDOH Response:..... 7

Comment ID: 11/07/23_WP_I_Juan B Perez Perez(1) 8

 PRDOH Response:..... 8

Comment ID: 11/07/23_WP_I_luis(1) 8

 PRDOH Response:..... 8

Comment ID: 11/07/23_WP_I_Osvaldo sanchez santiago(1) 9

 PRDOH Response:..... 9

Comment ID: 11/07/23_WP_I_CDBG-R3(1) 9

 PRDOH Response:..... 10

Comment ID: 11/08/23_WP_I_Andrés G. Pérez de Jesúsob(1) 10

 PRDOH Response:..... 10

Comment ID: 11/08/23_WP_I_Andres G. Perez de Jesus(2) 11

 PRDOH Response:..... 11

Comment ID: 11/08/23_WP_I_Ivan Huerta Toro(1) 12

 PRDOH Response:..... 12

Comment ID: 11/08/23_WP_I_Iraida Lopez(1) 12

 PRDOH Response:..... 12

Comment ID: 11/08/23_WP_I_Juan F Rios Hernandez(1) 13

 PRDOH Response:..... 13

Comment ID: 11/08/23_WP_I_Ariel Matos Roldan(1) 14

 PRDOH Response:..... 14

Comment ID: 11/08/23_WP_I_Jesus Manuel(1)	16
PRDOH Response:.....	16
Comment ID: 11/08/23_WP_I_Ruben Acevedo Rosado(1)	17
PRDOH Response:.....	18
Comment ID: 11/09/23_WP_I_Imar Rivera Flores(1).....	18
PRDOH Response:.....	18
Comment ID: 11/12/23_WP_I_José L. Velázquez Padilla(1)	19
PRDOH Response:.....	20
Comment ID: 11/13/23_WP_I_Andrès G. Pèrez de Jesùs(1)	21
PRDOH Response:.....	21
Comment ID: 11/14/23_WP_I_Carlos Javier(1)	22
PRDOH Response:.....	22
Comment ID: 12/06/23_WP_PS_Go Sun Energy LLC_Ernesto Valle Quintana(1)	22
PRDOH Response:.....	23
Comment ID: 12/06/23_WP_PS_LA CAUSA_Kianna L Figueroa Feliciano(1)	24
PRDOH Response:.....	24
Comment ID: 12/07/23_WP_I_Sheila Algarín(1)	25
PRDOH Response:.....	25
Comment ID: 12/07/23_E_NGO_Centro para la Reconstrucción del Hábitat, Inc._Luis Gallardo(1)	26
PRDOH Response:.....	26
Comment ID: 12/07/23_E_NGO_Hispanic Federation_Maritere Padilla Rodríguez(1)	27
PRDOH Response:.....	32
Comment ID: 12/07/23_E_NGO_FURIA, Inc._Nayda Bobonis Cabrera(1)	36
PRDOH Response:.....	38

Public Comments

Comment ID: 11/07/23_WP_I_Jose Toro(1)

Comment: *"We as business owners have never received anything from cdbg funds, they have always put up 50000 obstacles [It is] only for the privileged".*

PRDOH Response:

Greetings José,

Thank you for your participation during the public comment period for the 14th Amendment to the CDBG-DR Action Plan (Substantial). The Puerto Rico Economic Development Bank (**BDE**, for its Spanish acronym) is responsible for managing the activities of the Small Business Financing (**SBF**) Program available under CDBG-DR funds, which provides assistance to micro and small businesses affected by Hurricanes Irma and María through grants to cover operating capital and mobile equipment costs. During the application process, the SBF Program received over 7,000 applications from micro and small businesses interested in participating in the benefits of the Program. Currently, the SBF Program has been able to assist more than 4,100 eligible entities, which have had the opportunity to finance operational expenses or mobile equipment necessary to produce goods and/or services.

PRDOH is committed to assisting small businesses affected by the hurricanes to ensure the recovery and growth of the business sector in Puerto Rico. For more information about the SBF Program, visit the PRDOH web page, available in English and Spanish at <https://recuperacion.pr.gov/en/download/small-business-financing-program/> (English) and <https://recuperacion.pr.gov/es/download/small-business-financing-program/> (Spanish).

Comment ID: 11/07/23_WP_I_Enrique(1)

Comment: *"Very good initiative of the agencies to help the citizen to recover. I am a 74 year old person and I was hopeful for the first round of solar panels but I was not lucky this time. Thanks anyway."*

PRDOH Response:

Greetings Enrique,

The Puerto Rico Department of Housing (**PRDOH**) thanks you for your participation in the public comment period for the 14th Amendment to the CDBG-DR Action Plan (Substantial). In addition, we value your support of the mitigation efforts carried out through the Home Energy Resilience Improvements Program (**CEWRI-HERI Subprogram**), more commonly known as the New Energy Program, under the CDBG-MIT Action Plan. The CEWRI-HERI Program provides assistance to eligible households for the installation of Photovoltaic Systems (**PVS**) with Battery Storage Systems (**BSS**) to

meet their energy needs. Applications to the Program take place through rounds designed to manage priorities, disbursement goals, and the capacity to process applications and install systems. PRDOH is currently planning to open a second round of tickets to give low- to moderate-income households the opportunity to submit an application to the CEWRI-HERI Program.

We ask that you stay on the lookout and re-attempt in the next rounds. Details and requirements for the upcoming rounds will be communicated to the public through the official PRDOH web page, available in English and Spanish at <https://nuevaenergia.pr.gov/en/> (English) and <https://nuevaenergia.pr.gov/> (Spanish).

Comment ID: 11/07/23_WP_PS_A19 LLC_Roy Colon(1)

Comment: *"Which works will be carried out for the repair of traffic lights, implementation of new technologies, and resilience against upcoming hurricanes? How can we be part of this potential program?"*

PRDOH Response:

Greetings Roy,

The City Revitalization Program (**CRP**) carried out with CDBG-DR funds is intended to fund targeted projects for the revitalization of urban centers and community corridors affected by Hurricanes Irma and María. The main objectives of the Program include, supporting the economic development of low and moderate-income communities, through which activities to support the development of affordable housing as well as the restoration of roads, sidewalks, public squares, among other essential infrastructure to achieve recovery and resilience to future disasters can be implemented.

The CRP Program also establishes the RE-Green Puerto Rico Initiative, which allows municipal governments and their partners to use CDBG-DR funds to incorporate resiliency measures to address the loss of Puerto Rico's natural resources and green landscape.

To learn more about eligible CRP projects, please visit the PRDOH web page where you will find Program Guidelines, available in English and Spanish at <https://recuperacion.pr.gov/en/city-revitalization/> (English) and <https://recuperacion.pr.gov/revitalizacion-de-la-ciudad/> (Spanish).

In addition, you can obtain more information about CDBG-DR/MIT funds by calling 1-833-234-2324, by sending an email to infoCDBG@vivienda.pr.gov or by regular mail at the following address: Puerto Rico CDBG-DR Program PO Box 21365 San Juan PR 00928-1365

Comment ID: 11/07/23_WP_I_Luis A Vera Ortiz(1)

Comment: *"It is hard to believe that the process continues to completely evade those of us who were relegated to no plane, not even relegated to a second plane[.] Our needs have not been met, I was in the shelter in Utuado during María and I still have not received any help to restore my house here in Utuado[.] Puerto Rico and make it resistant to new hurricanes[.] please contact me".*

PRDOH Response:

Greetings Luis,

The Puerto Rico Department of Housing (**PRDOH**) thanks you for your participation in the public comment period for the 14th Amendment to the CDBG-DR Action Plan (Substantial) and regrets your situation. PRDOH is committed to assisting families affected by Hurricanes Irma and María, as well as ensuring risk mitigation through the various recovery and mitigation programs available under CDBG-DR/MIT funds.

We understand, based on the information provided in your comment, that the Single-Family Housing Mitigation (**SFM**) Program under the CDBG-MIT Action Plan may interest you. The SFM Program provides mitigation assistance to families who are facing an immediate threat and whose homes have been rendered uninhabitable due to damage caused by recent disasters or hazards.

We urge you to contact or visit one of the intake centers located in different parts of Puerto Rico to verify if your home is in one of the areas identified as high risk. This will help determine your eligibility for assistance under the SFM Program.

For more information about the SFM Program's intake centers and eligibility requirements, please visit the PRDOH web page, available in English and Spanish at <https://recuperacion.pr.gov/en/single-family-housing-mitigation-program/> (English), and <https://recuperacion.pr.gov/programa-de-mitigacion-para-viviendas-unifamiliares/> (Spanish). In addition, you can obtain more information about CDBG-DR/MIT funds by calling 1-833-234-2324, by sending an email to infoCDBG@vivienda.pr.gov or by regular mail at the following address: Puerto Rico CDBG-DR Program PO Box 21365 San Juan PR 00928-1365.

Comment ID: 11/07/23_WP_I_José A Ruiz Matos(1)

Comment: *"I want to comment, and it is regarding the program[.] supposedly r3 did not finish for the repair of my house[.] In addition, I filled out the documents for solar panels [and] it was evaluated[.] My number is [REDACTED] and also the water tank. I am an elderly person, I am 62 years old, of low income, I have nothing except the social security assistance and the PAN benefit from the Department of Family [.] I have tried to get in contact and I have been in contact with r3 on several occasions I would say [but] I could never see the availability to help the customer [and I am] still waiting for your call and for you to visit my house these*

days[.] The winds made the water enter into my house[.] Thank you, I have made myself heard"

PRDOH Response:

Greetings José,

The Puerto Rico Department of Housing (**PRDOH**) appreciates your participation during the public comment period for the 14th (Substantial) Amendment to the CDBG-DR Action Plan. If you would like to know the status of your Home Repair, Reconstruction, or Relocation (**R3**) Program application, please visit the following website: <https://recuperacion.pr.gov/iframes/intakestatus>. You can also request the status of your case and any other pending applications under other programs by sending an email to infoCDBG@vivienda.pr.gov, by calling 1-833-234-2324 or TTY 787-522-5950, or by mail: Puerto Rico CDBG-DR/MIT Program, P.O. Box 21365 San Juan PR 00928-1365.

