

PUERTO RICO

DISASTER RECOVERY ACTION PLAN

PUBLIC COMMENT

9.21.18 – 10.21.18



CONSTRUIMOS 

Foreword

Public comment on the draft Action Plan with the Substantial Amendment was received in Spanish and English. Each comment submitted is available in its entirety, in the language(s) and format it was submitted in, at www.cdbg-dr.pr.gov and as an appendix to the Action Plan.

Comments submitted have been summarized here in Spanish and English as a convenience to the reader. Quoted sections of individual comments may consist of paraphrases due to translation or for brevity. Personally identifiable information (PII) has been redacted from all comment to protect the privacy of the commenter. Please refer to the text of the submitted comments for further information.

You may contact PRDOH for a full translation of an original comment or to request alternate accessible means or formats to access public comments and PRDOH responses. Requests can be made via the following methods:

- Via telephone: (787) 274-2527
- Via email at infoCDBG@vivienda.pr.gov
- Online at <http://www.cdbg-dr.pr.gov/contact/> or <http://www.cdbg-dr.pr.gov/contacto/>
- In writing at:

Puerto Rico CDBG-DR Program

P.O. Box 21365

San Juan, PR 00928-1365

Public Comment

Comment: #001-09-22-18_José Dolores Díaz Rivera

"Starting in February 2018, I requested assistance from the Tu Hogar Renace program because my house had been damaged by Hurricane María. My case was approved When the company came to make repairs they only dealt with sealing the roof, delivering a new refrigerator and repairing the window operators. The zinc roof of my laundry room did not qualify for repairs according to the company's inspectors. FEMA assigned me some money and I have bought materials to repair the cement roof and the laundry roof. I would like my case to be evaluated to see if I qualify for the allocation of funds assigned by the Federal Government."

PRDOH Response: Information currently available regarding the Home Repair, Reconstruction, or Relocation Program and other CDBG-DR housing programs is available in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, as they become available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #002_09-22-18_Ted Norbett

"Does the recently approved and funded CBDG-DR of FEMA program include Solar electric power systems and materials?"

PRDOH Response: Information regarding the initial phase of the Community Energy and Water Resilience Installations program, which may include solar power, is available in the Action Plan. More specific guidelines will be developed after HUD approves the program. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #003_09-24-18_Ana H. De Jesús Laboy

"I would like to have some information about the cdbg-dr program, I was affected by Hurricane María and someone talked to me about this program. Thank you very much, I hope you can help me."

PRDOH Response: Information currently available regarding the Home Repair, Reconstruction, or Relocation Program and other CDBG-DR programs is available in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, as they become

available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #004_09-24-18_Betsy Acosta

"I would appreciate guidance about how to register to qualify for home reconstruction funds, since the newsletter does not indicate what to do and where to go and I know the funds are already available because I saw it on the televised news. I hope you can give me information."

PRDOH Response: Information currently available regarding the Home Repair, Reconstruction, or Relocation Program and other CDBG-DR programs is available in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, as they become available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #005_09-24-18_Jenny Napolitan

"I would like to have more information about starting a family business of one of two types: one is yard work, which my husband does and the other is arts and crafts, after losing everything during María, we are working to recover little by little but honestly it is not easy to get a regular job with 4 girls in three different schools!"

PRDOH Response: The Small Business Financing, the Small Business Incubators and Accelerators programs, and other Economic Recovery Programs outline opportunities for small businesses. Information about the program can be found in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, as they become available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #006_09-24-18_Miguel Romero (San Juan District Senator)

"Last Friday we conducted a meeting in my office with members of "Vecinos de la Laguna del Condado en Acción" [Residents of Condado Lagoon Neighborhood in Action], composed of residents and businesses of that area, which is located in the Municipality of San Juan. This community group was created with the aim of improving quality of life, health and security in the community in the aftermath of Hurricanes Irma and María. It is important to note that this group represents a great number of residents and businesses in the area. Additionally, Condado is a highly touristic area and is important for the economic development of San Juan and Puerto Rico.

As part of our commitment to serving the interests of our constituents in the community and to help them have their demands addressed, we are including a copy of a communication presented for "Vecinos de la Laguna del Condado en Acción." The purpose of the message is that the projects

and initiatives mentioned be evaluated and considered on their merits in the Action Plan for the administration of funds from the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant-Disaster Recovery Program (CDBG-DR). Similarly, this community group has contacted several state and federal agencies in search of solutions for identified problems.

I am interested in collaborating with this community group. For this reason, I am formally requesting a meeting with you or with the person in charge of evaluating the attached initiatives within our Administration's Action Plan. The purpose of this meeting would be to discuss these and other matters related to the Condado community and how they can implement the initiatives that will be beneficial not only for the community, but also for the economy, since they will impact an eminently touristic area. To arrange this meeting, you may call Mrs. Yarityz DelaTorre at [phone] or email her at [email]."

PRDOH Response: PRDOH values the participation of all municipios and community groups and looks forward to a working relationship at the municipal level throughout the life of the grant. Programs which will be administered with partners or subrecipients are outlined in the Action Plan. Information regarding the Whole Community Resilience Program, which was designed as an avenue for citizens in vulnerable communities to actively participate in decision-making related to the creation of resilient, whole-community solutions, is available in the Action Plan.

Comment: #007_09-24-18_Sara López

"Among the programs, could you tell me if any of them assigns funds to non-profits that need to cover labor costs?"

We have materials provided by FEMA, but need funds to pay the contractors.

I would appreciate any information."

PRDOH Response: Non-profits are eligible applicants to several programs outlined in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, as they become available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #008_09-25-18_Jorge L. Vazquez

"I am from Guayama, I would like to know where I can apply."

PRDOH Response: Information currently available regarding CDBG-DR programs is available in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, as they

become available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #009_09-25-18_Marisel Muriel Román

"Attached are photos of the location of my home. There were mudslides at the top and the bottom of the property and I need to be relocated.

I would like to know if the Department of Housing has a program that can help me."

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for voluntary relocation. Information about the program can be found in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, as they become available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #010_09-25-18_Magdamarie Crespo (Carolina Building Materials, Inc.)

" We are a company dedicated to the sale of structural steel and miscellaneous construction materials and we would like to know how to register to participate in bids and/or requisitions. We would also like to know how we can bid in the program.

I would appreciate any information,"

PRDOH Response: All Requests for Proposals will be posted to www.cdbg-dr.pr.gov. Organizations interested in providing services should monitor the procurements page of the website for opportunities.

Comment: #011_09-25-18_SLB

"I already downloaded the action plan and I am looking it over so I can make my comments. Thank you very much."

PRDOH Response: Thank you for reviewing the Action Plan with its Substantial Amendment. PRDOH will take your comments into consideration during further development of programs outlined in the Action Plan.

Comment: #012_09-26-18_Ineabelle Ortiz

"I understand that you will be offering assistance for this situation. Is that correct? Is there a limit? What information and/or documents should I provide?"

PRDOH Response: Information currently available regarding CDBG-DR programs is available in the Action Plan. Further definition regarding application periods, documentation and

process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, as they become available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #013_09-26-18_Margarita Berrios

"I recently heard the secretary report that they already have the funds for constructing or repairing residences with blue carps.

I would like to receive more information about this and about who I should contact to apply. I would appreciate your help with this."

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for housing repair, reconstruction, and relocation. Information about the program can be found in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

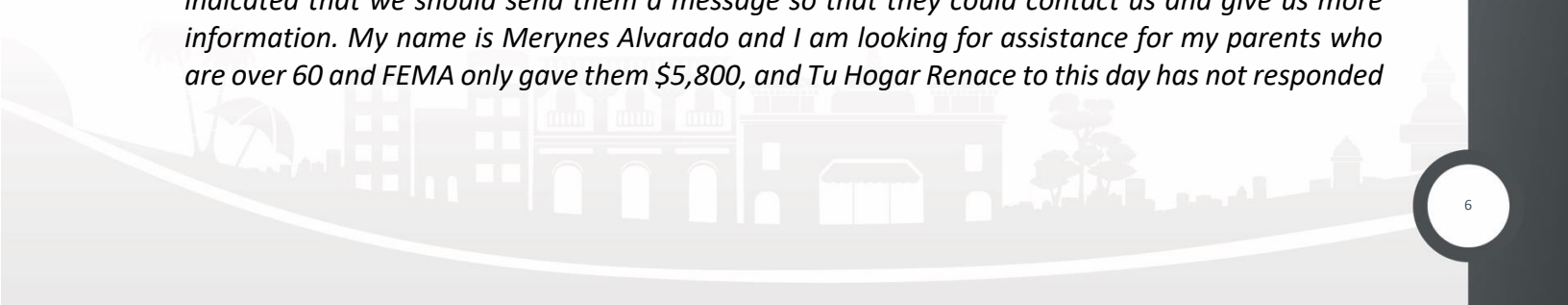
Comment: #014_09-26-18_María Rodríguez

"A few weeks ago I went to the Department of Housing and they talked to me about this program, since I did not qualify for the materials assistance program... I would like to know how to apply and if I qualify for this program. My home was damaged by the hurricane and I decided to rebuild the house in cement even though FEMA approved only two-thousand dollars, but I am having a lot of difficulties because the materials are very expensive and I have limited economic resources... I would love to receive a list of the documents that I will need so that I can start gathering them."

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for housing repair, reconstruction, and relocation. Information about the program can be found in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #015_09-26-18_Merynes Alvarado

"Today at the Department of Housing they gave us information about these programs and indicated that we should send them a message so that they could contact us and give us more information. My name is Merynes Alvarado and I am looking for assistance for my parents who are over 60 and FEMA only gave them \$5,800, and Tu Hogar Renace to this day has not responded



and their little house is in a deteriorated state, their little house is made of wood and zinc. If possible, I would like you to give us information about the application we need to fill out in relation to home repairs and reconstruction. You may contact Wanda Sánchez, the owner... or Merynes Alvarado, her daughter..."

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for housing repairs, reconstruction, and other CDBG-DR programs are available in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, as they become available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #016_09-27-18_Prof. Dámaso de Jesús (UPR Ponce)

"I am writing to you since I made the call and I was told that you could send me information through email about the status of the proposals submitted by the University of Puerto Rico in Ponce. As we were unable to present at the Public Hearings held at the Old Casino in Ponce, the proposals were submitted through this email, as per the instructions they gave us when we attended. However, to this date we have not received any response, whether they were approved or not. The first one was related to the Creation of a Suicide Prevention Center. The second was about the creation of a Learning Skills Center.

I would appreciate any information you can provide about this matter or about whom I should contact for said information."

PRDOH Response: Thank you for your comment. PRDOH will take this into consideration during further development of programs outlined in the Action Plan.

Comment: #017_09-27-18_Felipe Lebrón

"I would appreciate discussing with an agency official the Energy Resiliency program for apartments rented to low-income tenants. For example, for the installation of gas appliances, solar water heaters, etc., so that these low-income families can continue to occupy their apartments in case of lack of electricity service.

I would appreciate that you contact me to arrange a meeting or orientation."

PRDOH Response: The Community Energy and Water Resilience Installations program was designed to provide eligible homeowners and renters with options for home energy resilience. Information about the program is available in the Action Plan. More specific guidelines will be developed and posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #018_09-27-18_Frances Ruis Vega

"We are including for appropriate action the email received through the webpage info@vivienda.pr.gov"

Attached to email: Resume of Frances Ruis Vega (Clinical Social Worker)

PRDOH Response: Parties interested in employment opportunities available with PRDOH should contact the PRDOH Human Resources Department.

Comment: #019_09-27-18_Ivan Pacheco

"I am interested in housing construction work and this is my information..."

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for housing repairs, reconstruction, and other CDBG-DR programs is available in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, as they become available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #020_09-27-18_Lizzie Rosso (Condado Lagoon Neighbors in Action)


"...We are therefore re-submitting our comments to the original plan and requesting that the Condado Lagoon Revitalization Project be adopted and added as a new program to the Action Plan. This high priority project addresses the long-term recovery, restoration of infrastructure and economic revitalization of a HUD designated "most impacted and distressed area" (MID) which is of significant importance for the Island's economic development.

The Condado Lagoon Revitalization Project is a community led effort that seeks to leverage the natural beauty of one of the Island's most strategically located natural estuaries to spark tourism and economic development by addressing the impact of flooding and hurricane related damages to critical infrastructure on the local people, businesses and environment. We envision that the Condado Lagoon Revitalization Project will directly impact the immediately surrounding

Condado Tourist District, Convention Center District, Miramar Neighborhood and San Juan Harbor which are some of the Island's top tourism assets."

The attachment also includes an "About Us" section as well as an "Assessment of Unmet Needs" and "Comments pertaining to the work that will be funded with CDBG-DR grant money."

PRDOH Response: Information regarding the Whole Community Resilience Program, which was designed as an avenue for citizens in vulnerable communities to actively participate in decision-making related to the creation of resilient, whole-community solutions, is available in the Action Plan. More detailed information regarding the Whole Community Resilience Planning program will be published as part of the program guidelines, which will be available at www.cdbg-dr.pr.gov.



Comment: #021_09-27-18_Maribel Castillo

"The presentation does not mention anything with respect to solving future flooding, the sources that created the flooding need to be found in order to avoid having the same problems in the future. The way of [providing properties by exchange] is not appropriate and borders on unconstitutional. Related communities should manifest their demands by voting on any proposal made by the municipality, so that citizens' wishes are addressed. For closing costs and other products there are the banking institutions and the federal housing department. There is a need to seek transparency. In terms of the other proposals made by the municipality, they are appropriate."

PRDOH Response: PRDOH appreciates that disaster recovery requires a multi-faceted approach, which includes incorporation resilience measures to the greatest extent possible in CDBG-DR funded projects. PRDOH is committed to leading a transparent recovery effort. Information related to programs implemented, including information regarding expenditure of funds and procurement, will be posted to www.cdbg-dr.pr.gov as it becomes available, as required by 83 FR 5844 and 83 FR 40314.

Comment: #022_09-27-18_Mary Flores (Fenix Construction Services Corp.)

"My name is Mary Flores, President of Fenix Construction Services Corp. I am from the town of Adjuntas, PR. I own a construction company that is in compliance with all the permits and insurances required by the laws of Puerto Rico. Currently, I work for Tu Hogar Renace in temporary assistance in the towns of Jayuya, Utuado, Lares, and Ponce. I am proud and satisfied to say that mine is one of the companies that passes all the final inspections in the projects we work on for Tu Hogar Renace. You can confirm that with SIS.CO, since I work for them as a subcontractor. I would like to know how my company, FENIX CONSTRUCTION SERVICES CORP. can participate directly with you in the upcoming new stage of PERMANENT ASSISTANCE. I am attaching my fliers and my proposal with the exact contact number and address."

PRDOH Response: Information regarding procurement, including Requests for Proposals (RFP), will be posted to www.cdbg-dr.pr.gov. PRDOH encourages interested parties to monitor the website for opportunities.

Comment: #023_09-27-18_Nilda Rivera

"I would like to know the requirements for restoring a house, where I have to go and how this program works."

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for housing repairs, reconstruction, and other CDBG-DR programs is available in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program

guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, as they become available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #024_09-27-18_Ricardo Gallego

"Because Hurricane María destroyed my house and the place is dangerous and my mom lives with me and she is sick, cannot walk anywhere because there is a river and there is no bridge."

PRDOH Response: Information regarding Housing Programs, Infrastructure Coordination, and other related CDBG-DR programs are available in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, when available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #025_09-27-18_Rachel Geilenfeld (Sukup Manufacturing Co.)

"I am reaching out at the suggestion of Tony Mendes, a Senior Emergency Management Specialist in FEMA Region VIII. He suggested there may be some need for temporary housing structures in North Carolina or Puerto Rico. Sukup Manufacturing Co. is a family-owned company based in Iowa, which primarily manufactures grain storage and grain handling equipment. We also manufacture a product called the Safe T Home. More info at www.SafeTHome.com.

Some features:

- *100% of the homes withstood Category 4 Hurricane Matthew in 2016 (200 in Les Cayes, Haiti, at the time)*
- *100% sustainable materials*
- *Ship 10/container*
- *6 hours to construct, 2 hours to tear down*
- *75 year life*
- *379 square feet of interior space*
- *Lockable windows and doors*

I would be happy to provide more information or connect via phone."

PRDOH Response: Information regarding procurement, including Requests for Proposals (RFP), will be posted to www.cdbg-dr.pr.gov. PRDOH encourages interested parties to monitor the website for opportunities

Comment: #026_09-28-18_Nilda Rivera

"What I would like to know is that I have heard that if there is an abandoned house you take pictures of it and take them to the department of housing and if your application is approved you can keep that house for yourself, if that is that true of this program or not."

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for voluntary relocation. Information about the program can be found in the Action Plan. Further definition regarding application periods, documentation and process used to prove eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, as they become available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #027_09-28-18_Xavier Ortiz-Mangual (AirQuest Environmental, Inc.)

"My name is Xavier Ortiz-Mangual, representative of the environment consulting firm AirQuest Environmental, Inc. I am writing because we are interested in knowing if, as is usually the case with federal bids, there is a list of vendors interested in the CDBG Program bids. We are especially interested in bidding for CDBG-DR-RFP-2018-03 (Environmental Consulting Services)."

PRDOH Response: Information regarding procurement, including Requests for Proposals (RFP), will be posted to www.cdbg-dr.pr.gov. PRDOH encourages interested parties to monitor the website for opportunities.

Comment: #028_09-28-18_Juan A. Marrero-Santiago (MARCO Federal Services, LLC)

"We are a 8(a) SBA Certified General Contractor that will like to participate in the procurement process for the community development block grant disaster recovery program. We will like to be part of the resilience effort of the Island. Please let us know where we can obtain more information about it."

PRDOH Response: Information regarding procurement, including Requests for Proposals (RFP), will be posted to www.cdbg-dr.pr.gov. PRDOH encourages interested parties to monitor the website for opportunities.

Comment: #029_09-28-18_Rosalyn J. Torres

"Being a single Action Plan and this being a significant amendment to it I have several observations:

1. The Congress requires that there be an alignment between the 12 and 24 month Economic and Disaster Recovery Plan of Puerto Rico as required by Section 21210 of Public Law 115-123, the Fiscal Plan of Puerto Rico (duly approved by the Board of Fiscal Control (PROMESA) and eligibility for the CDBG-DR grant. The first disbursement did not have such alignment, therefore, being an amendment and not a different plan, it must govern the entire plan and not only the amount, that is, that the requirement of alignment with the courses of action established in the economic recovery plan that the Governor submitted to the Congress of the United States of America must

exist for the three disbursement items that the Plan proposes and not only for This disbursement only as established in this document, I reiterate that it is an amendment, I make this proposal because the document textually mentions that these amendments do not affect the previous item. This must be corrected.