If you wish to file a formal complaint, we invite you to do so through our website: <https://recuperacion.pr.gov/iframes/CityComplaints>. You may also send a complaint by mail to the following address: Attn: Legal Division, P.O. Box 21365 San Juan, PR 00928-1365; or by email to: LegalCDBG@vivienda.pr.gov. To ensure proper handling, the complaint must meet certain requirements, which include that it must be submitted in writing, include the complainant's full name and contact information, describe the nature of the complaint, specify the desired resolution, provide details of persons with whom you have previously been in contact regarding the complaint, and attach any supporting evidence.

Comment ID: 11/07/23_WP_I_Edna Damaris Carrión Torres(1)

Comment: *"Greeting[s] I hope you will take me into consideration to help me in build my house as every time hurricane season comes, it is very difficult to be safe in my house[.] I am a senior citizen, and I am very worried about being left without a home."*

PRDOH Response:

Greetings Edna,

Thank you for your comment. Currently, the Home Repair, Reconstruction, or Relocation Program (**R3**) has closed for applications because it has reached the limit of its available financing capacity. However, in the CDBG-MIT Action Plan, PRDOH established the Single-Family Housing Mitigation (**SFM**) Program. The SFM Program focuses on prioritizing mitigation assistance for households with an immediate threat that are uninhabitable due to damage from recent disasters or dangerous events, or that are under immediate threat due to damage from recent events. We urge you to contact or visit one of the intake centers located in different parts of Puerto Rico to verify if your home is located in one of the areas identified as high risk. This will help determine your eligibility for assistance under the SFM Program.

To learn more about the SFM Program, visit the PRDOH website for more information on the application process, eligibility requirements, and other details available in the SFM Program Guidelines at: <https://recuperacion.pr.gov/en/single-family-housing-mitigation-program/> (English) or <https://recuperacion.pr.gov/en/single-family-housing-mitigation-program/> (Spanish).

Comment ID: 11/07/23_WP_I_Juan B Perez Perez(1)

Comment: *"It's been 2 years since I submitted the documents to PRDOH for the title of the house and I would like to know the status of that application."*

PRDOH Response:

Greetings Juan,

Based on the information provided in your comment, we understand that you are referring to the Title Clearance (**TC**) Program. The TC Program assists low- and moderate-income families in obtaining improved and marketable titles to their properties to ensure the sustainability and security of the residents. Your case was referred to the TC Program for them to provide you with the status of your application.

You may also contact us by email at: infoCDBG@vivienda.pr.gov, by calling 1-833-234-2324 or TTY 787-522-5950; or by regular mail to the following address: CDBG-DR/MIT Program Puerto Rico, P.O. Box 21365, San Juan, PR, 00928-1365, to inquire about the status of your application. To learn more about the TC Program, visit the PRDOH web page, available in English and Spanish, at <https://recuperacion.pr.gov/en/title-clearance/> (English) and <https://recuperacion.pr.gov/autorizacion-de-titulos/> (Spanish).

Comment ID: 11/07/23_WP_I_luis(1)

Comment: *"WE HAVE BAD ADMINISTRATORS IN PUERTO RICO AND WE ARE CONTINUE TO BE BANKRUPT, THE IVU [Sales and Use Tax] WAS CREATED TO PAY OFF THE TAX DEBT AND TO THIS DAY IT HAS NOT BEEN PAID OFF AND WE ARE STILL WORSE OFF THAN BEFORE."*

PRDOH Response:

Greetings Luis,

The Puerto Rico Department of Housing (**PRDOH**) is responsible for administering CDBG-DR funds for hurricanes Irma and María recovery. Through the CDBG-DR Action Plan, PRDOH established twenty (20) programs designed to provide grant opportunities to citizens, small businesses, municipalities, agencies, and non-governmental organizations for the purpose of addressing the unmet needs of the local housing, infrastructure, economic, and planning sectors affected by the hurricanes.

We clarify that the requirements for use and disbursement of CDBG-DR funds are established by federal regulation. In addition, they must comply with state and federal legislation. For more information about the CDBG-DR Programs, visit the PRDOH web page, available in English and Spanish at <https://recuperacion.pr.gov/en/programs/> (English) and <https://recuperacion.pr.gov/en/programs/> (Spanish).

Comment ID: 11/07/23_WP_I_Osvaldo sanchez santiago(1)

Comment: *"My house is made of wood and the assistance from FEMA was only enough to repair part of it[,] from then on nothing, and I have an electrical problem[,] Take action."*

PRDOH Response:

Greetings Osvaldo,

The Puerto Rico Department of Housing (PRDOH) thanks you for your participation in the public comment period for the 14th Amendment to the CDBG-DR Action Plan (Substantial). Currently, the Home Repair, Reconstruction, or Relocation Program (**R3**) has closed for applications because it has reached the limit of its available financing capacity. However, in the CDBG-MIT Action Plan, PRDOH established the Single-Family Housing Mitigation (**SFM**) Program. The SFM Program focuses on prioritizing mitigation assistance for households with an immediate threat that are uninhabitable due to damage from recent disasters or dangerous events, or that are under immediate threat due to damage from recent events. We urge you to contact or visit one of the intake centers located in different parts of Puerto Rico to verify if your home is in one of the areas identified as high risk. This will help determine your eligibility for assistance under the SFM Program.

To learn more about the SFM Program, visit the PRDOH web page for information on the application process, eligibility requirements, and other details available in the SFM Program Guidelines: <https://recuperacion.pr.gov/en/single-family-housing-mitigation-program/> (English) or <https://recuperacion.pr.gov/programa-de-mitigacion-para-viviendas-unifamiliares/> (Spanish). In addition, you can obtain more information about CDBG-DR/MIT funds by calling 1-833-234-2324, by sending an email to infoCDBG@vivienda.pr.gov, or by regular mail at the following address: Puerto Rico CDBG-DR Program PO Box 21365 San Juan PR 00928-1365.

Comment ID: 11/07/23_WP_I_CDBG-R3(1)

Comment: *"I was impacted by Hurricane Maria[,] I didn't receive help when I found out about the R3 program it was closed for applications."*

PRDOH Response:

The Puerto Rico Department of Housing (**PRDOH**) thanks you for your participation in the public comment period for the 14th Amendment to the CDBG-DR Action Plan (Substantial). Unfortunately, the Home Repair, Reconstruction, or Relocation Program (**R3**) has closed for applications because it has reached the limit of its available financing capacity. However, in the CDBG-MIT Action Plan, PRDOH established the Single-Family Housing Mitigation (**SFM**) Program. The SFM Program focuses on prioritizing mitigation assistance for households with an immediate threat that are uninhabitable due to damage from recent disasters or dangerous events, or that are under immediate threat due to damage from recent events. We urge you to contact or visit one of the intake centers located in different parts of Puerto Rico to verify if your home is located in one of the areas identified as high risk. This will help determine your eligibility for assistance under the SFM Program.

To learn more about the SFM Program, visit the PRDOH web page for more information on the application process, eligibility requirements, and other details available in the SFM Program Guidelines: <https://recuperacion.pr.gov/en/single-family-housing-mitigation-program/> (English) or <https://recuperacion.pr.gov/programa-de-mitigacion-para-viviendas-unifamiliares/> (Spanish). In addition, you can obtain more information about CDBG-DR/MIT funds by calling 1-833-234-2324, by sending an email to infoCDBG@vivienda.pr.gov, or by regular mail at the following address: Puerto Rico CDBG-DR Program PO Box 21365 San Juan PR 00928-1365.

Comment ID: 11/08/23_WP_I_Andrés G. Pérez de Jesúsob(1)

Comment: *"The recovery process is very slow. I am a disabled person who has been waiting for the solar panel voucher assistance. I can't bear the high cost of LUMA anymore."*

PRDOH Response:

Greetings Andrés,

Based on the information provided in your comment, PRDOH understands that you are referring to the Home Energy Resilience Improvements (**CEWRI-HH**) Program under CDBG-MIT funds. The CEWRI-HH provides assistance to households for the purchase and installation of renewable solar energy equipment, which consists of a Photovoltaic System (**PVS**) and a Battery Storage System (**BSS**). This Program has two subprograms: the Home Energy Resiliency Improvements Program, more commonly known as the New Energy Program, and the Incentive Program, more commonly known as the Solar Incentive Program. Both programs conducted their first ticketing round for those who met the initial screening criteria prior to submitting a completed application. Please note that if you have received a ticket, you must complete the application process to determine the eligibility of your case according to the requirements outlined in the CEWRI-HH Program Guidelines.

If you applied to the New Energy Program, you can check the status of your application at the following link: <https://nuevaenergia.pr.gov/tu-solicitud.html>. On the other hand, if you applied to the Solar Incentive Program, you can check the status of your application at the following link: <https://incentivosolar.pr.gov/form.html>.

You may also contact us by email at: infoCDBG@vivienda.pr.gov, by calling 1-833-234-2324 or TTY 787-522-5950; or by regular mail to the following address: CDBG-DR/MIT Program Puerto Rico, P.O. Box 21365, San Juan, PR, 00928-1365, to inquire about the status of your application.

For more information about the application process and general information about the CEWRI-HH Program, visit the PRDOH web page, available in English and Spanish at <https://recuperacion.pr.gov/en/home-energy-resilience-improvements-program/> (English) and <https://recuperacion.pr.gov/programa-de-mejoras-de-resiliencia-energetica-en-el-hogar/> (Spanish).

Comment ID: 11/08/23_WP_I_Andres G. Perez de Jesus(2)

Comment: *"The cost of electricity is out of control. You are very slow with the process of helping the disabled."*

PRDOH Response:

Greetings Andrés,

Please refer to the PRDOH response included in your first comment to learn about the Home Energy Resiliency Improvements Program (**CEWRI-HH**) under CDBG-MIT funds, as we understand from the information provided that you may be referring to this specific Program. We also clarify that under the CEWRI-HH Program, PRDOH will give priority to households with high energy security vulnerability where the life expectancy of at least one (1) member depends on one or more devices that require electricity.

Applications to the Program take place through rounds designed to manage priorities, disbursement goals, and the capacity to process applications and install systems. PRDOH is currently planning to open a second round of tickets to give low-to moderate-income households the opportunity to submit an application to the Program.

We ask that you stay on the lookout and re-attempt in the next rounds. Details and requirements for the upcoming rounds will be communicated to the public through the Program's official web page, available in English and Spanish at <https://nuevaenergia.pr.gov/en/> (English) and <https://nuevaenergia.pr.gov/> (Spanish).

Comment ID: 11/08/23_WP_I_Ivan Huerta Toro(1)

Comment: "I would be grateful if you could send me a copy of the 14th Amendment of the CDBG-DR Action Plan to the following email address: [REDACTED]. Thank you in advance for your response to this request."

PRDOH Response:

Greetings Ivan,

We have referred your request to the PRDOH CDBG Communications Division, who has arranged to send you a copy of the 14th Amendment to the CDBG-DR Action Plan (Substantial). We appreciate your interest in learning more about the changes proposed in this amendment. For more information on CDBG-DR funds, visit the PRDOH web page, available in English and Spanish at <https://recuperacion.pr.gov/en/action-plan/> (English) and <https://recuperacion.pr.gov/plan-de-accion/> (Spanish).

Comment ID: 11/08/23_WP_I_Iraida Lopez(1)

Comment: "I think the Amendment to the Action Plan is very good. But I'd like to see them prioritize low-income people who yearn to own solar panels."

PRDOH Response:

Greetings Iraida,

Thank you for your participation during the public comment period for the 14th Amendment to the CDBG-DR Action Plan (Substantial). In the CDBG-DR Action Plan, the Puerto Rico Department of Housing (**PRDOH**) established the Community Energy and Water Resilience Installations (**CEWRI**) Program, with the objective of providing facilities that promote energy and water efficiency and resiliency for cases that are in the process of rehabilitation, reconstruction, or relocation, or that have received new construction as part of the Home Repair, Reconstruction, or Relocation (**R3**) Program, at no cost to the applicant. This assistance is intended to benefit low- and moderate-income persons affected by Hurricanes Maria and/or Irma.

PRDOH is also responsible for the administration of the Home Energy Resilience Improvements Program (**CEWRI-HH**) under CDBG-MIT funds. The CEWRI-HH Program consists of two subprograms: the Home Energy Resiliency Improvements Program (**CEWRI-HERI Subprogram**), more commonly known as the New Energy Program, and the Incentive Program (**CEWRI-IP Subprogram**), more commonly known as the Solar Incentive Program. The HERI Program is focused on providing assistance to low- and moderate-income households with energy needs. Through this program, eligible applicants may receive an award of up to a maximum of thirty thousand dollars (\$30,000) (or less, depending on the equipment and installation costs) for the purchase and installation of solar renewable energy system consisting of a

Photovoltaic System (**PVS**) and a Battery Storage System (**BSS**). PRDOH is currently planning to open a second round of tickets to give low- to moderate-income households the opportunity to submit an application to the CEWRI-HERI Program.

If you would like to learn more about the CEWRI-HERI Program application process, requirements or other details, please visit the PRDOH web page, available in English and Spanish at <https://nuevaenergia.pr.gov/en/> (English) and <https://nuevaenergia.pr.gov/> (Spanish).

Comment ID: 11/08/23_WP_I_Juan F Rios Hernandez(1)

Comment: "Since 2021 in [the month of] June, they began to build my house, after a thousand problems due to the IRRESPONSIBILITY on the part of the contractor, it is now finished, but now I am waiting for the permits from OGPE which I have been waiting for 2 months with a finished house and they have not gotten the permits!!!! WHO IS TO BLAME FOR THIS DELAY NOW ??? THE OGPE OR THE CONTRACTOR ICF CONTRACTOR. MY CASE MANAGER NEVER CONTACTED ME THROUGHOUT THE PROCESS. I VISITED HIM TWICE FOR HIM TO DO HIS JOB. CASE MANAGER ICF CONTRACTOR MARIO RIVERA THIS LED TO A TOTAL DISABILITY WITH SOCIAL SECURITY. [REDACTED] CASE NUMBER THANK YOU."

PRDOH Response:

Greetings Juan,

The Home Repair, Reconstruction, or Relocation (**R3**) Program is committed to providing eligible applicants with decent, safe, and sanitary housing by implementing activities designed to address unmet housing needs caused by the impact of Hurricanes Irma and/or María. It is important to highlight that each R3 Program Manager is responsible for complying with the clauses established in the contract, programmatic guidelines, among other federal and state requirements to ensure the effective and adequate implementation of the projects using CDBG-DR funds. Your case was referred to the R3 Program. However, PRDOH also provides a portal for Program participants to learn about the status of their application, available at the following website: <https://recuperacion.pr.gov/iframes/intakestatus>. You can also request the status of your case and any other pending applications under other programs by sending an email to infoCDBG@vivienda.pr.gov, by calling 1-833-234-2324 or TTY 787-522-5950, or by mail: Puerto Rico CDBG-DR/MIT Program, P.O. Box 21365 San Juan PR 00928-1365.

If you wish to file a formal complaint, we invite you to do so through our website: <https://recuperacion.pr.gov/iframes/CityComplaints>. You may also send a complaint by mail to the following address: Attn: Legal Division, P.O. Box 21365 San Juan, PR 00928-1365; or by email to: LegalCDBG@vivienda.pr.gov. To ensure proper handling, the complaint must meet certain requirements, which include that it must be submitted in writing, include the complainant's full name and contact information, describe the nature of the complaint, specify the desired resolution,

provide details of persons with whom you have previously been in contact regarding the complaint, and attach any supporting evidence.

Comment ID: 11/08/23_WP_I_Ariel Matos Roldan(1)

Comment: "Greetings.

Based on the discriminatory, secretive, and biased manner in which the proposal for the installation of photovoltaic systems was carried out. In which the spaces were filled in less than an hour to be able to just apply, as echoed by the local press. The internal handling for the benefit of a few is obvious. Eligibility and selection criteria were not defined. The demographic composition of those who received assistance for their medical, financial, and other needs was not disclosed, yet it sounded very nice in the justification.

In light of the above regarding the administration of funds in this U.S. colony, I would like to point out that the CDBG-DR Action Plan lax oversight mechanisms to verify the proper use of funds. It includes items that, in my opinion as a resident of Puerto Rico, lend themselves to diversion of funds, such as the million-dollar item for housing counseling. It reminds me of the hemorrhaging of public funds for consultants to the legislative bodies of the colony. I ask that someone with a conscience establish oversight mechanisms. I also want to raise the concern that this proposal may be manipulated to depopulate the island of the natives, as they call us, by giving preferential treatment to foreign companies or individuals to establish businesses or appropriate the housing that the people need. Dorado in the northern area, for example, and Rincón in the west.

Lastly, granting full administrative control to the Department of Housing lends itself to repeating what I have stated before, the best way is to integrate other government agencies, with the understanding that we have dedicated employees, without the creation of private mechanisms to manage government proposals.

Regards,
Mr. Ariel Matos Roldan."

PRDOH Response:

Greetings Ariel,

The Puerto Rico Department of Housing (**PRDOH**) thanks you for your participation in the public comment period for the 14th Amendment to the CDBG-DR Action Plan (Substantial). Based on your comment, we understand that you are referring to the Community Energy and Water Resilience Installations - Households (**CEWRI-HH**) Program within the CDBG-MIT Action Plan. We would like to clarify that CDBG-DR and CDBG-MIT funds are two different allocations, and while CDBG-DR funds respond to the substantial damage that Puerto Rico suffered in the aftermath of Hurricanes Irma and María, CDBG-MIT funds are used to address mitigation needs that go beyond the threats posed by the hurricanes. These funds are intended to provide assistance

to citizens, small businesses, municipalities, agencies, and non-governmental organizations in Puerto Rico to receive grants that impact recovery or promote resiliency in the housing, infrastructure, and economic development sectors.

The CEWRI-HH Program under the CDBG-MIT funds consists of two subprograms: The Home Energy Resiliency Improvement Program (**CEWRI-HERI Subprogram**), more commonly known as the New Energy Program, and the Incentive Program (**CEWRI-IP Subprogram**), more commonly known as the Solar Incentive Program. The CEWRI-HERI Program provides assistance to low to moderate income (**LMI**) households for the installation of Photovoltaic Systems (**PVS**) with Battery Storage Systems (**BSS**) to meet their energy needs. The CEWRI-IP program, on the other hand, is designed to finance the installation of PVS with BSS in households with up to two hundred percent (200%) Area Median Family Income (**AMFI**) that own or have an ownership interest in a single-family structure that is their primary residence.

Both programs conducted a round of tickets designed to manage priorities, disbursement goals, and the ability to process applications and install the systems. Prior to conducting the rounds for each subprogram, PRDOH was responsible for carrying out various outreach efforts to inform citizens about the application process, admission requirements, number of tickets, and other details about the programs.

The first round of the CEWRI-HERI Program was aimed at households whose income did not exceed thirty percent (30%) AMFI. To obtain a ticket to participate in the application process, citizens had the opportunity to apply through the Program's online Application Portal, by contacting the Call Center, or by visiting one of the ten (10) Intake Centers located throughout Puerto Rico. Due to the high volume of applications received through the online portal and call center, PRDOH recognizes that several citizens were unable to take part in the first round of the CEWRI-HERI Program. However, we would like to clarify that the PRDOH Team is planning to hold a second round of tickets to give low to moderate income families the opportunity to submit an application to the Program.

As for the CEWRI-IP Program, PRDOH only held one round, which offered a total of six thousand (6,000) tickets to households with an income between zero percent (0%) and two hundred (200%) AMFI. It is important to note that the ticket is issued to those who meet the initial selection criteria prior to submitting a complete application to the Program, so the applicant's eligibility will be determined after the Program has evaluated the documentation.

To learn more about the CEWRI-HERI Program application process, eligibility criteria or other details, visit the PRDOH web page, available in English and Spanish at <https://nuevaenergia.pr.gov/en/> (English) and <https://nuevaenergia.pr.gov/> (Spanish). To learn more about the CEWRI-IP Program, visit the PRDOH web page, available in English and Spanish at <https://www.incentivosolar.pr.gov/en/> (English) and <https://www.incentivosolar.pr.gov/> (Spanish).