2. The Fiscal Plan that is consistently referred to in the amendment is not the Fiscal Plan Approved by the Fiscal Control Board, it is only the Fiscal Plan submitted by the Governor of Puerto Rico to the Fiscal Control Board and not approved by the Fiscal Control Board (PROMESA). These references must be corrected to cite the approved fiscal plan and not the fiscal plan submitted.

3. There is no opportunity in the English version to make comments, excluding citizens who do not speak, read or write Spanish to be able to express themselves at this stage of public consultation.

4. As it is in the case of Federal funds to Federal agencies, there must be a requirement to the government of Puerto Rico to obligate CDBG-DR funds to cover the costs of a permanent Office of the Inspector General (OIG) of the US government to ensure compliance and promote the responsible use of CDBG-DR funds in Puerto Rico with representation of the OIG in each agency responsible for managing these funds.

5. Since education and innovation are critical areas for the development of communities and economic development of PR, the University of Puerto Rico should have greater participation in the administration of funds for economic development planning as well as the Puerto Rico office for Innovation and Technological Services (PRITS), which is not even mentioned in the document. In addition to the fact that 44 municipalities are coastal and that the protection of these rests mostly on natural resources of public domain, and that the vast majority of the citizens living in these areas are disadvantaged communities, there is no mention of allocation of funds to be administered by the Department of Natural and Environmental Resources of PR. This should be reviewed so that the agencies with greater knowledge and jurisdiction in these areas have the capacity to address priority issues for the development of PR communities.

6. In ALL areas of unmet needs, the Federal Agencies with jurisdiction and/or with the expertise in overseeing or evaluating projects should be consulted in order to ensure the best possible investment of US tax payer's monies."

PRDOH Response:

The Fiscal Plan for Puerto Rico and the Disaster Recovery Plan of Puerto Rico were reviewed for consistency with the Action Plan and its Substantial Amendment. Please refer to the "Recovery Plan Alignment" section of each program listed in the Action Plan for detailed information on how each program aligns with the Disaster Recovery Plan of Puerto Rico.

During the development stage of the Action Plan and its Substantial Amendment, the Fiscal Plan for Puerto Rico was not yet approved. PRDOH has taken this comment into consideration.

PRDOH accepted comments in English or Spanish during the Public Comment stage of the Substantial Amendment.

As CDBG-DR grantee, PRDOH, and any of its partner agencies or subrecipients are subject to monitoring by the Office of the Inspector General (OIG). However, the OIG is not funded by PRDOH.

Thank you for your comment. All partner agencies, including the University of Puerto Rico, are outlined in the Action Plan. Opportunities for and eligibility criteria for potential subrecipients are also outlined in the Action Plan.

A full list of data sources used in formulation of the unmet needs assessment is included in the appendices of the Action Plan.

Comment: #030_09-30-18_ David Sotomayor

“How can I request aid. My home is in Ingenio Ward, Toa Baja.”

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for housing repairs, reconstruction, and other CDBG-DR programs are available in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, as they become available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #031_10-01-18_ Rosario M. Villanueva Bravo (Director of Federal Programs, Municipality of Isabela)

“We want to know the status of the assessment submitted in August by our Municipality of Isabela and what decisions have there been with regard to the CDBG-DR Funds.”

PRDOH Response: All municipios will be notified directly of the results of capacity assessments. PRDOH values collaboration with municipios and looks forward to an ongoing positive working relationship with municipal stakeholders.

Comment: #032_10-01-18_ Eleison Tirado

“I hereby inform you that I read the document about the speech on federal funds for the Municipality of Ceiba.

I have some questions about the Hacienda Las Lomas Project in Ceiba, because I live there and the document about the speech mentions that neighborhood.

What is going to be done with the residents?

Were the funds approved?”

PRDOH Response: Projects proposals submitted by municipios informed program design during the development of the Action Plan and substantial amendment to the Action Plan. Municipios are eligible to apply to the City Revitalization Program, outlined in the Action

Plan, which provides funding for a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #033_10-01-18_Socorro Pastrana Fontanez

“How can one request the construction of a house that was destroyed by Hurricane Maria? The property is located in Cambalache Ward, Canovanas. The house is uninhabitable. I have the property title for the lot of land.

Please tell me where I should go or apply.”

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for voluntary relocation. Information about the program can be found in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, as they become available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #034_10-01-18_Obed Santiago-Gallego (SanRos Field Services)

“We at SanRos Field Services are happy to offer you our experience in building homes that hold up against winds over 175 m.p.h., are waterproof (flood proof), and best of all, we can do it in a short time. Faster than normal construction.

We would like to give you a presentation on these units.”

PRDOH Response: Information regarding procurement, including Requests for Proposals (RFP), will be posted to www.cdbg-dr.pr.gov. PRDOH encourages interested parties to monitor the website for opportunities.

Comment: #035_10-01-18_Marilin González (Rodríguez and Garland, Inc.)

“Rodríguez and Garland, Inc. is a General Construction Company that covers all the Puerto Rico and US Virgin Islands. We have experience working for Federal Agencies, Pharmaceutical, Manufacture Industries and commercial projects.

We currently are certified as a 8(a) and SDB Own Small Business by the US Small Business Administration. Also, we are available for sole-source contracts under the 8(a) SBA Program (FAR 19.808-1). We currently accept all major credit cards used by the federal government.”

Attach you will find our company profile to be considered as an alternative to perform your current and future projects. If you need additional information of our service, feel free to contact Eng. Eddie Figueroa at ..., Eng. Gabriel Rodríguez at ... or Ms. Marilin González at”

PRDOH Response: Information regarding procurement, including Requests for Proposals (RFP), will be posted to www.cdbg-dr.pr.gov. PRDOH encourages interested parties to monitor the website for opportunities.

Comment: #036_10-02-18_Armando J. Rodríguez (Grupo HIMA San Pablo)

“As stated on the Disaster Recovery Action Plan (DRAP) presented by your Administration and approved by the U.S. Department of Housing and Urban Development (HUD) on July 29, 2018, the negative impact of Hurricane Maria on health services on the Island has been enormous. By citing other sources, the DRAP report indicates that the mortality rate in Puerto Rico increased by 62% between September 20, 2017 and December 31, 2017, and it was caused mainly by the interruption of medical services by many facilities that were forced to close due to lack of power, and drinking water, among other sources. The DRAP, describes the Island as medically underserved, and determines that its health system suffer a deficiency of specialized services and intensive care units per capita, when compared to the Mainland US. The report adds that the Island does not have a burn unit in its hospitals. While there is one advanced burn unit run by Hospital HIMA San•Pablo Caguas, it is not sufficient to serve the demand for the entire Island.

In essence, the Puerto Rico's Disaster Recovery Action Plan depicts its health system in serious circumstance that calls for becoming a priority when determining the allocations of CDBG-DR funds. In order to address the above-mentioned deficiencies, we strongly believe the Government of Puerto Rico, through its Department of Housing, must support initiatives that can address the recovery of the damages in the short run, and to bring up-to standards the accessibility of advanced and specialized medical services to its citizens in the long run. Therefore, in the interest of improving and creating a resilient health care system in Puerto Rico, we ask that you request HUD to include similar language as suggested below into the pending CDBG-DR guidelines as per the Federal Register Notice published in August 14, 2018.

"Eligible economic revitalization activity may include allowing for acute care hospital facilities, ranging from large teaching institutions to small rural critical access hospitals, to have access to grants or affordable financing for remodeling, expansion, modernization, equipment, refinancing mortgage debt, and acquisition. These related activities should be prioritized to existing health care providers, particularly those hospitals with existing specialized medical units"

These authorized activities will have a direct consequence to contribute to the long-term recovery and restoration of the health system in most impacted and distressed areas. Savings from refinancing mortgage interest rates shall be used to address the following:

- 1. Incorporating mitigation and resilience measures to protect the health program against the anticipated effects of future natural disasters.*
- 2. To promote economic revitalization by attracting and retaining health-related business and jobs that will improve advanced and specialized medical services in most disaster-impacted areas. The Healthcare industry is a significant sector in Puerto Rico, and with your support we will overcome the challenges we are facing today."*

PRDOH Response: Thank you for your comment. PRDOH will take this into consideration during further development of programs outlined in the Action Plan.

Comment: #037_10-02-18_Brian Perez (On Point Strategy)

“I am writing to you because we recently met with the municipality of Yauco and the following questions have come up:

- *Some residents have sold their homes after the hurricane and we would like to know what would happen in those cases. Buy a new home or rent. They would not qualify for the voucher program. Check the draft of the new allocation and see if they can participate in some other program.*
- *Does the Housing Department have the list of residences that participated in the Tu Hogar Renace Project in the municipality of Yauco? There should be one. I did not participate in the program.*
- *The mayor is not clear about the selection process for the projects because the municipal police station was chosen and was submitted, but as a low priority. Chosen for what? The RFP guidelines for the programs have not been published yet. The guidelines allow proposals to be submitted.*
- *The construction of the aqueduct in the mountain. Will PRASA be working on it? I don't know.*

Once again, we appreciate your collaboration and we are at your service.”

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for housing repairs, reconstruction, and is available in the Action Plan. The Community Energy and Water Resilience Installations program outlines opportunities for resilience installations and is also available in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, as they become available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Tu Hogar Renace is a separate program and is not included in this Action Plan. For more information regarding this program, please visit www.tuhogarrenace.com or call 1-855-675-4480.

Projects proposals submitted by municipios informed program design during the development of the Action Plan and substantial amendment to the Action Plan. Municipios are eligible to apply to the City Revitalization Program, outlined in the Action Plan, which provides funding for a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Programs to address infrastructure are outlined in the Action Plan.

Comment: #038_10-02-18_Sandy V. Maloney (TSI Construction P.R. LLC)

"I am writing in an effort to find out where do I get the ID# RFQ/RFP in order for me to register my Company for the CDBG-DR-RFP-2018-01?"

PRDOH Response: Information regarding procurement, including Requests for Proposals (RFP), will be posted to www.cdbg-dr.pr.gov. PRDOH encourages interested parties to monitor the website for opportunities.

Comment: #039_10-02-18_Darwin J. Marrero

"Multi-Sector Initiatives should allow for each individual Academic Institution –University of Puerto Rico, Rio Piedras Campus and UPR Mayagüez– to submit applications for consideration by PRDOH. These proposals may or may not be drawn up jointly with the Municipios where the targeted downtown revitalization is to be located. Academic institutions have the legal, personnel and economic resources needed to reach the required additional investments. Even more so, they are able to come up with redevelopment proposals that will create the adequate environment for economic regeneration around their campuses while having the necessary technical knowledge about students, student housing and student community needs that will in turn, yield safe, economically vibrant areas."

PRDOH Response: Thank you for your comment. PRDOH values its partnership with UPR and will take these into consideration during further development of multi-sector initiatives.

Comment: #040_10-03-18_Héctor C. Velázquez Avilés

"My house is half wooden and half cement. The fragility of the wooden part in the event of another weather event is real. I want to know if you offer low-interest loans so I can finish my house."

PRDOH Response: Information regarding Housing Programs and other related CDBG-DR programs are available in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, when available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #041_10-03-18_Librada Ramos

"My name is Librada Ramos and I signed up for the moratorium after the terrible Hurricane María, for the months of October, November, and December 2017. I am disabled and I live with my 83-year old mother. It is impossible for me to pay all or part in a payment plan. I need assistance with mortgages in arrears. The bank is proposing refinancing, paying, loss mitigation. I am humbly awaiting the help that will be announced by the governor through AFV. We have been going through a lot of crises."

PRDOH Response: The Mortgage Catch-Up Program, as described in the Action Plan, outlines opportunities for mortgage payment assistance. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, as they become available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #042_10-03-18_Olga N. Ramos Vallellanes

"I still haven't finished fixing my home. It's made of wood. It leaks and it needs part of the roof. I live in Vega Baja. There was also a landslide near my house. I have a bathroom and a room; the carport is part of the house and I have not been able to fix it as a result of Hurricane Maria."

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for housing repair, reconstruction, and relocation. Information about the program can be found in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #043_10-03-18_Cecille Blondet-Passalacqua (Espacios Abiertos)

"Thank you very much for the information. We have two questions.

- 1) Are municipalities assigned by region/location and date? For example, residents of Guavate. Should they go to Metro, East, or Central?*
- 2) Where can the public request a turn beforehand? Or will that consideration be for public officials and mayors only, like it happened in March."*

PRDOH Response: Programs outlined in the Action Plan are designed to provide assistance to the entire island. At this time, there are no defined regions for CDBG-DR. Information regarding physical location of program intake centers will be published at www.cdbg-dr.pr.gov when it is available.

Comment: #044_10-03-18_Dario R. Martín (Piramid-All)

"To whom it may concern, I am writing to you to let you know that after so many earthquakes, hurricanes, and natural disasters that have taken place in several parts of the world, in addition to the new trend in the use of renewable energy, I saw an opportunity to give back to society. After several months of working and waiting, I have now finished developing, calculating, registering, and filing a patent for a House of the Future, which I named PIRAMID-ALL.-

Basically, it's a pyramid-shaped house that is highly resistant to earthquakes and hurricanes, efficient, smart, and self-supplied with renewable energy (Solar + Wind + Solar thermal).-It also

includes a charge station for electric vehicles, which will be hitting the market soon. This house is ideal for urban residential developments, zones that are off- or on-grid, mountain ranges, rural, semi-urban, islands, etc. Approximate execution time: 3 to 4 months

It is highly useful for distributed generation and new prosumers. -

My business proposal is to license the patent to several construction companies and/or developers with experience and support, distributed so as to cover the entire country.-

If you are interested in this project, do not hesitate to let me know.-”

PRDOH Response: Information regarding procurement, including Requests for Proposals (RFP), will be posted to www.cdbg-dr.pr.gov. PRDOH encourages interested parties to monitor the website for opportunities.

Comment: #045_10-03-18_Marie Angie Rivera (Rushmore Loan Management Company)

“I’m the SVP Mortgage servicing for Rushmore Loan Management Company and I have the following questions in regards Housing Programs, please review and advice;

- *Home Repair, Reconstruction, or Relocation Program*
 - *Clarify how/if property sellers can be added to the property listing provided to consumers who are eligible for relocation options (e.g. PRDOH-certified development roster)*
 - *Clarify if occupants who have been foreclosed upon – but still occupy the properties are eligible for the program (e.g. workout to purchase/retain home after sale)*
 - *Clarify how property values are intended to be determined if consumer is to be relocated*
 - *Can sellers –not primary residences but intend to sell - apply for funds to make improvements to existing properties?*
- *Rental Assistance Program*
 - *Can foreclose properties, but occupied (e.g. Tenant) be eligible for the program? (e.g. in eviction process)*
 - *Are sellers limited / or able to advertise the Homebuyer Assistance Program in homes?”*

PRDOH Response: Thank you for your comment. PRDOH will take this into consideration during further development of programs outlined in the Action Plan. The Home Repair, Reconstruction, or Relocation Program outlines opportunities for housing repair, reconstruction, and relocation. The Rental Assistance Program outlines opportunities for temporary rental assistance. Information, including eligibility criteria, about the programs can be found in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to [19](http://www.cdbg-</p></div><div data-bbox=)

dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #046_10-04-18_Olga N. Ramos

“I live in Vega Baja, and state of housing isn’t the best.”

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for housing repair, reconstruction, and relocation. Information about the programs can be found in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #047_10-04-18_Olga N. Ramos

“I am awaiting the various assistance and the requirements for requesting them.”

PRDOH Response: Information about the programs can be found in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #048_10-04-18_Glenda Viera (Municipio Canóvanas)

“Beginning on October 1, 2018, the person in charge of the Office of External Resources and Federal Programs of the municipality will be Dr. Glenda Viera. At the same time, the planner Mr. Manuel A.G. Hidalgo will be the Director of the Municipal Planning Office. The engineer Francheska Rivera will be in charge of administering the municipal projects.

The email for the Director of the Office of External Resources and Federal Programs will be: ... The Director of Planning’s email is ...”

PRDOH Response: Thank you for the notice. PRDOH values collaboration with municipios and looks forward to an ongoing positive working relationship with municipal stakeholders.

Comment: #049_10-04-18_Brenda Roldán

“For the next program (or assistance) following Tu Hogar Renace, do the inspectors have to take a course in OSHA? Thanks in advance for your response. I worked as an inspector and I would like to confirm if what I have been hearing is true.”



PRDOH Response: Inspections conducted as part of programs funded by CDBG-DR must comply with applicable federal and local laws and regulations. Laws and regulations governing the qualifications and certifications of program inspectors will be adhered to.

Comment: #050_10-04-18_ José A. Cruz

“HURRICANE MARIA DESTROYED MY HOME. I WAS ABLE TO PUT TOGETHER PART OF THE HOUSING. AT THE START OF JULY 2018, I REGISTERED WITH THE PR RESPONDE PROGRAM. DESPITE THE FACT THAT I FOLLOWED UP ON MY CASE, I WAS TOLD THAT I WAS LEFT OUT. AND THE EMPLOYEES WHO REALLY WANTED TO HELP ME INFORMED ME ABOUT THESE FUNDS AND THIS MEANS.

I WOULD LIKE TO FINISH MY HOUSE. IF YOU THINK YOU CAN HELP ME, LET ME KNOW.

JOSE FROM PATILLAS.”

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for housing repair, reconstruction, and relocation. Information about the program can be found in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #051_10-04-18_ Kathy Díaz Ortega

“Can you all tell me what has to be done about the houses that were lost [in the hurricane]? or is it that you haven’t started as yet? I have been keeping an eye out ever since [you] began construction. I sent an email, but I don’t see where I am told anything constructive.”

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for housing repair, reconstruction, and relocation. Information about the program can be found in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #052_10-04-18_ Ricardo Díaz Soto (Díaz Soto Law Office)

“We are interested in learning how to reserve or confirm a community presentation of our comments regarding the Action Plan (Amendment 1) of September 21, 2018, at the public hearings that would be held from October 15th to 19th, 2018. Whom do we have to contact by email or by phone.”

PRDOH Response: All parties interested in presenting during public hearings were given five minutes to present. Additionally, attendees of the public hearings were encouraged to provide comment via methods outlined in the Citizen Participation Plan.

Comment: #053_10-04-18_Mildred Santiago (Advisory Environmental Technologies, Inc.)

"I am the owner of a Small Business 8a, minority firm, women's business enterprise certified company. I read in the Environmental Consulting Services RFP that the companies participating in the bid as a prime should take the necessary affirmative steps to subcontract companies certified as mine is. Can I receive the list of companies registered to approach them? I looked in the website to see if I can find a list of interested vendors but I couldn't find it."

PRDOH Response: Information regarding procurement, including Requests for Proposals (RFP), will be posted to www.cdbg-dr.pr.gov. PRDOH encourages interested parties to monitor the website for opportunities.