With respect to the administration of federal funds, the Government of Puerto Rico designated PRDOH as the agency responsible for administering CDBG-DR and CDBG-MIT funds. As a recipient of CDBG-DR and CDBG-MIT awards, PRDOH is

responsible for the proper administration of federal funds provided by the U.S. Department of Housing and Urban Development (**HUD**). In order to comply with the policies and regulations established by HUD, PRDOH developed the Action Plan, which describes how emergency or mitigation needs will be addressed based on risk and the distribution of funds.

In the same manner, PRDOH has developed several policies that establish standards and guidelines for the proper implementation and administration of programs and operational areas to be followed by any entity, including PRDOH and its employees, responsible for carrying out eligible program activities. To prevent fraud, waste, abuse or mismanagement, PRDOH has established the Anti-Fraud, Waste, Abuse or Mismanagement Policy (AFWAM), which describes the procedures to be followed to report and rectify these illegal acts. The policy is available in English and Spanish at <https://recuperacion.pr.gov/en/download/afwam-policy/> (English) and <https://recuperacion.pr.gov/download/politica-afwam/> (Spanish). If you know of or suspect that someone has committed fraud, waste, abuse, or mismanagement in relation to the CDBG-DR and CDBG-MIT programs, visit the PRDOH website at <https://recuperacion.pr.gov/app/cdbgdrrpublic/Fraud> (English) or <https://recuperacion.pr.gov/app/cdbgdrrpublic/Fraud?culture=es-ES> (Spanish) to complete an official form. This form may also be submitted by email, as a post, by mail, or in person.

PRDOH is committed to working to strengthen our communities through housing, infrastructure, and economic development projects that promote recovery or resiliency and reduce loss of life in the face of future disasters. To learn more about CDBG-DR and CDBG-MIT funds, you may contact us at 1-833-234-2324, by email to infoCDBG@vivienda.pr.gov, or by regular mail to the following address: Puerto Rico CDBG-DR Program PO Box 21365 San Juan PR 00928-1365.

Comment ID: 11/08/23_WP_I_Jesus Manuel(1)

Comment: *“Applications should be prioritized, based on the level of "Risk" they represent. Structures built on or before 1978 are structures that, having been physically affected by the disaster, are at imminent risk of causing serious harm to their occupants due to exposure to the presence of LEAD in paint. This comes from the program guidelines themselves. I consider this a priority in need for attention. Thank you for the opportunity to comment.*

PRDOH Response:

Greetings Jesús,

The Puerto Rico Department of Housing (**PRDOH**) thanks you for your participation in the public comment period for the 14th Amendment to the CDBG-DR Action Plan (Substantial). Based on the information provided in your comment, we understand that you are referring to the Home Repair, Reconstruction, or Relocation (**R3**) Program under CDBG-DR funds, or the Single-Family Housing Mitigation (**SFM**) Program under CDBG-MIT funds.

The R3 Program provides assistance to repair, rebuild, or relocate homes impacted by Hurricanes Irma and Maria. Currently, R3 Program is closed for applications because it has reached the limit of its available financing capacity. However, we would like to note that PRDOH has established priority groups to address the unmet needs of the following: elderly persons, applicants with impairments or disabilities, and applicants with significant damage to their homes. For more information about the R3 Program, visit the program web page, available in English and Spanish at <https://recuperacion.pr.gov/en/r3/> (English) and <https://recuperacion.pr.gov/r3/> (Spanish).

The SFM Program, on the other hand, is designed to prioritize mitigation assistance to low- and moderate-income households facing an immediate threat and whose homes have been rendered uninhabitable due to damage caused by recent disasters or hazards. Likewise, this program is intended to assist homeowners who are still living with a "blue roof" or living in high-risk areas. The SFM Program has a specific approach to reach these populations identified through the study executed in the Blue Roof Survey Program under CDBG-DR funds. If you would like to learn more about the SFM Program, please visit the PRDOH webpage, available in English and Spanish at <https://recuperacion.pr.gov/en/download/single-family-housing-mitigation-program/> (English), and <https://recuperacion.pr.gov/download/programa-de-mitigacion-para-viviendas-unifamiliares/> (Spanish).

Regarding lead-based paint hazard assessment, the Cross Cutting Guidelines state the following: *"All housing units receiving assistance with CDBG-DR funds must comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. § 4821-4846) and the lead-based paint regulations found in 24 C.F.R. Part 35 on Lead-Based Paint Poisoning Prevention in Certain Residential Structures, as well as all regulations and procedures established by the Government of Puerto Rico and any amendments thereto, including Regulation No. 9098, issued July 16, 2019, Regulations for the Proper Handling of Lead-Based Paint Activities."* These guidelines also apply to CDBG-MIT funds. To read the Cross Cutting Guidelines, visit the PRDOH web page, available in English and Spanish at <https://recuperacion.pr.gov/en/download/cross-cutting-guidelines/> (English) and <https://recuperacion.pr.gov/download/guias-intersectoriales/> (Spanish).

Comment ID: 11/08/23_WP_I_Ruben Acevedo Rosado(1)

Comment: "My home on [REDACTED] sufer damage, this is a wooden home with metal roof. Been in my 70's got no help in fixing the house because FEMA wanted me to leave my home for them to do the repairs. Got denied the help because I could not leave my home, what needed repair did not required me to leave my home. Got no help with cleaning up all the metal roofing on my yard nor to fix the woods that came out that water enters into the home. It seems to me that FEMA does not take in consideration wooden homes, with metal roofing, in historic sites. So now my home with all the water on the walls, floors, and

finally some metal roofs out is unbearable to live in it. They tell me I can live the way it is and to put my wet furniture out to dry..”

PRDOH Response:

Greetings Ruben,

The Puerto Rico Department of Housing (**PRDOH**) thanks you for your participation in the public comment period for the 14th Amendment to the CDBG-DR Action Plan (Substantial) and regrets your situation. Based on the information provided in your comment, we encourage you to contact or visit one of the intake centers in Puerto Rico to verify if your home is located in one of the areas identified as a high-risk zone in order to receive assistance under the CDBG-MIT Action Plan's Single-Family Housing Mitigation (**SFM**) Program.

The SFM Program is designed to assist homeowners with immediate threats to their homes and livelihoods. The Program's objective is to ensure that the unmet mitigation needs of low- and moderate-income persons from the most impacted and affected populations are addressed.

For more information about the SFM Program's intake centers and eligibility requirements, please visit the PRDOH web page, available in English and Spanish at <https://recuperacion.pr.gov/en/single-family-housing-mitigation-program/> (English), and <https://recuperacion.pr.gov/programa-de-mitigacion-para-viviendas-unifamiliares/> (Spanish). In addition, you can obtain more information about CDBG-DR/MIT funds by calling 1-833-234-2324, by sending an email to infoCDBG@vivienda.pr.gov or by regular mail at the following address: Puerto Rico CDBG-DR Program PO Box 21365 San Juan PR 00928-1365.

Comment ID: 11/09/23_WP_I_Imar Rivera Flores(1)

Comment: "I earnestly request that my application [REDACTED], denied in 2020 due to income, be reopened or reevaluated since the damage to my house is getting worse by the day, I have been denied almost all assistance, and my income has decreased from 2021 to the present. *Thank you*"

PRDOH Response:

Greetings Imar,

Based on the information provided in your comment, we understand that you are referring to the Home Repair, Reconstruction, or Relocation (**R3**) Program. The Program Reconsideration and/or Administrative Review section of the R3 Program Guidelines includes the program reconsideration process. Applicants have twenty (20) calendar days from the date they receive a copy of the Program's Notice of Determination to submit a request for reconsideration. If the applicant does not contest a determination within the time specified, such inaction will be considered an acceptance of the determination. We would also like to clarify that the Program

is limited to assisting applicants who are classified as having a low to moderate income at the time of eligibility determination. For additional details about the R3 Program, visit the program web page, available in English and Spanish at <https://recuperacion.pr.gov/en/r3/> <https://recuperacion.pr.gov/en/r3/> (English) and <https://recuperacion.pr.gov/r3/> (Spanish).

Based on the information provided in your comment, we encourage you to contact or visit one of the intake centers in Puerto Rico to verify if your home is located in one of the areas identified as a high-risk zone in order to receive assistance under the CDBG-MIT Action Plan's Single-Family Housing Mitigation (**SFM**) Program.

The SFM Program is designed to assist homeowners with immediate threats to their homes and livelihoods. The Program's objective is to ensure that the unmet mitigation needs of low- and moderate-income persons from the most impacted and affected populations are addressed.

For more information about the SFM Program's intake centers and eligibility requirements, please visit the PRDOH web page, available in English and Spanish at <https://recuperacion.pr.gov/en/single-family-housing-mitigation-program/> (English), and <https://recuperacion.pr.gov/programa-de-mitigacion-para-viviendas-unifamiliares/> (Spanish). In addition, you can obtain more information about CDBG-DR/MIT funds by calling 1-833-234-2324, by sending an email to infoCDBG@vivienda.pr.gov or by regular mail at the following address: Puerto Rico CDBG-DR Program PO Box 21365 San Juan PR 00928-1365.

Comment ID: 11/12/23_WP_I_José L. Velázquez Padilla(1)

Comment: *"Would it be possible that if I have a voucher and I have not been able to present a new house to the relocation program, to present a property that could be made livable with the economic resources from the voucher?"*

The CDBG MIT program has not clearly directed federal or state agencies to the municipal government to directly advise those areas identified as high flood risk for lives and property, something that should be mandatory to provide direct information to the affected residents

The program has some very confusing and controversial details so it would be beneficial for them to personally visit the areas identified for this mitigation program to improve and be more effective with this new and other information

The program, together with the mayor, could give priority to those who already have vouchers for the acquisition of these future abandoned houses and put on hold already identified people and houses

It is highly recommended that both the state and the municipal authorities directly and personally inform the identified high-risk communities about the possibility of property elevation

Foreclosed houses and in the possession of the municipality could be integrated into the program to expedite some of those with vouchers

It appears that the federal or state program will negotiate with the municipalities the properties under its ownership, this should be the first priority to ease the program and the aid

They could consider the properties presented and have a document for the same [property] for applicants with approved vouchers who are interested in a disused property

The amount of the voucher given to a relocation applicant to rehabilitate an unused property after acquisition by the PRDOH MIT program could be considered

As the HUD approval process proceeds after all state applications have been submitted, it can already identify homes that may qualify, taking into account all details such as non-flood zones, non-flood, accessibility, landslide, and other factors that may limit eligibility

It is recommended that the municipality, i.e. the mayor, not be the one to take jurisdiction and recommend to whom these properties should be given to the applicants, which could be politically handled

Make a list of applicants waiting for relocation vouchers by municipality and priority

Take an inventory of the properties in question and ensure that only applicants with relocation vouchers have access to the property, as those in the home repair or reconstruction program may not qualify, which would be a major setback for the program."

PRDOH Response:

Greetings José,

The Puerto Rico Department of Housing (**PRDOH**) thanks you for your participation in the public comment period for the 14th Amendment to the CDBG-DR Action Plan (Substantial). Your recommendations have been registered and will be taken into consideration for the revision of this amendment. Based on the information provided in your comment, we understand that you may be referring to the Home Repair, Reconstruction, or Relocation (**R3**) Program under CDBG-DR funds, or the Single-Family Housing Mitigation (**SFM**) Program under CDBG-MIT funds. It is important to note that CDBG-DR and CDBG-MIT funds are two different allocations, and while CDBG-DR funds respond to the substantial damage that Puerto Rico suffered in the aftermath of hurricanes Irma and María, CDBG-MIT funds are used to address mitigation needs that go beyond the threats posed by the hurricanes.

Relocation vouchers are included as part of the services provided by the R3 program under CDBG-DR funds. If you are a relocation participant under the R3 Program and have not yet been able to acquire a replacement home, we recommend that you contact your Case Manager to obtain housing counseling services from HUD-

certified counselors who can provide you with the support you need during the relocation process. If you are a participant in the SFM Program under the CDBG-MIT funds, which offers services similar to the R3 Program, you may also contact your Case Manager to assist you in acquiring an eligible home to complete the relocation process.

Regarding the process of acquiring a relocation property, both R3 Program relocation participants and SFM Program relocation participants have access to the New Construction Properties Catalog throughout the counseling services, which has been implemented by PRDOH to be made available to such participants to give them the option of selecting and acquiring a new construction housing unit. At this time, the Catalog includes a total of twenty (20) projects in Puerto Rico that are located outside of the hazard zones. Similarly, both programs offer housing counseling to assist them during the relocation process. PRDOH is also responsible for directing the Single-Family Housing Development Initiative, which aims to build up to three thousand (3,000) new construction units in different projects throughout Puerto Rico. The units will be available for eligible applicants with an R3 Program or SFM Program relocation voucher to have the opportunity to select a new home from PRDOH's catalog of New Construction Projects.

Additionally, please note that PRDOH is also in charge of implementing the Vacant Property Assessment (**VPA**) Initiative, whose objective is to identify vacant structures in all seventy-eight (78) municipalities with the potential of being easily rehabilitated and subsequently integrated into the affordable housing market. The goal of the VPA Initiative is to prepare a detailed inventory of these vacant structures by neighborhood, including property geolocation (residential, industrial, commercial, others), legal status (ownership, liens), structural condition, photos, and other characteristics.

For additional details about the R3 Program, visit the program page, available in English and Spanish at <https://recuperacion.pr.gov/en/r3/> (English) and <https://recuperacion.pr.gov/r3/> (Spanish). If you would like to learn more about the SFM Program, please visit the PRDOH webpage, available in English and Spanish at <https://recuperacion.pr.gov/en/download/single-family-housing-mitigation-program/> (English), and <https://recuperacion.pr.gov/download/programa-de-mitigacion-para-viviendas-unifamiliares/> (Spanish).

Comment ID: 11/13/23_WP_I_Andrès G. Pèrez de Jesùs(1)

Comment: *"I need you to give me financial assistance to install solar panels. The investment is too high for us."*

PRDOH Response:

Greetings, Andrés!

The Puerto Rico Department of Housing (**PRDOH**) appreciates your participation during the public comment period for the 14th (Substantial) Amendment to the CDBG-DR Action Plan. Included among the available programs with CDBG-MIT funds managed by PRDOH is the Home Energy Resiliency Improvement Program (**CEWRI-HH**), which is organized into two subprograms: the Home Energy Resilience Improvements Program (**CEWRI-HERI Subprogram**), more commonly known as the New Energy Program; and the Incentive Program (**CEWRI-IP Subprogram**), also commonly known as the Solar Incentive Program. The CEWRI-HERI Program is focused on providing assistance to low- and moderate-income households with energy needs. Through this program, eligible applicants may receive an award of up to a maximum of thirty thousand dollars (\$30,000) (or less, depending on the equipment and installation costs) for the purchase and installation of solar renewable energy system consisting of a Photovoltaic System (**PVS**) and a Battery Storage System (**BSS**). PRDOH is currently planning to open a second round of tickets to give low- to moderate-income households the opportunity to submit an application to the CEWRI-HERI Program.

To learn more about the application process or the CEWRI-HERI Program, please visit the PRDOH webpage, available in English and Spanish, at <https://nuevaenergia.pr.gov/en/> (English) and <https://nuevaenergia.pr.gov/> (Spanish).

Comment ID: 11/14/23_WP_I_Carlos Javier(1)

Comment: *"An increase in the program's budget and amount per entity should be considered; it is not enough to meet existing needs."*

PRDOH Response:

Greetings, Carlos!

The Puerto Rico Department of Housing (**PRDOH**) appreciates your participation during the public comment period for the 14th (Substantial) Amendment to the CDBG-DR Action Plan. Your comment fails to provide information identifying the program for which you are recommending a budget increase. However, we encourage you to contact the PRDOH team by calling 1-833-234-2324 or by email to infoCDBG@vivienda.pr.gov, or, by regular mail, to the following address: Puerto Rico CDBG-DR Program PO Box 21365 San Juan PR 00928-1365, to provide a more specific recommendation.

Comment ID: 12/06/23_WP_PS_Go Sun Energy LLC_Ernesto Valle Quintana(1)

Comment: *"Dear members of the CDBG-DR program:*

I write to you regarding the 14th amendment to the CDBG-DR Action Plan for the recovery efforts related to Hurricanes Irma and María. Specifically, I would like to express my support for the allocation of additional funds to the ER2 program, which seeks to promote the reliability and resilience of the electric power supply in Puerto Rico.

I believe it is of paramount importance to increase the amount of money allocated to the ER2 program, and I suggest allocating a minimum of 50 million dollars per municipality for the development of microgrids. These grids would have a significant impact on a wide range of services, including health, critical facilities, utilities, low-income people, small businesses, battery storage, community education, as well as support for the mayors and their working teams.

The implementation of microgrids will allow for greater stability in the power supply, resulting in a substantial improvement in the quality of life of Puerto Rico's residents. In addition, it will improve the responsiveness to future emergency situations, ensuring that critical facilities and necessary services are available in times of crisis.

It is also important to note that these investments will contribute to the region's economic development. Encouraging the growth of small businesses and providing support for low-income individuals will yield a positive impact on the community as a whole.

As such, I urge you to consider allocating the additional funds necessary to support the development of microgrids in Puerto Rico. I am convinced that this strategic investment will have a lasting impact and benefit the island in its recovery process and to prepare for the future.

I thank you for your attention to this matter and trust that you will consider my request. I am at your disposal to provide any additional information or to join in any discussion concerning this issue.

Best regards,

*Ernesto Valle Quintana
Go Sun Energy LLC"*

PRDOH Response:

Greetings, Ernesto!

The Puerto Rico Department of Housing (**PRDOH**) appreciates the participation of Go Sun Energy LLC during the public comment period for the 14th (Substantial) Amendment to the CDBG-DR Action Plan.

The Electrical Power Reliability and Resilience Program (**ER2**) is one of the programs in the CDBG-DR Electrical Power Systems Enhancements and Improvements Action Plan, which is a separate grant from the funds awarded under the CDBG-DR Action Plan for the Recovery of hurricanes Irma and María. The ER2 Program is designed to provide funding for projects that qualify as an extension and improvement to Puerto

Rico's power grid. The program's main objective is to improve the reliability, affordability, and resilience of the electrical power system through the development and interconnection of projects that qualify as grid expansions and improvements. PRDOH will use strategic selection and competitive selection methods to select the energy projects to be funded, whereby each project will be evaluated based on the criteria established in the Program Guidelines. Projects chosen by strategic selection are those that provide a significant public benefit to Puerto Rico, while the projects chosen by competitive selection are those submitted by the Applicants to PRDOH through a competitive evaluation and selection process.

The ER2 Program is currently conducting the competitive selection process where eligible entities such as private for-profit utilities, nonprofit utilities, or public entities may submit their energy projects for evaluation and determination by the PRDOH team. Some of the potentially eligible types of projects include microgrid projects, virtual power plant projects, and distributed renewable energy generation projects, among others. The application period for the ER2 Program will be open until January 30, 2024.

As for your recommendation to increase the budget for the ER2 Program, PRDOH will take your request under advisement and assess the need to increase the Program's budget. However, please note that funding for each program is under constant review by the PRDOH team. Should the need arise to reallocate funds from one program to another, PRDOH will amend the Action Plan to ensure that the necessary funds are provided to strengthen Puerto Rico's power grid.

To learn more about the ER2 Program, visit the PRDOH webpage available in English and Spanish at <https://recuperacion.pr.gov/en/electrical-power-reliability-and-resilience-program/> (English) and <https://recuperacion.pr.gov/programa-para-la-fiabilidad-y-la-resiliencia-de-la-energia-electrica/> (Spanish). We also encourage you to visit the PRDOH webpage, available in English and Spanish, to learn more about the different energy programs, at <https://recuperacion.pr.gov/welcome/en/home/> (English) and <https://recuperacion.pr.gov/welcome/home/> (Spanish).

Comment ID: 12/06/23_WP_PS_LA CAUSA_Kianna L Figueroa Feliciano(1)

Comment: *“WORKFORCE TRAINING PROGRAM: The program has a budget of 90 million, of which 15 million have been used within 42 months of its implementation. At a rate of 363K per month, which is the average expense, we don't think that the budget will be used in its entirety over the remaining years. Therefore, we ask that a window be opened to receive new applications for programs that could contribute to the training of the Puerto Rican workforce. Thank you!”*

PRDOH Response:

The Puerto Rico Department of Housing (**PRDOH**) appreciates the participation of LA CAUSA during the public comment period for the 14th (Substantial) Amendment to the CDBG-DR Action Plan.