Comment: #054_10-05-18_Amber Madden

"Just wanted to give heads up on an error on the Action Plan page in the following sentence.

"This action plan includes an analysis of the first damage calculation and reports on the preliminary design of the programs that will meet these needs with the first \$1.5 million designated by the United States Congress on February 9, 2018."

I believe it should state \$1.5 billion."

PRDOH Response: Thank you for your comment. PRDOH has reviewed this error in the mentioned sentence.

Comment: #055_10-05-18_Joe Santiago

"When [resina (sense unknown)] we are in great need after Hurricane Maria. For more information ... joe Santiago."

PRDOH Response: Thank you for your comment. PRDOH is committed to leading a transparent recovery effort. Information regarding CDBG-DR programs will be posted for public consumption at www.cdbg-dr.pr.gov.

Comment: #056_10-05-18_Myrta Pabón García

"I direct an NGO that has two housing projects that are ready to be occupied. We have an Independent Living Group Home. It has been really hard for us to find funds for administration. The HUD Office in Jacksonville, Florida recommended that we contact you to explore the possibility of receiving funds from CDBG. We appreciate information on how to become qualified/apply."

PRDOH Response: NGO's are eligible applicants for several programs outlined in the Action Plan, including the Social Interest Housing and City Revitalization program.

Comment: #057_10-05-18_Arnaldo Peñalvert (Fundación Jesús de Nazareth)

"Our president, Mrs. Mayte Maldonado, has put me in charge of the Foundation's Project. I need to know what stage the Action Plan presented to HUD on June 14, 2018, is in."

PRDOH Response: The Action Plan submitted to HUD on June 14, 2018 was approved by HUD on July 29, 2018. The approved version of the Action Plan and the version submitted to HUD on June 14, 2018 are both available at www.cdbg-dr.pr.gov.

Comment: #058_10-07-18_Karla M Andreu (Habitat for Humanity of Puerto Rico)

"I'm writing to learn whether there will be a qualification process for CBOs that want to apply to CDBG-DR.

I'd reviewed your page and cannot find the information. Other than attending the hearings, anything else we need to be doing at the moment to prepare? Do you have an admin checklist?"

PRDOH Response: Non-profits and Community Based Organizations are eligible applicants to several programs outlined in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, as they become available, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

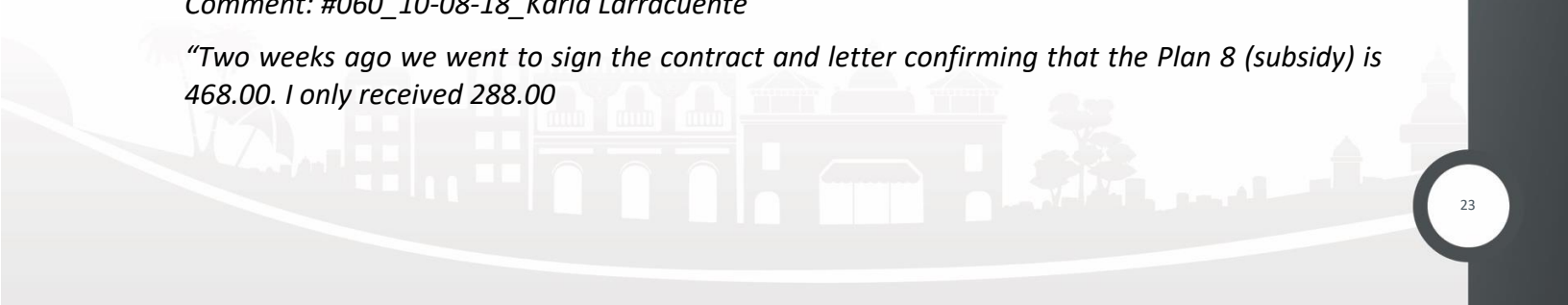
Comment: #059_10-07-18_Carlos Burgos

"My home's ceiling is falling since the hurricane and I'm worried because pieces fall on us even when we're sleeping. Some days ago, a piece of ceiling fell in the bathtub, and minutes before it happened, my grandson was there taking a shower. Thank God nothing happened to him, if not he would have been hurt really badly. I hope you can help with this very dangerous situation."

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for homes damaged by Hurricanes Irma and Maria. Information about the program can be found in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #060_10-08-18_Karla Larracuent

"Two weeks ago we went to sign the contract and letter confirming that the Plan 8 (subsidy) is 468.00. I only received 288.00



The house is located in Alturas de Bucarabones in Toa Alta. Can you tell me why the payment was not made in full?"

PRDOH Response: Section 8 vouchers are not a part of the CDBG-DR Action Plan. Therefore, PRDOH cannot respond to Section 8 voucher concerns.

Comment: #061_10-08-18_Xavier Figueroa Sánchez

"I, Xavier Figueroa Sánchez, and my wife, Maribel, and my two sons lost our house due to hurricane Maria and what FEMA gave me is not enough to repair it. I need help to have our home back. You can reach me at this number..."

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for homes damaged by Hurricanes Irma and Maria. Information about the program can be found in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #062_10-08-18_Jose A Miranda Miranda

"My comment is directed to the activities within PAN related to prevention and actions to take before a catastrophic event. In our particular case, assisting the elderly and people with disabilities who live in nursing homes or federally-subsidized housing projects. I speak about my case, as administrator to 2 projects for the people just mentioned. Our comment is intended to request that the possibility of providing funds to these federally-funded housing projects that are private and help hundreds of low-income people be considered. The funds to be awarded would greatly help these projects, that usually have a very limited budget and it's almost impossible for them to add facilities or services that benefit their residents. For example, housing projects usually have an emergency generator that only covers some common areas. It would be ideal to have an emergency generator to power all the units, so it's easy for its residents to prepare their own meals, ensure their safety, among other benefits. The problem is that a new generator to cover this service can cost more than \$350,000, which projects don't have, and HUD can't assign. Other possible improvements to these projects are the installation of security windows and doors, installing new diesel tanks with higher capacity for the generators, among other possible improvement projects.

To such effects, we request you consider the possible award of funds for multi-family federally-funded projects, which are the ones that provide housing to individuals who are most vulnerable and have the most needs in Puerto Rico. That's why we suggest the mayor of each municipality includes the needs of these projects in their needs plan."

PRDOH Response: Thank you for your comment. The Multi-family Reconstruction, Repair & Resilience program is designed to provide assistance for long-term recovery and restoration of multi-family residential buildings. The Community Energy and Water Resilience

Installations program aims to provide sustainable, resilient energy to residents of Puerto Rico. PRDOH will take your comments into consideration during further development of these programs.

Comment: #063_10-09-18_Jorge Luis Vazquez

“When will the program start?”

PRDOH Response: Currently available information about the CDBG-DR Programs can be found in the Action Plan. Further definition regarding start dates will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD.

Comment: #064_10-09-18_Margarita Berríos

“I went into the webpage and I don’t see any information regarding when and where I will be able to register for the CDBG-DR program.

I’ll keep looking in the media outlets and on your page. If you have any updated information, please let me know.”

PRDOH Response: Currently available information about the CDBG-DR Programs can be found in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines, policies, and start dates will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #065_10-09-18_David Iverson

“My name is David Iversen. I am a freelance reporter based in New York City. I was in Puerto Rico in early September writing about the town of Loiza in the Hurricane Maria recovery. In re-reading your Sept. 21 report, I had a question about the following quote on page 63: “Denial rates for FEMA Housing Assistance (81%) and percent of those applying for but not receiving SBA (61%) have been uniquely high for Puerto Rico.”

I believe your research to be accurate, but FEMA is providing a dataset that is showing a lower denial rate. Could you please provide the data by which you based that statement?”

PRDOH Response: Thank you for your comment. All data sources used during development of the updated unmet needs assessment are referenced in the appendices of the Action Plan.

Comment: #066_10-09-18_Juanita Ortiz

“I would like to know what assistance is available for people who received assistance from FEMA, but it wasn’t enough to repair their homes.”

PRDOH Response: Currently available information about the Housing Repair, Reconstruction, and Relocation Program can be found in the Action Plan. Further definition regarding the process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines, policies, and start dates will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #067_10-10-18_Alana Feldman Soler

"I'm a resident from the Novillo del Barrio Yahuecas Sector in Adjuntas. Five families live in the sector, but since I work throughout 32 municipalities from the Center and Western area of the Island, I can tell you that our situation is similar to that of many other families in the neighborhood and the municipality.

Since hurricane Maria, power has been unstable: cables fall; transformers explode, the power goes out. As you well know, this is especially true every time it rains and threatens the food safety and health of the elderly, children and people with chronic conditions. We recommend micro grid projects be developed to connect the most isolated communities in the rural areas to renewable energy systems.

The rural area roads haven't been stabilized either since the 2017 hurricanes. Landslides took part of the roads, as well as the trees and mountain sides that provided support. As it continues to rain, the runoff and erosion continue washing away parts of our roads. The rain runs through the center of the road in areas where culverts still have landslides and debris, and open new roads on the side of the roads. Especially in mountain areas, of winding roads and steep slopes, it's dangerous to drive at night or in the rain in municipality rural roads of municipalities, such as Yauco, Ponce, Adjuntas, Utuado, and Lares. It's critical that part of the recovery funds be used to develop mitigation projects to divert rainwater, build retention walls, plant native deep-rooted trees, open roads wider and repair the potholes caused by the water.

It's not news to anyone that there are still people living under blue tarps; people living in overcrowded conditions with family members; people occupying spaces in community centers and abandoned schools; and people who have still not managed to repair their homes. Many of these people didn't qualify for FEMA funds. It's necessary that the CDBG DR funds consider the housing situation in the rural areas, where there are abandoned structures along our roads and where rental properties are scarce. The efforts to provide legal ownership to people who live in family successions should be supported. Community mutual aid processes should also be supported. Support programs should also be developed for repairing rental properties at reasonable costs; and also donations and technical assistance should be offered for repairs to people who haven't accessed other funds or resources to repair their home.

A great part of the community rural aqueducts in the mountain area work almost by chance. They're in need of repair, pipe replacement, chlorination pumps... but more than anything, the bureaucratic procedures governing them need to be simplified; together with the compliance, management and structuring procedures. The NONPRASA system will not resist another natural, humanitarian or political disaster. Simply put, they don't have the scale economics to finance the

high costs of bacteriological tests, meters and renewable energy. They don't have a young and growing population either. They need a public policy and a program that assumes the role of making these systems functional and responsive.

Regarding the economic development, it's imperative to encourage and motivate: 1) food sustainability through agricultural production incentives of family and community farms; 2) and the development of vocational development opportunities in rural towns, where there are very few, if any saddlers/upholsterers, carpenters, shoemakers, cabinetmakers, renewable energy experts, veterinary assistants, healthcare personnel, etc.; and 3) the community small businesses that supply the local need of the area neighbors.

These are skills that should be particularly encouraged among young people and women. First to minimize the migration and second because they are a majority and their potential dependency increases the vulnerability to domestic violence.

The CDBG DR funds shall not be invested exclusively in the towns' urban areas. Neither should they be for tourism projects. Our main goal should be to ensure the quality of life of our communities, whether small, unknown, or isolated. Those are the ones that will attract financial and tourism development to the region. Without them, there's no attraction, no human capital, or local culture to help the economy from visitors".

PRDOH Response: Thank you for your comment. PRDOH is committed to leading a multi-faceted recovery effort that incorporates mitigation and resilience measures to the greatest extent possible. Infrastructure programs outlined in the Action Plan, including FEMA Coordination and Critical Infrastructure Resilience programs aim to provide assistance in developing resilient infrastructure.

Housing programs outlined in the Action Plan are not restricted geographically. The entire island of Puerto Rico is an eligible area for all housing programs. The Rental Assistance program provides rent subsidies for low income families and the CDBG-DR Gap to Low Income Housing Tax Credit program, Multifamily Repair, Reconstruction, and Resilience program, and Social Interest Housing program are designed to provide affordable rental housing options. The goal of the Title Clearance Program is to provide clear title to homeowners throughout the hurricane-impacted area. A FEMA ineligible determination does not preclude applicants from participating in any of the housing programs outlined in the Action Plan. Applicants who were deemed ineligible to receive FEMA assistance may still qualify for programs outlined in the Action Plan.

Economic Development programs outlined in the Action Plan include Re-Grow Puerto Rico, which focuses on promotion of urban and rural agriculture; the Workforce Training Program, which seeks to aid in the vocational development of unemployed or underemployed persons; and the Small Business Financing program, which provides loans or grants to aid in the recovery of small businesses. Economic Development programs are not geographically restricted. The entire island of Puerto Rico is an eligible area for all economic development programs, including rural areas.

PRDOH appreciates your thoughtful comments and will take them into consideration during further development of programs.

Comment: #068_10-10-18_Marie Angie Rivera

“Following up on this request. Please provide response on inquire below.”

PRDOH Response: Thank you for your comments. PRDOH has responded to your previous comment and will take them into consideration during further development of programs.

Comment: #069_10-11-18_Namir Torres Aquino

“We’re victims of hurricane María. We currently live on a cement house with 25% of the roof covered with zinc and the other 75% of the roof covered in blue tarp. The first tarp installed by FEMA, was destroyed with the bad weather. And Ayuda al Ciudadano from the Bayamón municipality, gave us 2 additional tarps. My question is, if you can help us, to be able to build a cement roof and how we can request your assistance.”

PRDOH Response: Currently available information about the Housing Repair, Reconstruction, and Relocation Program can be found in the Action Plan. Further definition regarding the process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines, policies, and start dates will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #070_10-11-18_Jennifer Colon Soto

“Who qualifies for those vouchers? What qualities or what requirements would the person have to have to be able to qualify?”

PRDOH Response: Currently available information about the CDBG-DR programs can be found in the Action Plan including eligibility criteria. Further definition regarding the process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines, policies, and start dates will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #071_10-11-18_Arnaldo Peñalvert Vázquez (Fundación Jesús de Nazareth)

“We would like to know in what’s the STAGE of the Action Plan we presented for HUD.

According to an e-mail that Mrs. Mayte Maldonado received on July 3, 2018, it indicates that the documents can be seen in the web page: <http://www.cdbgdr.pr.gov>.

I visited the page but I don’t know where I can see the documents, we need to know how to see them in order to be up to date and take the appropriate actions.”

PRDOH Response: PRDOH’s Action Plan was originally published for public comment on May 10, 2018 and submitted to HUD on June 14, 2018. The initial Action Plan was approved by HUD on July 29, 2018. The substantial amendment to the Action Plan was published for public comment on September 21, 2018 and submitted to HUD on November 18, 2018. All versions of the Action Plan and its substantial amendment are available online at www.cdbg-dr.pr.gov.

Comment: #072_10-12-18_Christian J. García Arroyo

“I’m a police officer for the San Juan municipality and I’m interested in the assistance available for police officers for buying a house. I would like to know the process and where I should go to apply for assistance.”

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home. Information about the program can be found in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #073_10-12-18_Eduardo Gutiérrez Casillas

“I’m writing regarding the federal housing assistance. What number can I contact or what would I have to do to get that assistance. I would like to find out more information and you could contact me at ... or ...”

PRDOH Response: Currently available information about the Housing Programs can be found in the Action Plan. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #074_10-12-18_Luz I Avilés Hernández

“I’m interested in knowing the details, information, documents of the Mortgage Incentive Initiative for police officers, firefighters, etc...”

If you would be so kind and send me the information since my husband is a PR firefighter and we are very interested.”

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home. Information about the program can be found in the Action Plan. Further definition regarding application periods, documentation and process used to

determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #075_10-12-18_Maribel Ramos

"I live in... Toa Baja.

My Pastor: Prudencio Andújar, from Valle Verde Church in the same sector, sent me this bulletin and that's why I want to ask for guidance and assistance.

First of all, I know there are many people who have not received help, including in my neighborhood, but I can only talk about my specific case.

During hurricane Irma, a large branch of an almond tree fell right in the center of my wood house, and weakened the structure, but thank God it stayed standing. My children and family removed the branch and cleaned up, so the municipality didn't have another burden.

Then came hurricane Maria, and the story was different. My house has panels on the roof covered with zinc and the winds vanished the zinc and tore down a panel, but also weakened the structure to the point of almost ripping off the material that holds the panels and the zinc.

But by a miracle of God, it didn't blow it off like so many other homes from my neighbors and in the island.

Because the roof panels were not adequately installed the home got wet and I lost almost everything inside, including kitchen cabinets, doors, it damaged decorative panels with the exception of personal items I had saved in plastic boxes.

My children picked up the zinc panels they found and tried to cover it, but since they don't know how to install them, the inside was still getting wet.

My sister-in-law installed 2 tarps, until the FEMA engineers, once again like a miracle, appeared one day and installed their tarps... and that's how I still am today.

My children and I tried to clean, paint a little and bought a cabinet and some doors with what FEMA gave me, to be able to live, and the mold didn't continue causing damage.

FEMA came, inspected, but only gave me \$1,554 for "personal things". With the abuse from the hardware stores and the disregard when increasing the prices of the building materials, it's impossible for me to install the roof of my home and finish fixing it and reinforcing the structure.

Why didn't FEMA help me?

Because where I live is an inheritance between my sisters and me, they are over 70 years old and they have never submitted any of the deeds.

I don't have any documents for the house or property, I just know that the records and plans appear in the Housing Department under my mother's name, Catalina Oquendo Álvarez, and my name, Maribel Ramos Oquendo.

Because at the time of surrendering the rights of the invasion I was with my mother, and the engineer, Pablo, put it in both our names.

Please, don't ignore this email...

I need guidance and help, because I'm afraid of another hurricane and losing everything that was left.

And now I have my daughter and grandchildren living with me, for her health and mine, because I'm not doing well."

PRDOH Response: Information about the Title Clearance program, the Home Repair, Reconstruction, and Relocation Program, the Community Energy and Water Resilience Installations program, and all other housing programs can be found in the Action Plan. A FEMA ineligible determination does not preclude applicants from participating in any of the housing programs outlined in the Action Plan. Applicants who were deemed ineligible to receive FEMA assistance may still qualify for programs outlined in the Action Plan.

Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #076_10-13-18_Kaya Laterman

"My name is Kaya Laterman and I am a freelance reporter from the Sunday Metropolitan section of the New York Times. I am currently working on two stories for the paper for the 6th anniversary of Hurricane Sandy. In one of my sidebar pieces, I am attempting to explain the current national disaster recovery system and will be mentioning how long New York's Governor's Office of Storm Recovery took to get their action plan approved by HUD. (FYI: 6 months).

I would like to know two things:

--It took 10 months for the action plan for Hurricane Maria to be approved by HUD

(I have 7/29/2018 as the date HUD approved and I'm calculating Maria hitting on 9/20/2017)

--In addition, my editor wants to know if the Maria action plan was written from scratch, or did Puerto Rico have a disaster recovery action plan already in place (which it built on after Maria)?

If you could get back to me by Monday 10/15, I'd greatly appreciate it.

The story will be in the Sunday Metro section on 10/28, likely online a few days earlier."

PRDOH Response: The Action Plan was submitted to HUD on June 14, 2018 and was approved by HUD on July 29, 2018. The Action Plan was developed in accordance with guidance set forth in 83 FR 5844, which was published on February 9, 2018.

The substantial amendment was developed by additional guidance outlined in 83 FR 40314, published on August 14, 2018. The substantial amendment to the Action Plan was submitted to HUD on November 16, 2018.

Comment: #077_10-13-18_María Rodriguez

“I’m writing again to know if the program already started and if you know what the necessary requirements and documents are.”

PRDOH Response: Currently available information about the CDBG-DR programs can be found in the Action Plan.

Comment: #078_10-13-18_Kelvyn X. Martínez Medina

“I’m writing because I’m interested in a job with the Department of Housing for this new project that’s about to begin. I have work experience with Housing inspections, since I’m currently working with Tu Hogar Renace (STEP) Program on the Housing Department side. I received guidance from a current employee from the Puerto Rico Department of Housing and he gave me this site as reference to search for a job. I also have a Bachelor’s Degree in Business Administration with a concentration in Management. I would appreciate any kind of answer. My contact number is... and my email...”

PRDOH Response: Parties interested in employment opportunities available with PRDOH should contact the PRDOH Human Resources Department

Comment: #079_10-21-18_Flex Made

Flex made submitted a brochure detailing options for construction using Flex Made panels. The document outlines some specifications of the product and includes timelines for construction of structures.

PRDOH Response: Parties interested in doing business with PRDOH should monitor www.cdbg-dr.pr.gov for procurement opportunities as they become available.

Comment: #080_10-14-18_Cármén Hernández Serrano

“GENERAL COMMENTS

- *The time dedicated to presenting comments is limited due to the magnitude of the document and the amount of specialized information.*
- *It would have been recommended to set up a meeting with community-based, faith-based, civil rights advocacy, and women’s organizations, and cooperatives, to provide workshops about the document content in order to disseminate the message to the communities.*



- *Using different outlets to disseminate the document in order to make it more accessible to individuals (i.e. flyers, posters with specific information about the programs, question and answer lists, etc.).*
- *The fund award method (by reimbursement) limits the non-profit organizations that don't have the financial ability, to request funding directly to develop projects. In many cases, bad management and corruption in fund management by the state and municipal government, there could be certain apathy to submitting proposals for project development."*

PRDOH Response: Thank you for the comment. As required by 83 FR 40314 and in accordance with commitments made by PRDOH, the substantial amendment to the Action was Plan 30 days. PRDOH worked with numerous community groups, agencies, non-profit organizations and other stakeholders to distribute information regarding the substantial amendment to the Action Plan and its public comment period. Information regarding programs for which non-governmental organizations are able to apply is contained in the Action Plan. Further information regarding how NGOs can apply for assistance will be posted to www.cdbg-dr.pr.gov, after programs begin.

"COMMENTS AND SUGGESTIONS BY CATEGORY

Planning

- *Train the communities to identify the needs and prepare an action plan to provide an immediate response to events like hurricanes. For example, elderly, people with disabilities, children, and pets. Besides having a resource bank to collaborate in the pre-disaster stage and in the recovery post-disaster. The communities are not the best indicated to provide responses because they know the members of the community. The same goes for training in first aid, conflict mediation, nutrition, etc.*
- *Provide information to the communities located in risk areas on how to prevent disasters.*
- *Possible organizations that could channel the funds include: UPR (Social Work Program, Community Psychology Program, Home Economics Program, Veterinary School)*
- *At the municipal level, projects directed to preparing tree management and forestation plans should be established, that include participation by the community and related organizations. It's important that those plans consider, among others, the identification of trees requiring trimming, removal of trees in inappropriate places that are sick, etc. Additionally, projects should be promoted in the community for planting native species trees since they are most resistant to high-wind events and hurricanes. The correct planting of trees contributes to the mitigation of the erosion and flooding effects.*
- *Possible organizations that could channel the funds include: Department of Natural and Environmental Resources, Municipalities, RUM, organizations expert in the subject.*
- *The Municipal Spatial Planning as well as the regional and national land use plans should include the physical and socioeconomic information generated prior to Hurricanes Irma and María.*

- *Incorporate more stringent requirements when granting permits for the different construction projects (urbanizations, individual projects, antennae and billboard location) in such a way that they don't constitute a hazard or threat.*
- *Promoting projects to develop community plans, especially in communities located in areas with risk of flooding, tsunami, landslides, etc.*
- *Possible organization that could channel the funds include: Planning Board, Department of Natural and Environmental Resources, Municipalities, Planning School, non-profit organizations expert in the subject, UPR."*

PRDOH Response: The Whole Community Resilience Planning program offers an opportunity for communities to create comprehensive long-term plans for thoughtful and resilient community-wide recovery. Support for municipal planning is also offered under this program.

"ECONOMIC DEVELOPMENT

- *Promoting projects for the construction and operation of nurseries to propagate the species needed for forestation. The rescue of abandoned or deteriorated areas to establish the projects. In addition, in adult and youth correctional facilities, and in mental facilities. Besides complying with the objective of propagating trees, it constitutes therapy for the participants.*
- *The rescue of abandoned or deteriorated areas can be encouraged to establish the projects. Also, in adult and youth correctional facilities and in mental institutions. Besides complying with the objective of propagating trees, it constitutes therapy for the participants. It can also be encouraged among the homeless population.*
- *Provide incentives to company owners that left the Island because their businesses were impacted by the hurricanes (farmers, poultry farmers, livestock farmers, etc.). It also includes people who lost their jobs.*
- *Develop housekeeper programs focused like one from the Veterans Administration, where family members can provide services to the elderly person or the person with disabilities. The objective would be to promote jobs for women. These should be permanent jobs with benefits, such as health insurance, vacations, etc.*
- *Incentives for projects by women who are heads of households that were impacted by the hurricane.*
- *Childcare centers so that women can work and study.*
- *Restore closed schools and rehabilitate them so they provide services to the community and, in case a hurricane happened, can be used as shelters. Take into account elderly people with disabilities and pets.*

Possible organizations in charge include: Department of Natural and Environmental Resources, RUM (Agronomist Program and organizations from the same community and NGOs with experience in the areas, churches, women's organizations, etc.)"

PRDOH Response: A wide breadth of economic development programs, such as Re-Grow Puerto Rico, Small Business Financing and the Workforce Development program are included in the Action Plan. The Re-Grow PR Urban-Rural Agriculture program outlined in the Action Plan may provide assistance to urban or rural, large- or small-scale agriculture, livestock or aquaculture installations; Small Business Financing offers grants or loans to eligible small business; and the Workforce Training Program grows the skills of the workforce to aid un- and underemployed persons. PRDOH will take these comments into consideration during further development of economic development programs.

“RECOVERY

- *Rehabilitate places in each community that can serve as temporary shelters for people that have to be evacuated. It could be schools that have been closed or community centers. They should be equipped with solar panels so they can provide the basic services when there’s no power. These centers could become communal feeding centers so the community itself performs this task.*
- *Rehabilitate an mobile clinic to provide services to isolated communities*
- *Incentives to rehabilitate structures in historic zones.*
- *Incentives for second-home owners for temporary rental to people who have lost their homes or who need shelter while their house is repaired. There should be an inventory of places for rent or rooms in homes that have the facilities to shelter people temporarily. They should be exempt from paying taxes while they cover that need.”*

PRDOH Response: The Community Resilience Centers program outlined in the Action Plan creates a known network of clearly identified and registered community resilience centers across the island to support communities during disasters. PRDOH will take these comments into consideration during further development of infrastructure projects or as additional programs are designed if additional funding becomes available.

“Citizen Participation Plan

- *The mechanisms used to disseminate the Plan are limited. Due to the magnitude of the document it’s recommended documents that summarize the most important aspects of the document be prepared. Also, educating about the importance of the document and how it personally affects me and my community.*
- *Faith-based institutions are organizations where you can coordinate they provide their message to their membership about both documents and the importance of participating.*

FINAL COMMENT: The results of the evaluation done to Tu Hogar Renace Program should be published. It is a known fact that people who were supposed to benefit from this program had bad experiences. This is why any help Puerto Rico receives should avoid using this system to channel funds. The recommendation is to train people who have lost their jobs to perform the restoration work.”

PRDOH Response: Thank you for your comments.

Comment: #081_10-14-18_José Del Toro

"I was reading your information regarding the HUD Program for the recovery of Puerto Rico, after Hurricane María. According to the information I understand it's related to the reconstruction of existing properties and new constructions. In the personal aspect, I'm interested in having information about new constructions.

I have been back living in Puerto Rico for 8 years, after growing up and lived in the states for more than 56 years. I was born in Mayagüez, I'm retired, I have rented a house for the past 7 years and 6 months in Carolina and I'm interested in having my own house. I would appreciate any guidance on the matter."

PRDOH Response: The Homebuyer Assistance program, outlined in the Action Plan, provides assistance with down payments and/or closing costs associated with the purchase of home. Program guidelines, policies, and start dates will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #082_10-14-18_Juan Luis Nieves

"Don't forget the Judiciary Branch Bailiffs."

PRDOH Response: Thank you for your comment. The Homebuyer Assistance program, outlined in the Action Plan, targets critical recovery workforce sectors, including law enforcement, and provides assistance with down payments and/or closing costs associated with the purchase of home.

Comment: #083_10-14-18_Kathy Díaz Ortega

"Can you tell me what to do for the construction of homes, of houses, if I have to go somewhere? I lost the top part of my house, which are the bedrooms. I'm living in a house that was abandoned in my neighborhood. I fixed it a little to be able to live in it. I see many things about construction, but I don't understand any of that, I need some of that help please."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #084_10-14-18_Nelson Rodríguez Nieves

"I want information about the incentive for homes that the Governor announced for public officers of emergency response, since I'm a police officer. I appreciate all the information you can provide me."

PRDOH Response: Thank you for your comment. The Homebuyer Assistance program, outlined in the Action Plan, targets critical recovery workforce sectors, including law enforcement, and provides assistance with down payments and/or closing costs associated with the purchase of home.

Comment: #085_10-15-18_Oficina de la Procuradora de las Mujeres (OPM)

Summary: On 10/15/18, OPM submitted a letter of commentary and recommendations toward the Action Plan in order to better attend to the needs of women with the vision of providing social support services to women.

Housing:

For the social interest housing program, they cite the potential for expanding services to include the help from OPM to provide training to shelter staff for better overall responsiveness to the needs of women who may be victims of domestic violence and overall mental health wellbeing. They propose 14 different measure of which some are highlighted below.

They request to expand the opportunities of housing to young adults who are of legal age and at an age of emancipation and university age to be included in the programs.

Prioritize women who are survivors of violence in the vouchers for housing and contributive credits program to get accessibility to housing.

Provide focused attention to university youth who are classified as chronic homeless under HUD's definition.

PRDOH Response: Thank you for the comments. PRDOH will take these into consideration during further development of housing programs. The Social Interest Housing program provides housing for vulnerable populations, which may include victims of domestic violence and the Housing Counseling program provides educational and support services to residents. PRDOH looks forward to an ongoing collaborative relationship with the Oficina de Procuradora de las Mujeres and other stakeholders in development and throughout the life of these programs.

Infrastructure:

They cite the need to support the subsidy of utilities especially water and electric services to women in process of acquiring or reacquiring housing.

Economic support to women who are survivors of violence living in hostels to improve their infrastructure, emergency support and other improvements that will allow their living spaces to pass state and federal inspections.

OPM also suggests a project that will address domestic equipment that can be used during an emergency such as gas stoves, hybrid or solar powered equipment, electric plants, water tanks, water purifiers for women in need.

They suggest assigning funds to FEMA projects since those projects and organizations involved do not provide these types of support services to women, kids and teenagers in need.

Allocate funds to hire resources that provide support, follow-up and technical assistance to the shelters in the drafting and implementation of emergency plans aligned to the strengthening and energy resilience plans and social response.

Revitalization projects to take into account the need for transportation accessibility for women who are elderly and those who don't have access to mass transit.

PRDOH Response: The Community Energy and Water Installations program provides renewable, sustainable energy options, like solar, to residential and small business structures on the island. The goal of the Social Interest Housing program is to provide resilient, dignified housing to vulnerable populations, including survivors of domestic violence. PRDOH will leverage other funding streams, including FEMA, whenever possible. These comments will inform PRDOH during further development of infrastructure programs outlined in the Action Plan or during development of additional programs if more funding becomes available.

Economic Recovery:

They also propose training for first responders to be able to identify and handle those who may be suffering from domestic violence.

All housing projects should be accompanied by support services to strengthen mental health and skill of employability to achieve that women who are survivors of violence and their children are self-sufficient.

Provide social services to youth who may have been deprived of one or both parents due to domestic violence in the home.

PRDOH Response: Thank you for the thoughtful and thorough comment. PRDOH acknowledges the complex nature of serving survivors and those impacted by domestic violence and looks forward to a collaborative relationship with Oficina de la Procuradora de las Mujeres and other organizations to ensure programs outlined in the Action Plan are sensitive to serving this population.

Comment: #086_10-15-2018_Hon. Félix Juan Maldonado Rodríguez (Delegación de Mayoría de la Legislatura Municipal de Ponce)

Summary: On 10/15/2018, Delegación de Mayoría de la Legislatura Municipal de Ponce submitted a whitepaper stating the impact of hurricanes Irma and Maria on the municipality and the citizens of Ponce. The whitepaper highlights FEMA data of 50,193 affected citizens with only 20,898 cases being eligible, leaving a great amount of unmet needs. The whitepaper concludes that the Municipality of Ponce has administered more than \$200,000,000.00 of federal funds and has over 30 years of experience, demonstrating the capacity to be a viable partner to take part in the CDBG-DR funds.

PRDOH Response: PRDOH values the participation of all municipios, non-profits, non-governmental agencies, and community-based groups and looks forward to a working

relationship at various levels throughout the life of the grant. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #087_10-15-18_Municipio de Dorado

Summary: On 10/15/2018, The Municipio of Dorado submitted a proposal which outlines use of recovery funds for infrastructure, housing, and economic recovery projects. The proposal suggests the following program activities:

Infrastructure:

The Municipality supports using CDBG DR funds for a backbone network project, that is being carried out by the water authority (AAA) called Nueva Troncal Sanitaria from the state capital budget plan 2-26-5002. They cite the importance of this project to avoid overflow problems, facilitating additional development systems, ensuring the commercial and residential future of the municipality for 7,900 residents and providing positive impacts to other areas such as Northern Vega Alta.

Drainage projects are also proposed:

Drainage system with 5 sinks in Lagunas, Doraville, San Antonio in the barrios of Espinosa and Higuillar de Dorado which has \$7,364,000.00 in FEMA funds assigned to mitigate the effect of flooding with measures such as the construction of retention ponds or wells to couple the flow of rainwater they receive.

Chorro de Kuilan project in the Kuilan community would address flooding but out of the 5 phases of the project, only the first was completed. They would need \$3million to complete.

The Rainwater systems projects in the urbanization of Los Montes would address pond retention capacity, addressing wells underground and the replacement of the PVC pipe of the overflow of the pond with a box culvert made of concrete. They would need \$463,000.00 to complete this project.

Phase 4 of the Paseo Mendez Vigo project from the Highway and Transportation Authority which would address the need for storm resiliency by undergrounding of primary and secondary electric lines, the system of public lighting and undergrounding telephone lines and cable TV on Mendez Vigo street from PR 696 to PR 698. This project would need an additional \$2,774,178.42 in funding.

Dorado proposes the use of \$2,989,000.00 to address the need to construct a sanitary sewer system since the existing septic well do not conform to the code of the department of health and there are direct effects to the water and ground of the residents of Comunidad San Carlos del Bo Higuillar in Dorado. In Comunidad Doraville this same type of needed intervention would require an investment of \$3,478,000.00 in CDBG-DR funding. In Comunidad Santa Rosa del Bo. Maguayo an approved existing Project from the AAA would currently require funding of an estimated \$4,000,000.00

Other cited projects include construction of the PR 2 pedestrian bridge between Mavito and Jacana Improvements in pluvial system and runoff water, underground electrical lines in Carr. PR

697, ramps for boats in Villa Pesquera, underground improvements for PR 695, public plaza improvements etc.

Housing:

Dorado cites their ability to help identify families for the laudable incentive voucher program from the October 12 article in *El Nuevo Dia*. They also cite the need to repopulate the urban center through the recovery of abandoned and unused properties that have turned into public nuisance for the use of new housing.

Economic Recovery:

Dorado cites an unfinished March 2016 project that was intended for economic development; the Hotel Municipal in Costa de Oro that was meant to have 53 rooms, create employment, a grow local business such as restaurants and assist the growth of local tourism. The project has \$5.5Million in Section 108 funds and a municipal loan for \$3.8 million which was not ultimately provide since the Banco Governmental lacked liquidity which caused the project to stop at 63.33% of construction. They would need \$3.4 Million to complete construction and set up facilities to get businesses started. This project also supports the goals of the PR Tourism Company to increase the number of available rooms for tourism.

They also cite Carretera 696 as an industrial area that would need the investment of CDBG DR funding to assist the growth of small businesses needed in that area such as food trucks. This project has existing design plans and permits acquired. They estimate a \$1,400,000.00 for this project.

PRDOH Response: Municipal projects, like those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

PRDOH values a positive working relationship with municipios and looks forward to working with them to serve the people of Puerto Rico throughout the life of the recovery process.

Comment: #088_10-15-18_Dolmary Colón Martínez (Director, Office of Federal Programs and Section 8, Municipality of Salinas)

Summary: On 10/15/2018, the municipality of Salinas submitted a proposal which summarized the impact of Hurricane Maria and suggested activities to be funded under CDBG-DR. Salinas suggests the following activities be funded under CDBG-DR funds.

Housing funds requested: \$34,800,000

- *Relocate families out of high-risk areas.*
- *Incentives for the purchase of new homes.*
- *Construct new housing units.*
- *Develop housing for elderly citizens.*

Infrastructure funds requested: \$3,500,000

- *Rehabilitate existing building to create emergency shelter and emergency operations center.*

PRDOH Response: These suggestions informed PRDOH during the development of programs outlined in the Action Plan. The Home Rehabilitation, Reconstruction, or Relocation program prioritizes elderly applicants and provides opportunities for eligible applicants to rehabilitate or reconstruct homes in place or relocate out of high-risk areas. The Social Interest Housing Assistance program aims to provide housing for vulnerable populations, which may include the elderly. The Homebuyer Assistance program offers assistance with down payments and/or closing costs associated with the purchase of home. The Community Resilience Center program provides funding for community resilience centers across the island to support communities during disasters.