Currently, the Workforce Training Program has disbursed approximately \$15 million in assistance funds designed to provide eligible entities with funding to offer training in occupational skills related to the reconstruction and economic development of Puerto Rico. During its implementation, some of the projects subsidized by the Program suffered delays for various reasons, such as the COVID-19 pandemic and Hurricane Fiona, among others.

However, the PRDOH team is working to extend the assistance provided by the Program through the selection of additional subrecipients dedicated to training skilled construction workers. Currently, there is high demand for workers in the construction sector in order to implement construction projects. Consequently, PRDOH has modified the Program's narrative through the 14th Amendment to the CDBG-DR Action Plan to allow for the direct selection of subrecipients who will offer training programs for the development of skills in the construction sector to help the Island's recovery. To learn more about the Workforce Training Program, visit the PRDOH webpage, available in English and Spanish, at <https://recuperacion.pr.gov/en/workforce-training/> (English) and <https://recuperacion.pr.gov/capacitacion-laboral/> (Spanish).

Comment ID: 12/07/23_WP_I_Sheila Algarín(1)

Comment: *“Comment about the R3 Program: The maximum limit for awards in the Repair category should be increased from \$60,000 to an amount in the range of \$75,000 to \$90,000. This is because the funding for the R3 Program was increased, and to offset the higher construction costs, even for repairs considered minor. The cost of construction materials has risen sharply over the last 5 years. If a higher maximum award limit is projected for the Reconstruction and Relocation categories, why can't it be increased for the Repair category?”*

The amount of \$90,000 as a limit for the Repair category in the R3 program still represents less than half of the current limit for the Reconstruction category, which is \$185,000.”

PRDOH Response:

Greetings, Sheila!

The Puerto Rico Department of Housing (**PRDOH**) appreciates your feedback regarding the maximum award for repairs under the Home Repair, Reconstruction, or Relocation Program (**R3**) with CDBG-DR funds. Currently, the R3 Program offers a maximum award of sixty thousand dollars (\$60,000) for households that are eligible for repair. This limit is under constant review by the PRDOH team to ensure that it provides participants with an adequate amount to cover the costs of a repair project.

However, please note that the R3 Program makes exceptions for these limits on a case-by-case basis, as per the policies and procedures, so a repair participant could be eligible to receive a higher amount than the established award limit. To learn more about the R3 Program, visit the PRDOH page, available in English and Spanish,

at <https://recuperacion.pr.gov/en/r3/> (English) and <https://recuperacion.pr.gov/r3/> (Spanish).

Comment ID: 12/07/23_E_NGO_Centro para la Reconstrucción del Hábitat, Inc._Luis Gallardo(1)

Comment: "Hello, Carlos.

Recently, I mentioned that our recommendation is to include language in the VPR program to ensure that the program beneficiaries (the municipalities) will use such properties primarily for affordable housing. This in order to deter them, for example, from using the services/funds to acquire dozens of properties and then use them for purposes contrary to CDBG objectives.

After reviewing the 14th Amendment published in Spanish, we suggested some language changes so that its translation will be properly understood:

- Page 9, under PROGRAM ACHIEVEMENTS, fourth item: "...grow the inventory of affordable housing units that can also..."
- Page 9, under PROGRAM ACHIEVEMENTS, second item: replace the word commitment with involvement [we think this may be a better translation of the English version because of the context of the program.]
- Another item should be added stating: Provide technical and legal support to municipalities seeking to create affordable housing programs for low- and moderate-income people.
- Page 10, second sentence: replace "molestias públicas" with "estorbos públicos" [which is the translation for "public nuisances", *Berríos v. Mun. Juncos*, 31 D.P.R. 54, 61 (1922)].

Luis Gallardo Rivera
Executive Director
Centro para la Reconstrucción del Hábitat, Inc."

PRDOH Response:

The Puerto Rico Department of Housing (**PRDOH**) thanks Centro para la Reconstrucción del Hábitat, contributors to the Vacant Property Assessment (**VPA**) Initiative, for submitting their recommendations to the Vacant Property Recovery (**VPR**) Program proposed in the 14th (Substantial) Amendment to the CDBG-DR Action Plan.

The VPR Program is designed to help municipalities turn abandoned properties into opportunities for community resiliency through code enforcement, including the identification, notification, and declaration of public nuisances in accordance with applicable regulations. The Program will also provide assistance in training municipal

officials to handle vacant and abandoned properties through code compliance. It should be noted that eligible activities under the VPR Program are strictly limited to code planning and enforcement; therefore, no rehabilitation will be undertaken on structures determined to be public nuisances. Likewise, please note that the ultimate use of the identified vacant and abandoned properties cannot be determined through the VPR Program. However, modifications were made to the Program description considering your suggestions, such as in the "Program Achievements" section. Language was added in this section to reflect an interest in growing the inventory of affordable properties and providing training to help local governments become familiar with the best practices for the end use of such properties.

The PRDOH team is committed to ensuring community recovery and resiliency by actively addressing vacant and abandoned properties. We hope that the VPR Program will help minimize disrepair and neglect conditions in deteriorated areas while mitigating future deterioration and disrepair by combining code enforcement with planning and capacity building activities.

Additionally, we will consider your suggestions regarding the language in order to improve clarity in the next amendment to the CDBG-DR Action Plan. We appreciate your participation and thank you for your contribution to improving our communications.

Comment ID: 12/07/23_E_NGO_Hispanic Federation_Maritere Padilla Rodríguez(1)

Comment: *"Re: Comments from the Hispanic Federation regarding the Fourteenth Substantial Amendment to the Action Plan for the use of CDBG-DR funds"*

Dear Secretary Rodríguez Rodríguez:

On November 7, 2023, the Puerto Rico Department of Housing (Department of Housing) published the Fourteenth Substantial Amendment to the Action Plan for the use of CDBG-DR funds in response to Hurricanes Irma and María, hereinafter "Action Plan." Accordingly, the Hispanic Federation is submitting its comments on the amendment in due order.

I. COMMENTS AND RECOMMENDATIONS FOR PRDOH PROGRAMS

a. Vacant Property Recovery Program

This program aims to implement planning and code enforcement activities to address the situation of vacant and abandoned properties in order to turn them into resiliency opportunities for Puerto Rico's communities. The Hispanic Federation supports the objective of addressing and/or rescuing vacant properties in Puerto Rico. However, we hereby request that the program clearly and expressly establish the requirement that the recovered vacant properties must be used to address the shortage of affordable housing in Puerto Rico, which is an urgent and ever-growing concern.

- b. Home Repair, Reconstruction, or Relocation Program (R3)
 - i. Mitigation Alternatives

In our comments to the fifth, seventh, and ninth substantial amendments, we suggested that the R3 Program should allow participants to evaluate their mitigation alternatives at the household and the community levels. This, in order to avoid displacements. The alternative of rebuilding in high-risk areas must be evaluated responsibly on a case-by-case basis and at the community level. The safety of families is paramount, but relocation may not be the only alternative to achieve this safety in certain cases. Survivors and their communities should be aware of the mitigation alternatives that have been included in the Municipal Mitigation Plans, the State Mitigation Plan, and/or the mitigation projects contained in such plans. In fact, communities should be encouraged to participate in the process of designing, evaluating, and implementing these plans. Once survivors are aware of the mitigation alternatives for their homes and communities, they will have complete and objective information to be able to freely decide whether to stay or to relocate. Until such mitigation alternatives are responsibly evaluated, the Department of Housing may not impose household relocation as the sole alternative in at-risk areas.

[...]

In the proposed amendment, “[w]e removed language referencing the option to postpone the receipt of a relocation award under the R3 Program in order to participate in the Single Family Housing Mitigation Program (SFM), since the R3 Program offers alternative benefits, such as elevation, where feasible.”³In view of this proposal, we request that express assurance be given that the mitigation alternatives offered to R3 Program participants will be no worse or more limited than those offered under the Single Family Housing Mitigation Program. We also request that it be expressly required to evaluate and offer mitigation alternatives at the community level to avoid displacements.

- ii. Ownership

The Hispanic Federation reiterates its request to amend the Action Plan and the guidelines of the R3 Program to expressly provide that participants who sign an Ownership Certification and demonstrate a proprietary interest during the permit process but fail to obtain a perfected title will not be subject to collection action by the agency.

- iii. Temporary Housing

In our comments to the fifth, seventh, and ninth substantial amendments, the Hispanic Federation requested that the need for temporary housing be met for those applicants who wish to remain in their community while the mitigation alternatives are evaluated. [...]

Therefore, the Hispanic Federation reiterates its original comment and requests that a temporary housing alternative be created for R3 Program applicants whose home is not safe and who would like to wait for a mitigation alternative at the household or the community level.

- c. Community Energy and Water Resilience Installations Program

In the comments to the fifth and seventh substantial amendments, the Hispanic Federation recommended starting the program deployment in the areas where the electrical power system is most vulnerable. Especially where these services were restored last after Hurricane María. We also recommend: (1) using the funds for decentralized, rooftop, battery-powered solar energy systems that can operate during emergencies and provide critical life-sustaining power; (2) using equipment that is certified by the Puerto Rico Electric Power Authority to perform net metering, leaving it to the discretion of the beneficiary; (3) creating measures to cover the full cost of solar systems for families of low and moderate socioeconomic levels; (4) giving priority to people whose lives depend on devices such as artificial respirators or the equivalent; and (5) giving priority to communities with the greatest electrical vulnerability.

[...]

i. New Energy Program

This subprogram opened a round of application tickets in March of 2023 and ran out in just minutes. This proves the existing need and the subprogram's limited capacity to meet it. Therefore, the agency should provide assistance or guidance to those who did not satisfy the program requirements in order to steer them towards a program that will meet their needs. It should also establish mechanisms to ensure that the most vulnerable populations can obtain tickets in the following rounds. For example, by setting up centers in different areas where people can request a ticket in person.

ii. Incentive programs

This subprogram is designed to provide ongoing financing for installations in low and middle-income households, as well as incentives for households of up to moderate income to cover 30% of the project cost, up to \$15,000. The Department of Housing should continue prioritizing the installations in very low-income households, targeting the poorest and most vulnerable communities. We encourage you to keep using the New Energy Program charts until this need is met.