Comment: #089_10-15-2018_Residentes de la 3ra, 4ta y 5ta Sección de Levittown

Summary: On 10/15/2018, the residents of 3ra, 4ta y 5ta Sección de Levittown submitted a white paper describing the effects of hurricane María on their community. The residents of 3ra, 4ta y 5ta Sección de Levittown request that these points be addressed to be ready for a future disaster of María's magnitude:

- *Cleaning of the Boulevard Monroig canal and surrounding areas*
- *Better lighting for areas in need*
- *Creation and organization of emergency centers*
- *Clearing of debris and waste management*
- *Improvements to the sewage and drainage systems"*

PRDOH Response: These suggestions have informed PRDOH during the development of the City Revitalization Program, Community Resilience Centers, and the Infrastructure Programs. Currently available information about these programs are outlined in the Action Plan. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #090_10-15-18_Daniel Martínez

"I would like information about buying a home, I'm a police officer."

PRDOH Response: Thank you for your comment. The Homebuyer Assistance program, outlined in the Action Plan, targets critical recovery workforce sectors, including law enforcement, and provides assistance with down payments and/or closing costs associated with the purchase of home.

Comment: #091_10-15-18_Municipio de Ponce

Summary: On 10/15/18, the Municipality of Ponce submitted a proposal which presented information on unmet needs, demographics, geographic and socio-economic conditions, and amendments to originally submitted projects. A detailed description of project plans by category, project budgets, project locations, project approved permits, municipal maps, and summary of impacted and vulnerable communities associated with each activity is outlined in the proposal. Ponce requests CDBG-DR funding for the completion of the following projects:

Housing Funding Requested: \$433,550,000.00

- *Rehabilitation, reconstruction, and relocation of households.*
- *Property title clearance program for the rural, coastal, and urban families.*
- *Mortgage assistance.*
- *Housing for vulnerable populations.*
- *Improvements to drainage and aqueduct systems for the rural and northern area of the municipality.*
- *Construction of new housing units made from resilient materials*

Infrastructure Funding Requested: \$203,500,000.00

- *Construction of an emergency operations center.*
- *Improvements and repairment of municipal pluvial systems.*
- *Improvements to the municipal drainage systems.*
- *Construction of a waste management plant.*
- *Installation of solar powered highway and street lighting system.*
- *Improvements and repairs to highways and streets.*
- *Construction of community resilience centers.*
- *Economic Recovery Funding Requested: \$26,375,000.00*
- *Business cash grants for small, local, emerging and international businesses.*
- *Cultural and local tourism program to transform affected neighborhoods.*
- *Construction of a social and business innovation center.*
- *Construction of a tourism center.*
- *Construction of a creative arts center.*
- *Creation of a home aid fund for senior citizens.*
- *Construction of agricultural markets.*
- *Development of a digital platform to encompass the municipality's local attractions, restaurants, historical landmarks, and night life venues.*

- *Municipal branding and international identity initiative.*

Planning Funding Requested: \$1,560,000.00

- *Phase I of Resilience Planning for the urban, rural, and coastal areas.*
- *Phase II of Resilience Planning for the urban, rural, and coastal areas.*

Multi-Sector Funding Requested: \$172,000,000.00

- *Revitalization programs for Plaza del Mercado, La Guancha, Parque Monagas, and other historic and touristic attractions.*
- *Construction of a regional animal shelter.*
- *Development of coastal parks.*

PRDOH Response: Projects suggested informed PRDOH during development of the Planning Programs, Housing Programs, Economic Recovery Programs, Infrastructure Programs, and Multi-Sector Programs. Municipal projects, like some of those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors. Currently available information regarding eligible activities for the CDBG-DR programs is outlined in the Action Plan. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

PRDOH values a positive working relationship with municipios and looks forward to working with them to serve the people of Puerto Rico throughout the life of the recovery process.

Comment: #092_10-15-18_ALC Legal Services Group PSC

Summary: On 10/15/18, ALC Legal Services Group PSC submitted a proposal which outlines uses of recovery funds to increase the resiliency of the Infrastructure and Housing as well as to support Economic Recovery. The legal services group is working with Ponce cites current FEMA work they are doing with the municipality of Ponce. They also acknowledge the expansiveness of the amendment to the first action plan in programs proposed.

Infrastructure:

They cite the need for enormous need for correct zoning codes especially for structures to be identified whether they fall in flood zones and the development of area plans. Of particular focus they cite rural areas in need of extensive planning: Pastillo de tibes, Rio Chiquito, El Hoyo, Real y Cerillos, La playa de Ponce Los Meros, El Tuque and others. They would like consideration for the distribution structure of funds to Municipios like Ponce who have the capacity and administrative staff to manage these funds and attend to the needs of their constituents.

They also suggest aligning the federal environmental requirements with the process for permits with the office of permit management so that both can conclude their assessments simultaneously.

Housing:

They cite the need to respond to the real needs of the community and citizens at large and while construction and rehabilitation are proposed, an emphasis on utilizing the available housing developed. They acknowledge the great alternatives proposed in the amendment.

Economic Recovery:

ALC emphasizes the need to use local firms so that funding will impact the local economy.

PRDOH Response: Projects suggested informed PRDOH during development of the Housing Programs, Economic Recovery Programs, and Infrastructure Programs. PRDOH values positive working relationship with municipios and looks forward to working with them to serve the people of Puerto Rico throughout the life of the recovery process. Municipal projects may be eligible to receive funding under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors. Currently available information regarding eligible activities for the CDBG-DR programs is outlined in the Action Plan. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #093_10-15-18_Emilio Colón-Zavala (Asociación de Constructores De Puerto Rico)

Summary: On 10/15/2018, the Puerto Rico Builders Association submitted a proposal which outlines results of studies conducted regarding Puerto Rico's and suggestions towards construction standards, construction costs, planning programs, housing programs, Economic Development Programs, Workforce Development, and Infrastructure Coordination. To achieve a more resilient Puerto Rico, the proposal suggests the following program activities:

Planning:

- *Perform a comprehensive study of Fair Market Rents and Income Limits.*
- *Perform a comprehensive study of the Applicability of Wind Load Calculation Methodology in ASCE 7-2016.*

Housing:

- *Eradicate illegal construction and provide adequate access to code-compliant construction.*
- *Increase opportunities for relocation assistance.*
- *Establish a voucher program to allow those who lost their homes as a result of Maria an opportunity to secure housing that is built up to code and not located in a high-risk area.*
- *Create a mortgage guarantee program.*
- *Provide loans to homeowners to complete home repair. Loans should be available for single family and rental properties.*

- *Subsidize mortgages to reduce risk of foreclosure.*
- *Assistance to families to obtain legal title to owned property.*
- *Create mixed use developments in urban centers. Developments may be used for mixed residential/commercial use or as business incubators.*

PRDOH Response: Thank you for your comments, which informed development of several programs in the Action Plan. The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct code-compliant homes or provides a voucher for voluntary relocation out of hazard-prone areas. This program is supported by the Title Clearance program, which assists families in obtaining legal title to their property. The Mortgage Catch-Up program provides mortgage payment assistance to homeowners at risk of foreclosure and the Homebuyer assistance program provides assistance with down payments and/or closing costs associated with the purchase of home.

Infrastructure:

- *Install green energy sources such as solar panels.*
- *Allow municipalities to gain access to infrastructure that will result in resiliency.*

Economic Recovery:

- *Provide financial assistance to small and medium sized businesses.*
- *Provide educational programs regarding financial management and economic development.*
- *Provide proper workforce training.*
- *Increase eligibility for these programs by using a limit of 120% of AMI.*

PRDOH Response: Economic Development programs, including the Small Business Loans program and Workforce Training Program, are outlined in the Action Plan. The Community Energy and Water Installations program provides renewable, sustainable energy options, like solar, to residential and small business structures on the island.

Comment: #094_10-15-18_Ineabelle Ortiz

“When will you begin receiving applications? Where can I get one? To who or where should I deliver it?”

PRDOH Response: Currently available information about the CDBG-DR programs can be found in the Action Plan.

Comment: #095_10-15-18_Department of Housing and Community Development (Municipio de Carolina)



Summary: On 10/15/18, the Director of Housing and Community Development of the Municipality of Carolina submitted a proposal which contained information on unmet needs in Carolina, proposed activities to be funded under CDBG-DR, and the municipality's capacity to manage federal funds.

The Director of Housing and Community Development of the Municipality of Carolina requests CDBG-DR funding be used to complete the following projects. A description of project plans, project budgets, project locations, and summary of impacted populations associated with these activities is outlined in the proposal.

Housing Funds Requested: \$433,550,000.00

- *Rehabilitate existing housing units affected by hurricanes Irma and Maria.*

Infrastructure Funds Requested: \$11,500,000.00

- *Improvements to drainage system.*

Economic Recovery Funds Requested: \$3,900,000.00

- *Rehabilitate building into a commercial center located in the urban center of the municipality.*

PRDOH Response: Projects suggested informed PRDOH during development of the Homeowner Rehabilitation, Reconstruction, or Relocation program. PRDOH values a positive working relationship with municipios and looks forward to working with them to serve the people of Puerto Rico throughout the life of the recovery process. Municipal projects, like those listed here, may be eligible to receive funding under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #096_10-15-18_Pontificia Universidad Católica de Puerto Rico (PUCPR)

Summary: On 10/15/18, the Pontificia Universidad Católica de Puerto Rico (PUCPR) submitted a whitepaper, submitting a list of services that could be provided, stating the need for academia to be present in the reconstruction of Puerto Rico and offering assistance to the Puerto Rico Department of Housing. The list of services is broken down as:

Housing:

- *Repair, reconstruction, and relocation.*
- *Title acquisition.*
- *Housing inspections.*
- *Housing designs.*
- *Vacant lot designs that do not pass inspection.*
- *Promissory note and lien.*

- *Additional costs in excess of caps.*
- *Mortgage legal assistance.*
- *Social interest housing designs.*

Economic Recovery:

- *Operational assistance for business incubators.*
- *Job training (tourism, medical professionals, others)*

PRDOH Response: Thank you for the offer of support. PRDOH values a collaboration with the academic community and looks forward to a positive working relationship with them throughout the life of the recovery process. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #097_10-16-18_José Sánchez González (Municipio de Manatí)

Summary: On 10/16/2018, José Sánchez González, mayor of Manatí, submitted a proposal including community impact from the effects of hurricane María, and projects to be funded under CDBG-DR.

Housing Funding Requested: \$18,772,500.00

- *Construction of temporary housing for students on a First Responders career track.*
- *Rehabilitation of housing up to revised construction codes with the inclusion of energy efficiency components.*
- *Creation of a temporary housing rental program for families without homes.*

Infrastructure Funding Requested: \$20,575,000.00

- *Construction of a new integrated emergency operations center.*
- *Construction of 8 remote emergency operations centers.*
- *Rehabilitation of 3 schools to be converted into Multidisciplinary Centers for mental stabilization and assistance for those affected by hurricane María.*
- *Installation of security and strategic monitoring systems.*

Economic Recovery Funding Requested: \$38,875,00.00

- *Loan program for small and medium businesses.*
- *Acquisition of properties and incentives program for business owners.*
- *Construction of a hotel.*
- *Art program to revitalize the vacant and deteriorating structures of the downtown area.*

PRDOH Response: Thank you for your comment. Programs outlined in the Action Plan are not geographically restricted; residents of Manatí may be eligible to receive assistance.

Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #098_10-15-2018_José A. Morales Ríos (Equipo de Natación Llaneros de Toa Baja)

Summary: On 10/15/2018, José A. Morales Ríos submitted a whitepaper stating the damages suffered by hurricanes Irma and María which resulted in the closing of the Olympic Pool of Levittown, due to damages. José A. Morales Ríos asked for CDBG-DR funding for the repair of the pool for the community.

PRDOH Response: Municipal projects may be eligible to receive funding under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors. Currently available information regarding eligible activities for the CDBG-DR programs is outlined in the Action Plan. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.


Comment: #099_10-15-2018_Iglesia Metodista Levittown

Summary: On 10/15/2018, the Methodist Church of Levittown submitted a whitepaper stating the damages suffered by hurricane María to the church, the denial of assistance from other sources, and requesting the use of CDBG-DR funding for the rehabilitation of the church.

PRDOH Response: The Community Resilience Centers program provides funding for community resilience centers across the island to support communities during disasters with provision of critical functions and increasing social resilience through potential expansion of year-round day-to-day functions. Currently available information regarding the programs is outlined in the Action Plan. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #100_10-15-2018_Yarilín Colón Rodríguez (Comunidad de Toaville Toa Baja)

Summary: On 10/15/2018, Yarilín Colon Rodriguez, representing the Community of Toaville Toa Baja, submitted a whitepaper stating the devastating effects of hurricane María and provided the following recommendations for the betterment of the community:

- *Channelization of the La Plata River.*
 - *Cleaning of the body of waters.*
 - *Rehabilitation of the sewer system.*
 - *Cleaning of the vacant lots.*
 - *Emergency services for the senior citizens or the handicapped.*
- 

- *Reevaluate the reasons why help was denied to the citizens.*

PRDOH Response: These proposed projects have informed PRDOH during the development of the Infrastructure Programs. PRDOH values the participation of all community-based organizations and looks forward to a working relationship at various levels throughout the life of the grant. Municipal projects, like some of those listed here, may be eligible to receive funding under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #101_10-15-2018_Juan Camacho Moreno (Toabajeños en Defensa del Ambiente)

Summary: On 10/15/2018, Juan Camacho Moreno submitted a whitepaper stating the effects felt in Toa Baja after hurricane María and recommendations of projects to be undertaken. Juan Camacho Moreno proposed projects housing, infrastructure, and other activities such as the channelization of the La Plata river, reconstruction of housing with resilient materials, establishment of a professional orientation office for housing construction codes, installation of solar panels to all housing, the dredging of the Levittown lake, reconstruction of Punta Salinas, cleaning of the Balneario de Punta forest, and pavement of roads.

PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct code-compliant homes or provides a voucher for voluntary relocation out of hazard-prone areas. The Community Energy and Water Installations program provides renewable, sustainable energy options, like solar, to residential and small business structures on the island. Infrastructure initiatives are outlined in the Action Plan.

Comment: #102_10-15-18_Kelvyn X. Martinez Medina

“I’m writing because I’m interested in a job with the Department of Housing for this new project that’s about to begin. I have work experience with inspections for Housing, since I’m currently working part-time with Tu Hogar Renace (STEP) Program on the Housing Department side. I received guidance from a current employee from the Puerto Rico Department of Housing and he gave me this site as reference to search for a job. I also have a Bachelor’s Degree in Business Administration with a concentration in Management. I would appreciate any kind of answer. My contact number is ... and my personal ...”

PRDOH Response: Parties interested in employment opportunities available with PRDOH should contact the PRDOH Human Resources Department.

Comment: #103_10-15-2018_Puerto Rico por el Derecho a la Vivienda Digna (PRODEV)

Summary: On 10/15/2018, Puerto Rico por el Derecho a la Vivienda Digna (PRODEV) submitted a whitepaper highlighting the importance of including NGOs, community leaders, and universities

to participate in the management of CDBG-DR fund allocations, proposed special community housing projects with specified locations, the need to address mitigation or rehabilitation of homes in place first to not displace families, the use of local firms or labor for projects, and protecting the coasts as a natural resource.

PRDOH Response: These proposed projects have informed PRDOH during the development of the Housing Programs and Infrastructure Programs. PRDOH values the participation of community-based organizations, NGO's, and universities and looks forward to a working relationship at various levels throughout the life of the grant. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #104_10-15-18_Marangely Camacho

"I need help"

PRDOH Response: Currently available information about the CDBG-DR programs can be found in the Action Plan.

Comment: #105_10-15-2018_Urb. Campanillas

Summary: On 10/15/2018, The residents of the Campanillas neighborhood submitted a white paper stating during and after hurricane María, the community did not have trouble with flooding, but requested aid for the following:

- *Weak and susceptible electric system*
- *Lack of community lighting*
- *The dredging of the bodies of water*
- *Faulty drainage system"*

PRDOH Response: Municipal projects, like some of those listed here, may be eligible to receive funding under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors. Infrastructure initiatives are outlined in the Action Plan.

Comment: #106_10-15-18_Sandra Santiago (Serrano Juarbe Family)

"As a volunteer of the streets mentioned above in Lagos de Plata Urbanization and minister of the Sagrada Eucaristía de la Parroquia Santísima Trinidad de Levittown, Toa Baja, P.R., I have provided follow up to the Serrano Juarbe family, since Hurricane María and the flooding occurred on September 17, 2017.

Current needs:

- *Fixing cracks on the roof inside the house, part of the house still gets wet when it rains.*
- *Waste water problems in the car port.*
- *Need for an Access ramp and exit from the house for Mrs. Juarbe with her wheelchair.*
- *The house needs painting, at least the exterior.*

General information about the Serrano Juarbe family:

The Serrano Juarbe family consists of three people with disabilities. There are two elderly persons with disabilities and an adult son that had cancer surgery. The family has a low socioeconomic level. Mrs. Juarbe is 77 years old. She's in a wheelchair because of balance problems. Mr. Serrano is 86 years old and they say he has memory problems. He's shown to be independent in his basic needs, but the family expresses he has bad judgement when managing his money. His son is 59 years old with a history of cancer. He's the one who runs his parent's errands, but since the surgery, he depends on neighbors to move around.

Problems during hurricane María:

The roof of the house was further impacted, it already had cracks along the whole roof, above and inside the whole house, but the hurricane affected it much more. In the flooding, they lost beds, clothing, food, cabinets and motorized wheelchair.

Through neighbors, members of Parroquia Santísima Trinidad, and Mrs. Pilar, from AARP, they received beds, some linens, clothing for them, and food. We cleaned, because they have a great problem with waste water coming out of the pipes in the car port, which got worse during the flooding.

Grupo Hogar Renace fixed the roof a little, but it still needs fixing of the big cracks in the ceiling of the whole house, through which some of the areas get wet, especially in the bedrooms, as Mrs. Juarbe explains.

The doctor assisting Mrs. Juarbe in her home, ordered her a new wheelchair.

The Mayor's office was able to get her Housekeeping service for two half days a week and she receives food stamps. They are also receiving transportation to medical appointments. It would be helpful to receive lunch at their house, since sometimes they don't have transportation to go to the supermarket.

Three weeks ago, debris removal was requested to prevent falls since they still have their mattress and mirror on the sidewalk, which limits their mobility in front of their house; but they haven't received the service."

PRDOH Response: The Home Repair, Reconstruction, or Relocation program prioritizes elderly applicants and provides assistance to homeowners to rehabilitate or reconstruct code-compliant homes or provides a voucher for voluntary relocation out of hazard-prone areas.