The agency should establish a maximum price at which renewable energy installation companies can sell per watt with storage included. This is in order to protect against inflation in the installation costs, which would render the incentive ineffective.

iii. Community Installations Program

The Department of Housing should look into any areas of high energy vulnerability that were not addressed by the U.S. Department of Energy's Energy Resilience Fund (ERF). It should also use alternative mass communication methods in addition to traditional media to give prior notice of the areas where these community installations will take place.

a. Blue Roof Survey Program

We urge the Department of Housing to take immediate, urgent, and concrete action to provide safe housing for the thousands of survivors who have waited more than six years for assistance and had to face Hurricane Fiona without safe shelter. [...]

iii. COMMENTS AND RECOMMENDATIONS TO ECONOMIC [DEVELOPMENT] PROGRAMS

a. Re-Grow PR Urban-Rural Agriculture Program

We urge the Department of Housing to take immediate, urgent, and concrete action to provide safe housing for the thousands of survivors who have waited more than six years for assistance and had to face Hurricane Fiona without safe shelter.

i. Education and Technical Support

We also recommend diversifying and bolstering efforts to provide technical support and assistance to the farmers and/or fishermen who receive the grants. There should be a greater number and more training of case managers and agricultural science experts to provide participants with the assistance they need in order to complete the business plan and post-grant compliance requirements.

ii. Creation of Priority Groups

The challenges and limitations faced by small-scale farmers and fishermen in completing the process of applying, complying with requirements, and accessing funds from the Re-Grow PR Urban-Rural Agriculture Program are publicly known. In order to address some of these limitations and ensure equity in the distribution of funds, we recommend creating additional priority groups to keep farmers with annual income under \$10,000 from having to compete on a 'first-come first-served' basis with farmers and entities that generate over \$50,000, \$100,000, or even \$150,000 per year. Likewise, we recommend that 100% of approved applications be for the benefit of farmers and fishermen who contribute to Puerto Rico's food security.

iii. Transparency Portal

We thank the Department of Housing for the data recently furnished to the Hispanic Federation. However, this data and all information pertaining to the program's compliance and impact should be published on the Transparency Portal of the Re-Grow PR Urban-Rural Agriculture Program. For example, this portal should contain the following information:

[...]

iv. GENERAL RECOMMENDATIONS REITERATED BY THE HISPANIC FEDERATION

a. Unmet Needs

We urge the Department of Housing to request the necessary data from FEMA and analyze it at the local and community levels in order to effectively identify the "Most Affected Areas" and unmet needs in Puerto Rico caused by Hurricanes Irma and María. This is the only way to achieve a fair distribution of the recovery funds.

b. Eliminate the repayment and fund-matching requirements

Many local nonprofit organizations lack the financial capacity to comply with the repayment and fund-matching mechanisms. Therefore, we recommend eliminating such requirements.

c. Citizen Engagement - Citizen Advisory Committee (CAC)

The Citizen Advisory Committee (CAC) was originally created to promote citizen engagement in both the CDBG-DR and CDBG-MIT Action Plans. Subsequently, and without reasonable justification, the Department of Housing restricted the CAC's jurisdiction to the CDBG-MIT programs. However, this does not relieve the agency of its public responsibility to ensure transparency, accountability, and citizen engagement in every action plan it implements. Therefore, we ask the Department of Housing to reinstate the CAC's jurisdiction over the CDBG-DR Action Plan.

v. CONCLUSION

The process of amending the Action Plan is an opportunity for the Department of Housing to improve the public policies adopted in said plan and its programs. The Hispanic Federation reiterates and has not withdrawn the recommendations submitted in previous comments that have not been addressed by the agency. We respectfully hope that the comments submitted herein will be useful.

Regards,

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PRDOH Response:

The Puerto Rico Department of Housing (**PRDOH**) appreciates the continued support and recommendations provided by the Hispanic Federation for the 14th (Substantial) Amendment to the CDBG-DR Action Plan. We acknowledge receipt of your feedback on the implementation of the CDBG-DR Programs and the CDBG-MIT Programs.

We appreciate the Hispanic Federation's support for the Vacant Property Recovery Program, whose purpose is to carry out code planning and enforcement activities to ensure that the situation with vacant properties is addressed, beyond their identification and classification, and turned into resiliency opportunities for Puerto Rico's communities. It is worth noting that the Program does not determine the ultimate use of the properties. However, the "Program Achievements" section has been modified to reflect our interest in growing the inventory of affordable properties and providing training to help municipalities become familiar with the best practices for the end use of such properties.

The Home Repair, Reconstruction, or Relocation Program (**R3**) provides applicants with the opportunity to do an elevated reconstruction if their home is located in a floodplain. According to the Program Guidelines, *"homes located in 100-year floodplains are eligible for elevated reconstruction if: 1) the estimated cost of repair is more than \$60,000 or 50% of the home's current appraised value, whichever is less; 2) the applicant has declined a relocation award; and 3) the model home will require less than 5 feet of elevation for construction purposes, in which case the elevated reconstruction is deemed reasonable."* Keep in mind that relocation assistance is voluntary, which means that the applicant may opt for either a reasonable elevated reconstruction while meeting the established federal and state criteria or a relocation voucher to acquire a suitable property outside the floodplain or high-risk area.

Regarding your comment about evidence of ownership, in accordance with Section 2.1.9.5 on standing, of Regulation No. 9473 of June 16, 2023, known as the "Joint Regulation for the Evaluation and Issuance of Permits related to the Development, Land Use and Business Operations" (**Joint Regulation**) of the Planning Board, the documentation evidencing ownership includes public deeds, registry certifications, declarations of heirship, title certifications from the Department of Housing, court judgments or resolutions, or any other documentation accepted by the Permits Management Office (**OGPe**, by its Spanish acronym), to be evaluated on a case-by-case basis.

PRDOH also provides applicants with alternative methods to prove ownership, including a process of ownership certification. PRDOH will refer applicants to the Title Clearance Program (**TC**), which was established to provide services to help the citizens affected by Hurricanes Irma and María legitimize their homeowner titles. Participants completing the permitting process by signing an Ownership Certification must follow the established procedures for perfecting the title under the TC Program. Please note that PRDOH is aware that a variety of circumstances outside the

participant's control may arise that could delay the process of acquiring a perfected title before construction is completed. This is why PRDOH states the following in the R3 Program Guidelines: *“Those cases of Applicants who signed an Ownership Certification and demonstrated property interest during permit transactions and still cannot obtain a clear title for reasons not attributable to the Applicant will be considered by PRDOH on a case-by-case basis,”* before proceeding with the recovery of subsidized funds. Likewise, PRDOH will adhere to the new Law No. 118-2023, known as *“Ley especial para acelerar los procesos para otorgar títulos de propiedad bajo el Programa de Autorización de Títulos adscrito al Departamento de la Vivienda”*, to meet the established requirements for the granting of perfected titles.

As for the temporary housing option, the R3 Program offers optional relocation assistance (**ORA**) for participants who need to vacate hurricane-damaged properties temporarily in order to allow for the execution of Program-sponsored activities and who have been unable to secure temporary housing. The Program provides assistance for rental, moving, or storage expenses to support a temporary relocation until the completion of Program-sponsored activities. To learn more about this type of assistance, please refer to the Optional Relocation Assistance Policy for PRDOH's CDBG-DR Program, available in English and Spanish, at <https://recuperacion.pr.gov/en/download/optional-relocation-assistance-policy/> (English) and <https://recuperacion.pr.gov/download/politica-de-asistencia-para-reubicacion-opcional/> (Spanish). Further information on the R3 Program services can be found on the program page, available in English and Spanish, at <https://recuperacion.pr.gov/en/r3/> (English) and <https://recuperacion.pr.gov/en/r3/> (Spanish).

In regard to the Community Energy and Water Resilience Installations Program (**CEWRI**) using CDBG-DR funds, PRDOH established this recovery program to provide photovoltaic energy systems and water storage systems to applicants who were already awarded assistance under the R3 Program. In other words, only R3 Program participants who have received an award for repair, reconstruction, or relocation will be eligible to participate in the Program.

However, PRDOH's CDBG-MIT Action Plan established the Community Energy and Water Resilience Installations Program, which comprises three subprograms: the Home Energy Resilience Improvements program (**CEWRI-HERI Subprogram**), more commonly known as the New Energy Program; the Incentive Program (**CEWRI-IP Subprogram**), more commonly known as the Solar Incentive Program; and the Community Energy and Water Resilience Installations Program (CEWRI-CI Subprogram). The Home Energy Resiliency Improvements (or New Energy Program) and Incentive (CEWRI-IP Subprogram) programs are designed under a single administrative structure known as the Community Energy and Water Resilience Installations Program - Household (**CEWRI-HH**). Both CEWRI-HH subprograms offer assistance for the installation of Photovoltaic Systems (**PVS**) with Battery Storage Systems (**BSS**) to meet the energy needs of eligible households. The CEWRI-HERI Program awards a maximum award of thirty thousand dollars (\$30,000), while the CEWRI-IP program awards grants of up to fifteen thousand dollars (\$15,000) or thirty

percent (30%) of the home project costs, whichever is less, to fund the installation of renewable energy systems. PRDOH will make an exception for participants residing in the municipalities of Vieques and Culebra, for whom grants will be capped based on the market conditions for the islands. It is worth noting that, prior to opening a round, an independent cost estimate is performed to verify the market costs for the systems. PRDOH uses this information to establish the Reference Costs for the round, which are included in the Round Reference Guide published on PRDOH's webpage to inform citizens before the opening of each round.

The CEWRI-HERI and CEWRI-IP subprograms launched ticket rounds designed to handle priorities, disbursement goals, and the capacity to process applications and install systems. As part of the implementation process, several outreach efforts were made to orient citizens on the requirements for admission to the program and the application process, among other details. In the first round for CEWRI-HERI (New Energy Program), the assistance was targeted to households whose income did not exceed thirty percent (30%) of the Area Median Family Income (**AMFI**). Meanwhile, PRDOH opened a single round for CEWRI-IP with a total of six thousand (6,000) tickets. The CEWRI-IP Program was designed by PRDOH, on the basis of recommendations submitted by citizens during the periods for public comment of previous amendments to the CDBG-DR and CDBG-MIT Plans, in order to provide incentives for households with incomes representing zero (0%) to two hundred percent (200%) the AMFI. The subprograms provided different methods for obtaining tickets to access the application process: citizens could sign up online through the Program's Application Portal, or by contacting the Call Center or visiting any of the ten (10) Intake Centers across Puerto Rico.