Comment: #107_10-15-18_Marely Martínez (Office Copy Express, Inc.)

"I would like to know where the offices are located or where I should go to get an application or information regarding the CDBG funds.

I appreciate your prompt response."

PRDOH Response: Currently available information about the CDBG-DR programs can be found in the Action Plan.

Comment: #108_10-15-18_Zolyamar Aulet Robles (ZAR Creations)

"The CDBG-DR Action Plan Draft includes the topic of financial revitalization. I understand that one of the most important aspects for the financial revitalization is the help that can be provided to small business owners that were affected by hurricanes Irma and María, mostly to those who have reinvented themselves in their own land, to help their country rise.

In our case, we're not talking about help for physical or structural damage, but of financial aid for loss of opportunities with potential clients because all of us, to a greater or lesser degree, were affected by the hurricanes. The funds many businesses had for their advertising and marketing had to be diverted to cover unexpected needs that arose after the hurricanes...

This assistance would be a great opportunity for small business owners, like us, and as a consequence, an economic benefit for our country, and in our case, a great contribution for our population's mental health, which has been greatly affected after these hurricanes.

So you understand a little more about our situation, which I'm sure it's very similar to that of many small business owners in Puerto Rico, I tell you that my husband, Rafael G. Rodríguez Martínez, and I, Zolyamar Aulet Robles, are a couple of professionals from Jayuya who have reinvented our company ZAR Creations. ZAR Creations is a company looking to have a positive impact in our lives and in our world, through its creations. It's a completely Puerto Rican company dedicated to the creation and distribution of motivational books presented in an entertaining way through alphabet soups.

Its first product, Motivigrama (which has been greatly accepted), is an innovative concept. Not only is it a self-help tool directed to improving the spiritual and emotional health of people, but when presented in a fun way through word games, makes the information shared be captured and assimilated more easily. It also helps the brain produce new neurons, something key for good brain health...

ZAR Creations was launched on the summer of 2017 with the first edition of the Motivigrama: Self-Help Tools. Now the second edition is being distributed, called Motivigrama: As I See It, which opens the doors to the following editions that we intend to launch every two months.

In order to launch this project, we have invested all our capital and used all of our credit because we truly believe in it, and because we have experienced the need in our country of having positive words, of encouragement; and the demand for mental exercises, such as alphabet soups to prevent Alzheimer.

With the first edition of the Motivigrama we received several suggestions from our clients so the book would be better received in the market. We took the suggestions presented into

consideration and we applied them in the second edition. From the first to the second edition, we doubled the books thickness (which increases the cost of printing) and we contracted the services of a distributor so we would have better coverage (which reduces the profits); and all of this while keeping the same sales price for the public in order to stay in the competitive market...

This is why we look for advertisers for our book, to be able to complete the capital for its printing, and also to keep this project alive. Our current profits without the advertisers is negative. Since we are starting, and since the distributor doesn't pay us until it gets paid (we will easily see our first check in 5 or 6 months), we haven't accumulated capital to continue investing in the next printing sessions.

In the second edition of Motivigrama, 3 companies were advertised in our book: Plaza LasAméricas, TransCita and Cooperativa de Seguros Múltiples, but we needed 6 advertisers.

So we had two options: (1) either complete the money charging it to our credit card, (2) or let the project die. So, as you can imagine, we risked everything. It's a beautiful project (and we would say even necessary during the times we're living in) that deserves to be supported. For the third edition of Motivigrama we have 2 advertisers: Plaza Las Américas and Abbott, with its product Glucerna. We need 4 more advertisers in order to complete the capital for printing the book, and we're running out of time to be able to complete the edition of November, 2018.

Puerto Rico's recovery should not only be physical, but also emotional. We hope you consider us and that we can receive the necessary financial backup so this beautiful project doesn't die, or a Puerto Rican small business that has tried to get ahead during these past years.

We can't afford another debt. And you don't know how many doors we've knocked on. We just ask for an incentive to complete the capital for printing the book for a definite time, so the project can continue and stabilize when it's time. We need that little push at the beginning, so we can then continue walking alone and supporting our country that needs it so much..."

PRDOH Response: The Small Business Financing program provides grants and/or loans for eligible small businesses. Information available about this and other economic development programs is outlined in the Action Plan.

Comment: #109_10-16-18_Hon. Jesús E. Colón Berlingeri (Mayor, Municipio of Orocovis)

Summary: On 10/16/2018, the Hon. Jesús E. Colon Berlingeri, the mayor of Orocovis, submitted a whitepaper that elaborated on the effects of hurricane María and the municipality's intention of participating in the programs funded through CDBG-DR. The whitepaper stated the use of CDBG-DR funding for the rehabilitation of households, revitalization of communities, channelization of bodies of water and for tourism based economic initiatives. The whitepaper concluded with the 30-year experience of the municipality's staff with managing federal funds and readiness to assist with the CDBG-DR funds.

PRDOH Response: PRDOH values the participation of all municipios and looks forward to a working relationship at the municipal level throughout the life of the grant. Municipal projects, like some of those listed here, may be eligible to receive funding under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical

recovery activities aimed at reinvigorating urban centers and key community corridors. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #110_10-16-18_Evelyn Rivera Arias (ICDC El Valle Verde, Candelaria Arenas, Toa Baja)

Summary: On 10/15/2018, Evelyn Arias Rivera, community leader for the ICDC EL Valle Verde en Candelaria Arenas Toa Baja, PR, submitted a document titled “Construyendo Y Transformando A Puerto Rico” including the effects of Hurricane María on the communities of Toa Baja, the demographics and current needs of those affected and recommendations for activities to be funded by CDBG-DR. The following recommendations without a requested funding amount were suggested:

- *Construct cement-based housing in safe locations.*
- *Immediate debris removal.*
- *Creation of an action plan for all community volunteers of Toa Baja.*
- *Consistent emergency workshops for volunteer teams.*
- *Channelization the river in between the municipalities of Toa Baja and Dorado.*

PRDOH Response: The Home Repair, Reconstruction, or Relocation program prioritizes elderly applicants and provides assistance to homeowners to rehabilitate or reconstruct code-compliant homes or provides a voucher for voluntary relocation out of hazard-prone areas.

PRDOH will take these comments into consideration during further development of programs or during development of new programs if additional funding becomes available.

Comment: #111_10-16-18_Carmen R. Rosado Sánchez (Comité de Desarrollo Integral Comunitario Las Vegas Inc.)

Summary: On 10/16/2018, Carmen R. Rosado Sánchez submitted a proposal titled “Comunidad Las Vegas, Cayey” that consisted of a description of Comité de Desarrollo Integral Comunitario Las Vegas Inc’s (“CDIC”) history, community outreach, population census, and an interior design layout for Comuna Educativa Cultural y Empresarial Cajey (C.E.C.E. Cajey), long term objectives and two initiatives to be funded by CDBG-DR. The first initiative, C.E.C.E. Cajey, consisted of a working commercial kitchen to sell meals to businesses and provide meals to those in need as well as sets up an educational classroom for the community. The second initiative, Vega Verde, is in relation to the development of farmland to be in conjunction with C.E.C.E. Cajey. Other activities to be funded under CDBG-DR are a retaining wall, renewable energy sources, farming equipment and machinery, operational expenses, paint and kitchen equipment.

PRDOH Response: PRDOH values the participation community-based organizations and looks forward to a working relationship at various levels throughout the life of the grant.

The Re-grow PR Urban-Rural Agriculture program is a food security initiative which may provide assistance to urban or rural, large- or small-scale agriculture, livestock or aquaculture installations. This program as well as all Economic Recovery Programs are outlined in the Action Plan. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #112_10-16-18_Ineabelle Ortiz

"Mortgage..."

I'm sending proof of the dealings I'm making with the government program I mentioned last time we spoke. I apologize for not calling you again, but it's difficult because of my work schedule. As I told you, I get out at 4:30 pm and it may be late when I can call you. Thank you for your understanding."

PRDOH Response: For more information about CDBG-DR programs outside of public comment period you may contact PRDOH by phone at 787-274-2527, or may comment anytime by email at infoCDBG@vivienda.pr.gov, or by mail at P.O. Box 21365 San Juan, PR 00928-1365.

Comment: #113_10-16-18_Marangely Camacho

"To receive the assistance, information"

PRDOH Response: Currently available information about the CDBG-DR programs can be found in the Action Plan.

Comment: #114_10-16-18_Moraima Rodríguez Vélez

"I'm requesting information regarding some information I read in a news story that mentioned aid for teachers, police officers and other categories of public officers, help to buy a house.

Please, if you can tell me where I can go or contact, dates for applying, etc. I live in Bayamón."

PRDOH Response: The Homebuyer Assistance Program targets critical recovery sectors including and provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home. Information about the program can be found in the Action Plan.

Comment: #115_10-16-18_Beatriz Llenín Figueroa

"This is to request the immediate publication of the APPENDICES of the Action Plan for Disaster Recovery in order to evaluate the contents of public participation until now while I prepare my contribution, to be sent before the October 21 deadline. Thank you in advance for your diligent and urgent attention to this matter."

PRDOH Response: All appendices, including all public comment and PRDOH responses are available as part of the final draft version of the Action Plan, which was submitted to HUD on November 16, 2018. The final draft Action Plan and all appendices are available for public consumption at www.cdbg-dr.pr.gov.

Comment: #116_10-16-18_Dr. Carlos Ignacio Pesquera Morales

Summary: On 10/16/2018, Dr. Carlos Ignacio Pesquera Morales submitted a whitepaper including Dr. Morales' professional resume, seven recommendations, table of current Action Plan Substantial Amendment #1 budget, a descriptive individual analysis of each program category and four specific programs (Critical Infrastructure Resilience, Community Resilience Centers, City Revitalization, and Puerto Rico By Design) in the Substantial Amendment that the municipality of Orocovis should directly participate in. Dr. Morales's recommendations are as follows:

- *The development and publication timelines for the implementation of each program in the Substantial Amendment.*
- *Define the administrator of the Critical Infrastructure Resilience Program, such as the Infrastructure Financing Authority.*
- *The utilization of local firms to develop transparent strategies for the successful implementation of the Action Plan.*
- *The Puerto Rico Department of Housing (PRDOH) should prequalify specialized firms and establish reasonable cost guides.*
- *The PRDOH should proactively assist in the monitoring of contracted firms.*
- *The fiscal health of the municipalities should be considered to establish financial mechanisms that do not depend on the solvency of those municipalities.*
- *Establish measures that permit for the most efficient use of the CDBG-DR funds to have the most long-term economic impact.*

PRDOH Response: Thank you for your comment. The Critical Infrastructure program will be overseen by PRDOH, following the subrecipient distribution method outlined in the Action Plan. PRDOH must follow HUD-approved procurement guidelines to select firms contracted to assist with the recovery effort. PRDOH is committed to efficient and transparent administration of CDBG-DR funding. Information regarding procurement, program expenditures, program progress, and other information related to the CDBG-DR grant will be posted to www.cdbg-dr.pr.gov, as it becomes available.

Comment: #117_10-16-18_Lewis Milford (Clean Energy Group)

Summary: On 10/16/2018, the Clean Energy Group submitted a proposal which outlines the supported use of recovery funds for solar and storage incentives and steps the Commonwealth could take to design and secure the use of solar and storage installations. To achieve a more resilient Puerto Rico, the proposal suggests the following program activities:

Housing and Infrastructure:

- *Implement a design process to develop the most effective, equitable, and efficient solar and storage incentive program for the Commonwealth.*

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide homes and businesses with sustainable, renewable energy sources, including solar. Currently available information about the programs are outlined in the Action Plan.

Comment: #118_10-16-18_Karla M. Saldaña Martínez (Mayor's Office, Toa Baja)

"Today we will be covering relevant items to the damage caused after Hurricane Maria, on September 20, 2017.

As everyone knows, our community, Campanillas, lives under the poverty level and it's included among one of the communities that were flooded when the La Plata river overflowed and is considered among the most affected by the flooding.

After the hurricane, we're still with: blue tarps, very little illumination on the streets, which causes a safety problem. At this time, there is much debris piled up on sidewalks, which is causing health problems because of vermin, flooding problems when the sewers get clogged up. Many people who had wood and zinc structures lost them after the storm and are now rebuilding their houses, but because of lack of financial resources and labor they haven't been able to rebuild them.

It's recommended, that if there are any programs or projects available to address these needs, we are considered as a community. The church as a faith community, has supplied us in several occasions with commodities and non-perishable foods.

It's crucial to follow up on the canalization of La Plata River. Our community is threatened with the devastation by flooding even without a hurricane. The strong and consistent rains can cause material losses and life loss.

The lecture is the result of the observations made in the Campanillas community, done with the help of residents and under visual contact supervision, to which I'm witness.

I want to thank the U. S. Department of Housing (HUD)."

PRDOH Response: Thank you for your comment. The Home Repair, Reconstruction, or Relocation program is dedicated to serving low- and moderate-income applicants and provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas.

Comment: #119_10-16-18_José A. Miranda Miranda (Casa Aibonito/Hogar Aurora)

"I come representing the two housing projects I administer, described above, both in the town of Aibonito. The first one is Hogar Aurora, a housing project 811, with 20 units, for people 21 years of age and older with a physical disability and low income. The second is Casa Aibonito, housing project 202, with 99 units, for people 62 years of age and older and low income.

Both projects function with a federal grant, which allows for a limited operational budget. The reason for my presentation in these public hearings is to present the situation the housing projects are experiencing that provide services to the people mentioned above.

After hurricane passed through our area, the people we serve had great needs. Although they had a safe roof, they suffered greatly because of lack of power, water and even food.

Imagine a 90-year-old person going up stairs to a seventh floor where he lives, because it was nearly impossible to keep the emergency generator running 24 hours because the diesel it needed wasn't accessible. Add to that, not having the generator running all the time, meant no water, since the water pumps work with electricity. To make matters worse, the emergency generator only powers certain common areas, so they couldn't cook either because their units don't receive power from the generator.

All of this created a situation for our elderly population and people with physical disabilities that, even though we did everything possible to satisfy their needs, it was very difficult to give them a better quality of life during this time.

We also suffered because there was no water available. Both projects have cisterns, but they were not enough to cover more than three days of demand for that service.

I ask you to see this picture: no power, rationed emergency generator, no facilities to make their food, with food for three days at the most, and water rationed, because of the pump system that needed power as well as the lack of a cistern with more capacity.

On the other hand, in recent visits by FEMA personnel to our facilities, they recommended having a diesel tank for the generator with a minimum capacity for 10 days. We currently have capacity for two days.

In face of all of this, we come before you to ask that you consider the nursing homes and housing projects, such as ours when distributing the funds for the reconstruction of our country, since it will allow us to develop projects that minimize the suffering of our most vulnerable populations.

In our specific case, we examine the possibility of installing a higher capacity emergency generator than the one we have right now, which will allow us to generate power for a whole multi-story project in all of the units. We have the approximate costs of this project and in the case of Hogar Aurora we need approximately \$225,000 and in the case of Casa Aibonito we need \$350,000.

Regarding the diesel tanks with the recommended capacity, their purchase and installation is possible at an approximate cost of \$35,000 per project.

Finally, the purchase of higher-capacity cisterns would guarantee a better quality of life for all our residents in both projects. We estimate improvements like this can reach approximately \$25,000.

In summary: The Casa Aibonito project estimates the amount of \$410,000 to cover the needs described above. Hogar Aurora estimates the total amount to be \$285,000."

PRDOH Response: The Multi-Family Repair, Rehabilitation, and Resilience program offers assistance for rehabilitation, reconstruction, or long-term resilience measures for multi-family housing. Information currently available about the program is outlined in the Action

Plan. Program guidelines will be published to www.cdbg.dr.pr.gov after the program is approved by HUD.

Comment: #120_10-16-18_Daniel Estrada (Pura Parcha)

"This is to inform you of my intention of participating in the proposal presentation to be developed through the "Community Development Block Grant- Disaster Relief" ("CDBG-DR").

I propose to develop the first passion fruit pulping machine in Puerto Rico. To speed the processing of the passion fruit as well as provide opportunities for the "Pura Parcha" project and other farmers dedicated to cultivating the same fruit, can have access to a technology that has enough processing capacity to allow them to increase their harvests and production.

BACKGROUND

The "Pura Parcha" project was founded in the year 2010, with the purpose of cultivating passion fruit and offering a different product for the Puerto Rican palate. Eight years later, we enjoy all the effort of getting the biggest harvest of passion fruit in Puerto Rico. During the next year, our goal is to increase the production capacity of passion fruit from 11 acres located in Rte. 125 of Bo. Hato Arriba- Paseo Central Sector, in San Sebastián, P.R., currently producing, and convert them in 21 acres. By developing the processing plant, we would have the ability to process the total production of the "Pura Parcha" project and from other farmers dedicated to cultivating this fruit.

JUSTIFICATION

Puerto Rico has favorable conditions for growing passion fruit commercially. However, its production has decreased significantly. This is a consequence of the scattered production of the crop, the organizational character of the industry, the impact from Irma and María and the unwillingness of an industrialized system to process raw materials. The harvest of passion fruit, cleaning the skin, cutting and storing the pulp is done by hand and/or artfully. Processing passion fruit, regarding its method and duration, influences the quality of the raw material extracted. The domestic production model currently used to process the fruit requires large capital and time investments while the amount produced results inadequate to supply the needs of the market.

The success of the passion fruit industry lies on increasing the production and processing capacity performed by each farmer. Establishing an automated processing system will provide the necessary fluidity to respond to the need and demand of the clients with the agility and quality it requires.

PROJECT DESCRIPTION

Our general objective is to transform and commercialize the passion fruit supported by industrialized machinery in order to satisfy the needs of the local culinary market with the amount of pulp requested and under the highest quality standards.

The automatization project includes implementing the following elements:

Structure – Design and construction of new facilities for processing passion fruit.

Equipment – Specialized equipment for processing the fruit semiautomatically.

Sustainable elements – Among the elements that will provide sustainability to the project are the purchase of

Renewable solar power equipment to minimize energy costs.

Rainwater collection system to provide irrigation for the crops planted.

Transportation: Refrigerated carrier equipment to facilitate product delivery in its best state to different places around the island.

The development of the proposed project will have an estimated cost of \$1,040,000.00. With this injection of money, the annual production is estimated to increase by 50% with a total yield of 661,500 pounds of fruit and 330,750 pounds of pulp. The projected sales estimated volume is \$1,653,750.00. The passion fruit harvest months are from May to January and the excess pulp will be stored to provide for the months of February to April when there's no harvest.

The final product will be commercialized to restaurants identified throughout Puerto Rico that offer local natural juices to their clients. For more information, please contact me."

PRDOH Response: The Re-grow PR Urban-Rural Agriculture program is a food security initiative which may provide assistance to urban or rural, large- or small-scale agriculture, livestock or aquaculture installations. This program as well as all Economic Recovery Programs are outlined in the Action Plan.