To PRDOH's understanding, many residents were unable to access the first round of the CEWRI-HERI Program due to the high volume of applications through the online portal and the call center. However, the number of tickets issued was determined taking into account the local market's capacity to supply and install systems.

PRDOH will soon open a second round to distribute tickets for low-to-moderate income households to benefit from the CEWRI-HERI Program services. PRDOH is committed to ensuring, through the CEWRI-HH subprograms, that priority is given to the most vulnerable families in the LMI population and to households at high risk for energy insecurity. Likewise, PRDOH will provide technical assistance and training on equipment use and maintenance to each Program participant. To learn more about the CEWRI-HERI Program, visit the PRDOH webpage, available in English and Spanish, at <https://nuevaenergia.pr.gov/en/> (English) and <https://nuevaenergia.pr.gov/> (Spanish). To learn more about the CEWRI-IP Program, visit the PRDOH webpage, available in English and Spanish, at <https://www.incentivosolar.pr.gov/en/index.html> (English) and <https://www.incentivosolar.pr.gov/> (Spanish).

Regarding your comment about the CEWRI-CI subprogram, the communities were selected with support from the U.S. Department of Energy (**DOE**), Sandia National Laboratories, and University of Puerto Rico, Mayagüez Campus (**RUM**, by its Spanish acronym). Similarly, PRDOH and DOE made coordinated efforts to avoid duplication of benefits while serving the most vulnerable communities. To learn more about the

CEWRI-CI Program, visit the PRDOH webpage, available in English and Spanish, at <https://recuperacion.pr.gov/en/cewri-ci/> (English) and <https://recuperacion.pr.gov/cewri-ci/> (Spanish).

As for the Blue Roof Survey Program, the properties identified through the surveys conducted by the program were referred to either the R3 Program under CDBG-DR funds or the Single-Family Housing Mitigation (**SFM**) Program under CDBG-MIT funds, as both programs are fully equipped to provide repair, reconstruction, and relocation assistance. PRDOH appreciates your recommendations regarding the Blue Roof Survey Program transparency portal and will assess the feasibility of providing the data requested.

Regarding the goal of reaching the low- and moderate-income (**LMI**) population of the Re-Grow PR Urban-Rural Agriculture Program (**Re-Grow Program**), please note that sixty percent (60%) of the beneficiaries assisted by the Re-Grow Program are classified as microenterprises, which have five (5) or fewer employees. Each Program participant must comply with the requirements of the national objectives, including the submission of documentary evidence of the assistance provided to the LMI population. As for your recommendation on providing education and technical support to applicants, we would like to point out that the Re-Grow Program provides assistance in obtaining farmer certifications, tax breaks, and additional benefits locally available to producers; assistance in farm management or operations efficiencies; and assistance in the application process, among other services, to ensure that applicants have the help they need to complete the application process. The Re-Grow Program has a team of case managers to provide applicants with these services throughout the process to make sure they submit the required documents and provide guidance for each phase of the Program.

The description of the Re-Grow Program in the CDBG-DR Action Plan states that small and medium-sized agricultural businesses that meet the definition of "small family farm" may be eligible to participate in the Program. The Program Guidelines also include a description of eligible small and medium-sized agricultural businesses as established by the United States Department of Agriculture (**USDA**). It should be noted that the Program's main objective is to promote and increase food security in Puerto Rico and improve and expand agricultural production linked to economic revitalization. For this reason, the Program Guidelines state that "*[d]uring the application intake period agricultural businesses engaged in food production will be prioritized. Priority applicants that submit all documents required will be reviewed for eligibility prior to reviewing eligibility for non-priority applicants.*" Non-priority applicants, meaning entities not engaged in food production, will receive a Non-Priority Applicant Notification and will be considered for a grant as long as funds are available. PRDOH is committed to first addressing the unmet needs of small and medium-sized agricultural businesses engaged in food production to ensure food security and promote the practice of sustainable agricultural activities in Puerto Rico.

As for the Re-Grow Program transparency portal, PRDOH will take your suggestions under advisement for future portal updates. However, the current figures show the number of active applications, cases determined to be eligible and ineligible, and

fund disbursements per municipality where participants are located, among other data, providing a comprehensive overview of the progress made through the Re-Grow Program.

PRDOH included an Unmet Needs section in the CDBG-DR Action Plan, which uses a variety of sources, including data collected by the Federal Emergency Management Agency (**FEMA**), to identify the most affected areas in Puerto Rico and learn about the unmet needs of Puerto Rican communities. However, let us reiterate that CDBG-DR funds are a last resort, which implies that PRDOH is responsible for maximizing the effective deployment of these funds by utilizing the recovery grant for its intended purpose, making the most of the available resources.

Regarding your comments on the Citizen Advisory Committee (**CAC**), we must point out that PRDOH created the CAC in accordance with the requirements established in Federal Register Vol. 84, No. 169 (August 30, 2019), 84 F.R. 45838, published by the United States Department of Housing and Urban Development (**HUD**). In 84 FR 45838, HUD requires each Recipient of CDBG-MIT funds, in this case PRDOH, to establish a committee, *"to provide increased transparency in the implementation of CDBG-MIT funds, to solicit and respond to public comment and input regarding the grantee's mitigation activities and to serve as an on-going public forum to continuously inform the grantee's CDBG-MIT projects and programs."*

Based on this federal requirement, PRDOH also developed the Citizen Advisory Committee Operational Guidelines to describe the CAC's structure and responsibilities. Regarding the CAC's participation in matters relevant to CDBG-DR funds, PRDOH has provided several public forums, such as the period of thirty (30) days for public comments for each substantial amendment, where citizens and interest groups can provide their feedback and recommendations for the implementation of these programs.

Comment ID: 12/07/23_E_NGO_FURIA, Inc._Nayda Bobonis Cabrera(1)

Comment: *"Hello.*

Our organization, Firmes, Unidos y Resilientes con la Abogacía, Inc. (FURIA), deems it appropriate to submit our comments regarding the Draft 14th Amendment to the CDBG-DR Action Plan for your consideration. FURIA is a nonprofit organization that has been directly involved in the recovery of vulnerable communities in Puerto Rico since 2018, through community organizing services, support, participatory advocacy, and community legal services, in more than 30 municipalities. In this journey alongside the communities we serve, we have witnessed the performance and progress of proposed projects for the recovery of Puerto Rico. Also, in close collaboration with the community leadership, we have gathered feedback on their primary needs during this process of recovery and building strong and sustainable communities.

In particular, the need for affordable housing in the country and the importance of ensuring that all available resources are leveraged for true resilient recovery in our communities are recurring topics of discussion between us and other organizations. That is why the creation of a new "Vacant Property Recovery (VPR) Program" in this amendment to the CDBG-DR Action Plan has caught our attention. According to the description in the draft, this program would seek to provide "municipalities with support to ensure that the situation with abandoned properties goes beyond classification and inventory and that it will be addressed and turned into resiliency opportunities for Puerto Rico's communities through the implementation of code enforcement activities." However, our major concern is that the program description in the proposal fails to show how the activities and initiatives it promotes will directly address the country's need for affordable housing.

The inventory launched by the Vacant Property Analysis (VPA) Program is more than useful for the recovery and transformation of abandoned spaces into decent, fair, and affordable housing spaces. Therefore, if this VPR program is the next stage of the VPA, it is crucial that it be explicitly designated and prioritized for the transformation of these spaces into affordable housing for the most vulnerable populations, including those who have not had the opportunity, since Irma and Maria, to get a safe roof over their heads and remain in the lists of programs such as R3. This would ensure that the reconstruction would help to address worthy issues such as homelessness, home loss due to natural disasters, foreclosures, and inflation in housing costs, among other hardships faced by much of our population. We are concerned that the eligible activities proposed in the draft do not establish a regulatory framework for the funds that promotes housing as the ultimate purpose of the disused property management programs.

Accordingly, we recommend that the eligible activities and the program description specify that any planning for the future use of these vacant properties should be focused on the objective of providing affordable and decent housing for those who need it. Furthermore, if it is possible that some of these properties may not be suitable for residential use, we urge that a community consultation process be implemented so that alternative uses can be proposed. For example, these spaces could be used for the construction of infrastructure such as community resilience centers, which are considered in the Community Revitalization Program and are critical to achieving true resilience. In fact, the planning and construction of both affordable housing and community resilience centers need to be a governmental priority to address future weather events, among other possible emergencies.

We will be following up on this amendment to the CDBG-DR Action Plan and remain at your service for any questions or comments regarding our position on the draft. As always, we can be reached at furia.puertorico@gmail.com or 787-210-6189.

Respectfully,

Nayda Bobonis Cabrera, Esq.

Executive Director"

PRDOH Response:

The Puerto Rico Department of Housing (**PRDOH**) appreciates the participation of the organization Firmes, Unidos y Resilientes con la Abogacía, Inc. (**FURIA**) during the public comment period for the 14th (Substantial) Amendment to the CDBG-DR Action Plan.

The proposed Vacant Property Recovery (**VPR**) Program is designed to implement code planning and enforcement activities, thus ensuring that the issue will not be limited to its identification and classification, but will be addressed in a comprehensive manner, turning it into resiliency opportunities for Puerto Rico's communities. The VPR Program also provides training and support to local governments to reach a resolution in terms of code enforcement.

Although PRDOH supports the conversion of vacant and abandoned properties into affordable housing projects, it is important to note that the VPR Program is intended to implement activities that are eligible under the Housing and Community Development Act of 1974 (**HCDA**). Also, please note that the ultimate use of the properties is not determined by the VPR Program. However, PRDOH modified the Program description, specifically in the "Program Achievements" section, to include language that reflects our interest in growing the inventory of affordable properties and providing training to help municipalities become familiar with the best practices for the end use of such properties.

PRDOH is committed to addressing the issue of vacant and abandoned properties to ensure community recovery and resiliency. We hope that the VPR Program will help minimize the disrepair and abandonment of properties while mitigating future deterioration and disrepair.