Comment: #121_10-17-18_ Municipio de San Sebastián

Summary: On 10/17/2018, the Municipality of San submitted a white paper requesting CDBG funding to complete the following activities:

Infrastructure Funding Requested: \$26,447,047.00

- *Relocation and improvements to sewage system.*
- *Rehabilitation of sewage pumping station, up to compliance with EPA regulations.*
- *Channelization of the river Culebrinas.*
- *Mitigation of areas susceptible to landslides, such as the Campo Alegre sector.*
- *Demolition and replacement of bridges.*
- *Reconstruction of unused schools to emergency refuge centers.*
- *Acquisition and installation of solar panels and cisterns to the Luis Aymat coliseum.*

PRDOH Response: Municipal projects, like some of those listed here, may be eligible to receive funding under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #122_10-17-18_Ambar Félix

“Has the orientation for the \$50,000 program for buying a property begun? Do you have the details?”

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home. Information about the program can be found in the Action Plan. Further definition regarding application periods, required documentation, and the process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #123_10-17-18_Elba Quiñones

“We need to be together. I want to know my right to have a house. I think is not fair only for nurse and fireman teachers and policeman. We all in the same boat. I live in a rented house and I want to have a house because I was a nurse in New York a year ago. I retired. I had to move where I was because I lost everything. Plus I, Revda Elba Quiñones Capellana, am a certified doctor.”

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home. Assistance under this program is not limited to those employed in critical recovery sectors. Information about the program can be found in the Action Plan.

Comment: #124_10-17-18_Hilchia Correra

“This is to request an orientation about the federal funds assigned for housing assistance for the people of Puerto Rico. I’m interested in buying a house and I need that aid to be able to make that purchase, I’m a single mother, to contact me, you can call me at...”

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home. Information about the program can be found in the Action Plan.

Comment: #125_10-17-18_Jonathan Álvarez

Summary: On 10/17/2018, the ELI Foundation submitted a proposal which outlines studies conducted and proposed suggestions regarding the elderly and disabled and the hinderance of their participation in Federally funded programs. To achieve a more resilient Puerto Rico, the proposal suggests the following program activities:

Multi-Sector:

- *Promote real opportunities for housing, infrastructure, economic development, and protection for special needs populations.*

- *Collaboration of all sectors to improve the recovery of Puerto Rico.*
- *Develop social interest projects beyond housing.*
- *Guarantee equal communication of information and access to the use of these federal funds regardless of age or disability.*
- *Implement the highest standards of accessibility for all populations regardless of age or disability.*
- *Provide individualized and specialized services to persons with disabilities and special needs.*

PRDOH Response: PRDOH is committed to leading a collaborative, transparent recovery. Several programs outlined in the Action Plan, including the Home Repair, Reconstruction, or Relocation program, prioritize elderly applicants. Information regarding CDBG-DR funded programs, including information regarding procurement, program progress, ways to access assistance, overall expenditures and other information will be posted to www.cdbg-dr.pr.gov as it becomes available.

Comment: #126_10-18-18_Ponce Medical School Foundation, Inc.

Summary: On 10/18/18, the Ponce Medical School Foundation, Inc. submitted a proposal which contained information on the non-profit's history, assistance provided after the effects of hurricane María, and a detailed description of an activity to be funded under CDBG-DR. The Ponce Medical School Foundation, Inc. proposed the development and implementation of a Telemedicine program that would assist the rural and medical professional deficient areas on the island by connecting them to the vast medical network in Puerto Rico, in association with the Foundation. The program proposes to incorporate telecommunication technology to allow real time consultations.

Infrastructure Funding Requested: \$26,447,047.00

PRDOH Response: Information regarding infrastructure programs, including the FEMA Coordination and Critical Infrastructure Resilience Program is outlined in the Action Plan. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available. PRDOH will consider these comments during further development of the infrastructure programs or in development of new programs if additional funding becomes available.

Comment: #127_10-18-18_Municipio de Guayanilla

Summary: On 10/18/18, the Municipality of Guayanilla submitted a proposal which provided effects suffered by hurricanes Irma and María, municipal goals, and proposed activities to be funded under CDBG-DR.

Housing Funds Requested: \$30,250,000.00

- *Construction of new housing.*
- *Rehabilitation of housing, both for owners and renters.*
- *Relocation of families out of high-risk areas.*
- *Acquisition and rehabilitation of public nuisance properties.*
- *Community energy and water resilience installations.*

Infrastructure Funds Requested: \$62,000,000.00

- *Channelization of the Guayanilla River.*
- *Construction and/or rehabilitation of bridges, roads, and drainage systems.*
- *Reparation of hospitals, municipal police stations, and emergency management centers.*

Economic Recovery Funds Requested: \$4,075,000.00

- *Tourism and business marketing program.*
- *Strategic projects and commercial development.*

Planning Funds Requested: \$450,000.00

- *Municipal planning.*
- *Whole community resilience planning.*

PRDOH Response: Projects suggested informed PRDOH during development of the programs outlined in the Action Plan, including Home Repair, Reconstruction or Relocation Program, Community Energy and Water Resilience Installations, Tourism and Business Marketing Program, Strategic Projects and Commercial Development, the Planning Programs, and Infrastructure Programs.

Municipal projects, like some of those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors. Currently available information regarding these programs are outlined in the Action Plan. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #128_10-18-18_Addid Delgado

“I’m a state police officer. I’m interested in receiving more information about a benefit that Governor Rossello reported to buy a house with some assistance, requirements and when will it be available to request it.”

PRDOH Response: The Homebuyer Assistance Program targets critical recovery personnel, including police, and provides eligible applicants with closing cost assistance, down payment

assistance, or a soft-second mortgage to assist in purchase of a home. Information about the program can be found in the Action Plan.

Comment: #129_10-18-18_David Martínez Pérez

“It’s to get information about the assistance to buy a house for public officers since I lost my house because of the hurricane and what FEMA gave me is not enough to buy a house or even fix it.”

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home. Information about the program can be found in the Action Plan.

Comment: #130_10-18-2018_ASPIRA Inc. de Puerto Rico

Summary: On 10/18/2018, ASPIRA Inc. De Puerto Rico submitted a whitepaper including recommendations to the workforce training program and an addition of an urban and rural agriculture program. ASPIRA states that young people of ages 14-18 should be able to participate in the workforce training programs related to agriculture, tourism or any other option. The non-profit states that agricultural education is necessary for economic recovery and counts with 113 acres to tend to, with an estimated cost of \$7,000,000.00.


PRDOH Response: Thank you for your comment. PRDOH will take these comments into consideration during further development of the Workforce Training Program. Currently available information regarding this program is outlined in the Action Plan. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility and fund allocation as it becomes available.

Comment: #131_10-18-18_Erniezer Feliciano

“The purpose of this email is to make suggestions for the use of the CDBG funds.

- *The funds must be used as tools for the economic development and revitalization.*
- *Dead End investments must be avoided, like investments that don’t add any value.*
- *These funds should be added to funds from other programs, as well as interest from investors to maximize their use.*

Below, some of the projects that should be considered...

- *Revitalization of the capital as a door to PR.*
 - *Develop the arts in Santurce*
 - *There are endowments for this*
 - *Investor interest*
 - *Restoration of buildings to relocate businesses and housing to the area*
- 

- *Opportunities for galleries*
- *Marketing opportunities*
- *Return of investment through events, added value to real estate and urban setting*
- *Development of the Beach District*
- *From Condado to Isla Verde*
- *Area greatly impacted by flooding*
- *Investor interest*
- *Construction of mixed-use buildings*
- *Relocalization of businesses*
- *Return of investment through service for tourism, added value for real estate, urban setting and new residents*
- *Art Deco Triangle*
- *Miramar - Calle Loiza - Río Piedras*
- *Victims of urban neglect*
- *Revitalization of buildings to relocate businesses and housing*
- *Improving the local offer to tourists*
- *Improving college life in Río Piedras*
- *Return of investment through added value for real estate and urban setting*
- *State district in Puerta de Tierra*
- *Move the headquarters of the Government Branches to Puerta de Tierra*
- *Opportunities for consolidating agencies*
- *Return of investment through better communication between central offices in case of an emergency, economic activity for the APP of Bahía Urbana, urban setting*
- *Federal District in Hato Rey*
- *Work with the federal government to relocate their offices to the Hato Rey area*
- *Return of investment through construction, release of land, better communication in case of emergency, urban setting*

El Caño District

- *Major urban revitalization project.*
- *Together with the dredging of the bay improves transportation by boat*
- *Environmental value through the recovery of the estuary*

- *Creating a road network that maximizes the use of these lands*
- *Construction of mixed-use buildings*
- *Together with funds for nursing homes, affordable housing, SBA, among others*
- *Relocalization of businesses and housing*
- *Return of investment through tourist attraction in the San José Lagoon and paseo del Caño, urban setting, value for real estate*

Downtown San Juan in Isla Grande

- *Investor interest*
- *Financial injection in the Island through movement of port activity to MAZ, PSE, among others*
- *Establish location as a requirement for incentives (example: Centro de Seguros)*
- *Return on investment through transportation, construction, planning, urban setting*
- *Revitalization of Urban Centers in cities and towns*
- *Relocalization of housing and businesses*
- *Improving services for residents*
- *Combine with SBA,*
- *Establish location as a requirement for incentives (Example, tax rate)*
- *Integrated Services Centers*
- *Municipal and state transactions*
- *Emergency Response Center*
- *Coordination, essential product banks*
- *Empower municipalities to respond to their emergencies through equipment*
- *Transfer firefighters to municipalities*
- *Health Centers*
- *Establish location as a requirement for incentives*
- *Improve patient services*
- *Transfer medical emergencies to municipalities*
- *Return on investment through improving quality of life, added value to real estate, time for residents, response time*
- *Road network*
- *Tourist routes*

- *Simplify the numbering of roads, signage (Example, Panoramic Route)*
- *Complete dedicated routes (Example. North Coast along the coast)*
- *Return on investment through tourist service, broaden the tourist inversion*
- *Access to the mountains*
- *Broaden and improve the design of main access roads (Example, PR-149)*
- *Focus the funds in a good road instead of spending on mediocre roads.*
- *Return on investment through more financial activity in the mountains, less accidents, better emergency response*
- *Drawbridges*
- *Bridges that can be raised in case of emergency to prevent them from being washed away by strong currents*
- *Return on investment through response time in case of emergency, need for replacement in case of it being washed away*
- *Expressways and Highways”*

PRDOH Response: These comments, suggestions, and recommendations have informed PRDOH during the development of the CDBG-DR programs outlined in the action plan. PRDOH understands that recovery is multi-faceted and is committed to administering a collaborative, transparent recovery.

Comment: #132_10-18-18_Luz D Figueroa

“I would like with this new stage of reconstruction since those of us who couldn’t get a loan with FEMA because of low income, that we are allowed to build a two-bedroom concrete house since mine is made of wood but I lost everything inside.... I image it’s not going to be 30 thousand per home... that you can build with low income. I hope to receive good news that I can build my house out of cement. I already have the contractor.”

PRDOH Response: Currently available information about the Housing Programs can be found in the Action Plan.

Comment: #133_10-18-18_Michelle Mercado

“I need information about if there will be assistance for houses that were affected by Hurricane María. We are family of three, we have a 9 year old boy with special conditions. We’re living at my mother’s house temporarily. They’re building our house in cement but we still need help since they gave me the house plastered, I have the floor tile and for the bathroom, but I don’t have any more budget and I’m still missing the doors and windows. FEMA denied my assistance even after seeing that I lost practically everything inside my house. SBA gave me a loan and I had to get another one with a cooperative to finish and complete the money so they would build the house

in concrete since it was wood and only had one room. My father gave me my house, I don't have a deed on my name. The land is on my father's name and I have an affidavit that the structure is mine and it's registered in the CRIM. My husband is the only one who's currently working and I'm a housewife."

PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas.

Comment: #134_10-18-18_Normarie Mirabal

"I read the news about the proposal for the housing voucher program for public employees, where it states that if approved, preference would be given to police officers, teachers, paramedics, etc. It doesn't specify if the Bailiffs from the Puerto Rico Judiciary Branch would be included. We are law and order officers, according to Law Number 43 of 2010, which amends the criminal procedures and rules in order to define the figure of the law and order officer:

It reads as follows: Regarding these Rules, a law and order officer is any person who is in charge of protecting people, property and keeping the order and public safety, including but not limited to, every member of the Puerto Rico Police and Municipal Police, Special Investigations Bureau Agents from the Department of Justice and Bailiffs from the Judiciary Branch.

If the Bailiffs are not included, I hope you can include us taking into consideration that we are law and order officers and we want the opportunity to participate in this proposal. I understand that it's an opportunity we would have to mitigate the different financial situations of the public employees, which have become worse after Hurricane María because we lost homes, had material losses, extraordinary expenses, etc.

If the proposal was approved it would certainly be a great opportunity for all of these officers who have shown great efforts and worked hard to revitalize and keep up the country. It would increase the financial recovery and would help the working population of the Island."

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home. Although the program targets critical recovery personnel, others are not excluded. Information about the program can be found in the Action Plan. Thank you for your comment.

Comment: #135_10-18-18_George DeSantis (Energy Harness)

"My name is George Desantis, Rep. for Energy Harness, a Fort Myers Florida LED lighting manufacturer. Yesterday, I had a conversation with Jose Castro-Segarra the Business Innovation Officer to the Island. He informed me that there is government funding available for LED lighting upgrades to the island resulting from last year's Hurricane Maria. Energy Harness works with all of our customers covering the lighting gamete from consultation for the best solution to supplying direct sales of our products and installation. I am looking speak with the best contact to begin the

process for the lighting upgrades associated with the grant funding or other LED lighting upgrading needs. Attached is a company profile that will highlight a few of the fixtures and lamps that we manufacture.”

PRDOH Response: Information regarding procurement, including Requests for Proposals (RFP), will be posted to www.cdbg-dr.pr.gov. PRDOH encourages interested parties to monitor the website for opportunities.

Comment: #136_10-18-18_Carlos Martín (Urban Institute)

Summary: On 10/18/2018, the Urban Institute submitted a letter of support for the Puerto Rico by Design program containing suggestions based on the experience of implementing another Rebuild by Design program.

PRDOH Response: Thank you for your letter of support for the Puerto Rico by Design program. These suggestions will be considered during further development of the program.

Comment: #137_10-18-18_Francis J. Rullán Caparrós

Summary: On 10/18/2018, DDEC submitted a letter of suggestions for the Community Energy and Water Resilience Installations program containing recommendations to the development of the Action Plan. To achieve a more resilient Puerto Rico, the proposal suggests the following program activities:

Community Energy and Water Resilience Installations:

- *Energy resilience and water storage facilities should be available at the beginning of the program.*
- *Refrigerators should be efficient in terms of energy by integrating the equipment and systems mentioned in the program.*
- *Residents should have a wider spectrum of energy alternatives so their homes can be more resilient.*
- *DDEC should be a partner or a collaborative entity to perform administrative tasks for this program.*
- *The design, acquisition, and installation of renewable energy systems should connect to micro-grid networks to provide additional resilience to the system.*
- *Include educational campaigns alongside the program.*

PRDOH Response: Thank you for the comments. These suggestions and recommendations have been taken into consideration during final edits to the substantial amendment to the Action Plan.

Comment: #138_10-18-18_Ana Z. Rosa Padilla (Municipio de Hatillo)

“The Municipality of Hatillo, participated in the previous CDBG-DR Public Hearings in March and submitted in writing the need for federal funding to cover several projects.

However, we participated again in the October 16, 2018 Public Hearings at 9:00 am at the Centro de las Artes in Manatí.

Below are our comments:

1. In the federal funding award process, higher municipality participation is recommended. We have many years of experience managing CDBG funds. Monitoring and the Single Audit are a tool that measures the use, management and compliance of each Municipality with federal funds. The Municipalities have a Deep understanding of the specific needs of their communities; the strengths and weaknesses of each sector and barrio.

2. We ask funds to be assigned to mitigate the increasing coastal erosion problem.

For example: Gabion projects, Rip Rap, dunes, etc.

In our Municipality the following projects have experienced the sever impact of storm surge where areas are currently inaccessible.

These are:

- *Paseo del Carmen (the Marina)*
- *Urb. Mar Azul (Maguf Beach)*
- *Centro Punta Maracayo Camping*
- *Parque del Norte*

We appreciate the favorable consideration of our requests.”

PRDOH Response: PRDOH understands the expertise municipios have concerning the needs of local communities and as such, values the participation of all municipios and looks forward to a working relationship at the various levels throughout the life of the grant. Municipal projects, like those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #139_10-18-18_Luis A. Ruiz Ruiz (Comunidad La Yuca)

Summary: On 10/18/2018, Luis A. Ruiz Ruiz submitted a whitepaper stating the various infrastructure situations the residents of La Yuca community need assistance with and includes pictures related to these issues. The list of needs is:

- *Reconstruction of the bridge on Highway 505 (Carr. 505) km 1.9.*
- *Repair of bridge in the El Camino Viejo sector.*
- *Reconstruction of the bridge on the El Cedro road on Highway 505 (Carr. 505) km 3.9.*

- *Repair of El Camino Teissoniere (Carr. 505) km 5.4 road.*
- *Repair of Highway 505 (Carr. 505) km 2.5, 3.0, and 4.5.*
- *Addition of asphalt to Highway 505 (Carr. 505).*
- *More light posts on Highway 505 (Carr. 505).*

PRDOH Response: Information regarding infrastructure programs, including: the Critical Infrastructure Resilience Program, FEMA match program and City Revitalization program is outlined in the Action Plan. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

PRDOH will take these comments into consideration as programs are further developed or new programs are developed if additional funding becomes available.

Comment: #140_10-18-18_Carlos Sálamo Domenech

“I’m state bailiff and I’m interested in receiving more information about this program. You can also contact me at my cell phone number:

... or also at my physical address: ...”

PRDOH Response: Currently available information about the CDBG-DR programs can be found in the Action Plan.

Comment: #141_10-18-18_Celinés Vega

“We use this outlet to express our need after Hurricane Maria trusting you can help us. My home is located on Rte 497 Km 3.5 Int del Bo. Pozas de San Sebastian.

Our home suffered severe damage after Hurricane María on September 2017 because of the damage by the flooding from the river next to our house. We currently don’t have a plan to protect our home and make it safer, since we are exposed to flood risk. We live in a cul-de-sac where there are 6 homes. The 6 homes were affected by the flooding. The river is next to our homes and there’s no way of protecting ourselves. I’m attaching a photo taken by a neighbor where you can see part of the homes affected by the flooding.

As heads of family our priority is to have a safe home for our children and currently our home is not safe. We live with the uncertainty of facing another flood. We’re very worried about this situation and we call on this outlet in the hopes you can evaluate our case and visit us to know the danger this river represents for our home and that the CDBG program can help us.

If you need to contact me, you can write me at this email or call these numbers: ... and...”

PRDOH Response: The Home Repair, Reconstruction, or Relocation program is dedicated to serving low- and moderate-income applicants and provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas.

Comment: #142_10-18-18_Edgaro L. Santiago

Summary: On 10/18/2018, Edgaro L. Santiago submitted a letter of suggestions for the CDBG-DR programs outlined in the Action Plan containing recommendations and requests for clarification. To achieve a more resilient Puerto Rico, the letter suggests the following program activities:

- *Housing repairs, construction, and reconstruction should adopt the Building Codes of PR related to Green construction.*
- *Make adjustments to the extremely vulnerable populations to meet the unmet needs properly.*
- *The conversion of streets to Green-Streets are vital in hazard mitigation.*
- *All infrastructure projects should include comply to EPA requirements.*
- *Expand the distribution of funds beyond to include Municipios.*
- *Expand eligible activities within the Community Energy and Water Resilience Installations program to include micro-grid systems.*
- *The CDBG-DR website should allow the beneficiary to know and contact the responsible representatives of each partner agency as outlined in the Action Plan.*

PRDOH Response: Thank you for the comments. PRDOH will take these suggestions into consideration during further development of programs. PRDOH is committed to leading a transparent recovery effort. Information regarding programs, including methods to apply for assistance or check application status, will be posted to www.cdbg-dr.pr.gov when it becomes available.

All projects funded by CDBG-DR must comply with applicable local and federal environmental regulations. As mandated by HUD, 70% of funding under this grant shall be dedicated to benefitting persons of Low- and Moderate- Income (LMI).

Comment: #143_10-18-18_Graciela C. Eleta (Foundation for Puerto Rico)

“Representing Foundation for PR, we wholeheartedly believe in allocating increased dollars to the promotion of PR as a visitor and convention destination.

Key reasons behind our support include:

- *Tourism is a large employer in Puerto Rico. By attracting more visitors, jobs will be created.*
- *Discover Puerto Rico is committed to promoting the entire Island, including Vieques and Culebra. Increased promotion of the entire Island will spread the economic recovery throughout the Island, including communities that need economic assistance.*
- *Recent research confirms that Puerto Rico faces a major perception issue: many people in the U.S. and outside of the U.S. are not aware of the progress made in our tourism industry. However, the research also confirms that people want to visit Puerto Rico when*

we are ready to host them. By increasing promotion, we can update perceptions of Puerto Rico and spur short-term results.

- *It took 8 years for New Orleans' demand to reach pre-Katrina levels. Puerto Rico cannot wait 8 years for full recovery. Advertising tourism now is key to optimizing the recovery process.*
- *Discover Puerto Rico has hired a talented staff, invested in primary research and retained professional services from two award-winning promotional agencies. Likewise, efforts are underway to reposition the brand of Puerto Rico and build an industry leading website. Unfortunately, given the limited promotional resources in the current budget, research confirms that we are under-invested in key markets of opportunity. Discover Puerto Rico can produce positive, incremental results if given the appropriate resources.*
- *Current meeting/convention demand is 68% below pre-Maria pace, but research confirms that planners are interested in return. Now is the ideal time to spur sales activity by investing in targeted sales and promotion tactics designed to reach planners likely to bring business to Puerto Rico.*

While we support a large portion of CDBG- DR funds being allocated to housing and infrastructure, those - in and of themselves- will not be enough to spur the much needed economic development our island needs to restore growth to our island.

In order to restore negative perceptions associated with Hurricane Maria, we need additional funds. These will help position Puerto Rico as the ideal vacation spot for US and international visitors and allow us to reach potential visitors outside of markets we are currently targeting. We look forward to a future where tourism represents 15-20-% of our GDP, making PR a preferred destination for the world."

PRDOH Response: PRDOH agrees that recovery is a multi-faceted effort which encompasses many sectors. These comments have been taken into consideration during final edits of the substantial amendment to the Action Plan prior to submission to HUD.

Comment: #144_10-18-18_Adam Greenfader (AG&T)

Summary: On 10/18/2018, Adam Greenfader, on behalf of AG&T, submitted a letter of suggestions which outlines suggestions towards construction standards, planning programs, the Home Repair, Reconstruction, and Relocation program, and the CDBG-DR Gap to Low Income Housing Tax Credit (LIHTC). To achieve a more resilient Puerto Rico, the proposal suggests the following program activities:

Planning:

- *Perform a comprehensive study of Fair Market Rents and Income Limits.*

Housing:

- *Eradicate illegal construction and provide adequate access to code-compliant construction.*

- Increase the allocation for the Home Repair, Reconstruction, and Relocation Program.
- Increase opportunities for relocation assistance.
- Establish an equity loan program to finance the financing gap in the LIHTC program.

PRDOH Response: Thank you for your comment. These suggestions and recommendations have informed PRDOH during the development Planning Programs, the Home Repair, Reconstruction, and Relocation Program, and the CDBG-DR Gap to Low Income Housing Tax Credit (LIHTC). Currently available information regarding building to code, relocation assistance, and the process for financing the gap funding in LIHTC is outlined in the Action Plan.

Comment: #145_10-18-18_Adam Greenfader (Urban Land Institute)

“On behalf of the Urban Land Institute, I want to express our interest in actively engaging with the Puerto Rico Disaster Recovery Action Plan (docket number FR-6109-N-01). The Urban Land Institute is committed to the responsible use of land and encourages efforts to create lasting impacts that rely on resiliency, coordinated planning and sustainability.

As part of our Southeast Florida & Caribbean District Council, Puerto Rico is an essential part of The Urban Land Institute. In close coordination with the Puerto Rican Builders Association we have been very connected to the recovery efforts in Puerto Rico culminating in an Advisory Services Panel to be held in Puerto Rico in early December funded by our District Council and the Kresge Foundation. While the scope is still being finalized, experts in land use, planning, resiliency and housing will come together for a week to specifically address short, middle and long-term strategies for disaster recovery including creating techniques and implementation programs whereby the municipalities can be responsible recipients of the forthcoming HUD funds.

We remain committed to the recovery efforts in Puerto Rico and are available as a resource to you at any time through our vast membership and world-class staffing resources at both ULI Headquarters in Washington, D.C. and at our District Councils.”

PRDOH Response: Information regarding procurement, including Requests for Proposals (RFP), will be posted to www.cdbg-dr.pr.gov. PRDOH encourages interested parties to monitor the website for opportunities.

Comment: #146_10-18-18_Municipio de Guánica

Summary: On 10/18/2018, Guánica provided an overview of their municipality and the impact of the hurricanes disrupting residents’ lives and their support to achieve economic recovery and those families that were affected to have choices for safe housing that is hygienic, habitable and mitigate against flood zones. The municipio also outlined project proposals for which the following program activities were suggested:

Housing Funding Requested: \$10,000,000.00

Various housing projects are proposed to address the 5545 units of housing that were affected by wind and flooding. Two areas of high priority are Barriada Esperanza and the Belgica community.

These communities have been historically affected by flooding and in the last hurricane only 8 residents were able to be relocated. There are families in flood zones that were not able to be relocated due to insufficient previous funding. For these regions they suggest finding more than one option as intervention since they understand the limited amount of available housing. They suggest 3 alternatives, acquisition of housing units to relocate LMI families, construction of housing units to provide to LMI families, acquisition and rehabilitation of housing units that have been repossessed. These interventions are estimated to be \$10 Million and estimated to be 24 months in duration.

Infrastructure Funding Requested: \$32,500,000.00

Guánica is also proposing projects to mitigate and control flooding with the improvements to their pump system that dates back to the 70's. The effects of the failure of this system to the critical businesses such as medical services locations and day care centers causes negative economic impacts to the municipality and to the commercial areas in the urban center. The principal street called Calle 25 de Julio doesn't have catch basins or a drainage system for runoff. Drainage improvements are proposed in the urban areas with an estimated cost of \$13 million (\$6 million in pumps and \$7 million in drainage improvements) with a 24-month estimated timeframe.

Moving the electric system underground for the 12 streets in the urban center will help improve resilience and help businesses bounce back quicker after hurricanes. Also replace the sanitary and storm sewer system in those 12 streets is proposed. These two projects would be an estimated \$8 million and could be completed in 24 months.

Remodeling the Malecon of Guánica which brings many internal tourists to the area and impacting the local economy will require an investment of \$2.5 million to repave and restore the Fisherman's Wharf.

Restoration of the cultural district in Ensenada for structures such as the Goyito Mejill Coliseum, the flower park and others. This group of projects is an estimated \$5 Million to make these structures a local attraction and contribute to the local economy.

The reconstruction of the coliseum Mariano Tito Rodriguez with an estimated cost of \$4 million with an estimated timeframe of 24 months.

Economic Recovery Funding Requested: \$8,776,100.00

Tourism initiatives to impact 15 communities including Ensenada, Fuig, Arenas and others are estimated to be \$8,776,100.00 and would be 12 months of planning and implementation of the activities.

PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas. Assistance under this program is not geographically restricted in Puerto Rico; residents of Guánica may be eligible to receive assistance

Municipal projects, like those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a

variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Information regarding these programs and the Tourism and Business Marketing program is outlined in the Action Plan. Interested parties should monitor www.cdbg-dr.pr.gov for more information about project eligibility as it becomes available.

Comment: #147_10-18-18_Pedro E. Ramos Rivera (Agrotex Farm Corp.)

Summary:

On 10/18/18, Agrotex Farm Corp. submitted a proposal which provided information on unmet community needs in the Pueblo Nuevo Neighborhood.

Multi-Sector funds requested: \$853,512

- *Decreased crop production due to Hurricanes Irma and Maria.*
- *The damage to the organizational character of the agriculture industry.*

Ponce requests CDBG-DR funding be used to create a commercial development center for various agricultural crops to allow farmers a place to sell their products.

PRDOH Response: The Re-Grow PR Urban-Rural Agriculture program outlined in the Action Plan may provide assistance to urban or rural, large- or small-scale agriculture, livestock or aquaculture installations.

Comment: #148_10-18-18_Municipio of Isabela

Summary: On 10/18/18 The Municipio of Isabela provides an overview of their additional requests for CDBG funding to address the unmet needs.

Housing:

- *Their data for housing affected is a total of 3,809 with 399 homes being completely destroyed and 1774 with major damage and 1636 having been affected or with minor damage. Of those FEMA has determined that 2,826 families need help to address their losses.*
- *The municipio is offering land in the sector La Marina del Bo. Pueblo for which they can construct 9 units of housing to help relocate families. The municipio has also created an inventory of vacant housing units and other abandoned structures which could be acquired, rehabbed and evaluated.*

Infrastructure:

- *Installation of a pluvial sewer system for the Florida Sector to impact 290 families in flood zones*



- *Rehab of existing conditions in Calle Cofre in Bo. Jobos and Calle Puerto as well as Streets 1 and 4 in Bo. Arenales Bajos to address the need of improvements to the runoff sewer systems and runoff to be directed adequately.*
- *Construction of gabion walls in various stretches of Carr 4466 and elevation of the bridge to avoid inundations to keep access for at least local residents -100 families – and to maintain local tourism.*
- *Improvements in elevation to bridge Quebrada los Cedros on Carr 4466.*
- *Reconstruction of Carr. 4466 2.5km adjacent to Aguadilla which currently has only 1 lane functioning due to the construction of the gabion walls. Fortifying this wall will be a resilient measure to ensure the safety of 250 families in Isabela and many others in Aguadilla, as well.*
- *Reconstruction of Puente Carr 459 in Bo. Jobos.*
- *Carr. 466 in the interior sector to Villa Pesquera Bo. Guaynabo.*
- *Needed improvements to lighting structures, service vehicles, traffic signals, security cameras and antenna damages to municipal police.*

Economic Recovery:

- *Targeted recovery for the Agricultural sector and the affected the production of raw materials and job security for those in those industries.*

PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas. Assistance under this program is not geographically restricted in Puerto Rico; residents of Isabela may be eligible to receive assistance.

Municipal projects, like those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

The Re-Grow PR Urban-Rural Agriculture program outlined in the Action Plan may provide assistance to urban or rural, large- or small-scale agriculture, livestock or aquaculture installations. Further definition regarding program application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines.

Comment: #149_10-18-18_Thomas R. Roth (Roth Advisory LLC)

“On behalf of the Urban Land Institute, I want to express our interest in actively engaging with the Puerto Rico Disaster Recovery Action Plan (docket number FR-6109-N-01). The Urban Land

Institute is committed to the responsible use of land and encourages efforts to create lasting impacts that rely on resiliency, coordinated planning and sustainability.

As part of our Southeast Florida & Caribbean District Council, Puerto Rico is an essential part of The Urban Land Institute. In close coordination with the Puerto Rican Builders Association we have been very connected to the recovery efforts in Puerto Rico culminating in an Advisory Services Panel to be held in Puerto Rico in early December funded by our District Council and the Kresge Foundation. While the scope is still being finalized, experts in land use, planning, resiliency and housing will come together for a week to specifically address short, middle and long-term strategies for disaster recovery including creating techniques and implementation programs whereby the municipalities can be responsible recipients of the forthcoming HUD funds.

We remain committed to the recovery efforts in Puerto Rico and are available as a resource to you at any time through our vast membership and world-class staffing resources at both ULI Headquarters in Washington, D.C. and at our District Councils.”

PRDOH Response: Information regarding procurement, including Requests for Proposals (RFP), will be posted to www.cdbg-dr.pr.gov. PRDOH encourages interested parties to monitor the website for opportunities.

Comment: #150_10-18-18_Reinaly Quintana (Rv General Contractor)

“On Wednesday, October 17, 2018 you presented a Public Hearing in Moca, and we were present. We’re interested in applying for the Construction and Commercial Revolving Loans Program. If you are so kind, please send us the necessary documents to apply for this program. I currently have the presentation published on www.cdbg-dr.pr.gov. However, I’m missing the documents to apply.

If they are not ready, which ones can the Company begin preparing (accounting docs. Confirmation affidavit, among others)”

PRDOH Response: Information currently available regarding the Construction and Commercial Revolving Loan program is available in the Action Plan.

Comment: #151_10-18-2018_José L. Velázquez Padilla (Urb. Luchetti)

Summary: On 10/18/2018, José L. Velázquez Padilla, on behalf of Urb. Luchetti, submitted a whitepaper including information on the demographics of the Luchetti community and 22 questions or doubts associated with a home owner without any mortgage debt. Questions are related to relocation, acquisition of new housing, and many more housing situations.

PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas. The Mortgage Catch-up program, and the Homebuyer Assistance Program provide assistance to protect homeowners at risk of foreclosure and funding for down payments and/or closing costs for purchase of a new home, respectively.

Assistance under these and other housing programs is not geographically restricted in Puerto Rico; residents of the Luchetti Urbanization may be eligible to receive assistance. Currently available information regarding award caps, eligibility criteria, and rehabilitation opportunities is outlined in the Action Plan.

Comment: #152_10-18-18_Municipio de Mayagüez

Summary: On 10/18/18, Mayagüez submitted project proposals to provide directly affordable housing, sustainable economic development, complete public transportation, construct more resilient infrastructure and economically impact the industries and businesses in the western part of PR.

Planning Funding Requested: \$520,000.00

- *The urban center by planning measures to address new housing, rehabilitation of structures, development of microenterprises, promote tourist activity, promote the commercial sector, improvement of emergency management and public services.*
- *The coastal plan for reduction of concentration of residents in flood zones, commercial development, educational initiatives and others.*
- *Eco Alameda plan for protection of green spaces and usage of green spaces for water retention.*
- *Plan the port for their capacity to mobilize supplies, reduction of coastal erosion, promote micro enterprise communities and other measures.*
- *These planning measure will require taking inventory and studies to make key decisions on which interventions would be best for land use, mitigation and development.*

Infrastructure Funding Requested: \$706,800,000.00

- *Their crucial infrastructure resilience program proposed to address multiple areas such as landfills, health systems, development, expansion and rehab of streets and multiple mitigation projects such as coastal resilience and improvements to Canalization of Rio Yaguez. This group of projects are estimated to require an investment of \$362.5 million in funding.*
- *Another proposed program is to repurpose and modernize infrastructure that is not being used by the department of education as community resilience centers such as the Manuel Fernandez Juncos school. This project is an estimated \$7.8 Million.*
- *The revitalization of the city program includes various projects such as acquisition of structures, reforestation, LED technology for lighting fixtures, structural improvements to plazas, recreational green spaces etc. These groups of projects are an estimated \$136.5 million.*
- *Puerto Rico by Design is another program estimated to cost \$200 million and includes development of opportunity zones such as the local airport Eugenio Maria de Hostos and the Port of Mayagüez and public transport interventions.*

Housing Funding Requested: \$117,100,000.00

- Various housing projects are proposed such as Senior independent living in Hostos or in Ponce de Leon, relocation project for residents in La Via sector to Villa Pacifica. Others such as Plaza Munoz or Hogar la Española will address the needs for housing for homeless populations. These group of projects are estimated to be \$117.1 million.

Economic Recovery Funding Requested: \$40,300,000.00

- Mayagüez is proposing an incubator and accelerators program for small businesses which will include several areas such as Villa Pesquera – Sector El Docky, promotion of enterprises, the Acquisition environmental mitigation, rehab, and equipment for the marina industrial building and the new industrial building as well as the elaboration and implementation of the city strategic development plan. These groups of projects are estimated to be \$32.6 million.
- Their program to renew Agricultural Urban and Rural development is approximately \$7.7 million to address the Villa Pesquera, the acquisition and development of the Yaguez diving and fishing club, the boating dock in Bo El Seco and improvements in the Mani Fishery.

PRDOH Response: Municipal projects, like some of those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

The Social Interest Housing Program aims to provide dignified, resilient housing for vulnerable populations, including the elderly. The Small Business Incubator program provides new and small business with the support needed to grow. The Re-Grow PR Urban-Rural Agriculture program outlined in the Action Plan is a food security initiative which may provide assistance to urban or rural, large- or small-scale agriculture, livestock or aquaculture installations. These programs are not geographically restricted in Puerto Rico; residents of Mayagüez may be eligible to receive assistance.

Comment: #153_10-18-18_Ponce Research Institute

Summary: On 10/18/18, Ponce Research Institute requested funding by proposing a project to increase the opportunities for specialized doctors to serve residents on the island.

Infrastructure Funding Requested: \$20,000,000.00

The research institute proposes the use of telematics to increase the types of medical services by connecting rural communities to accessibility to over 500 professional and specialized doctors. Of priority connecting the 80 hospitals of PR and 25 primary centers CDT's and outpatient clinics.

The program would include training for everyone from medicine students to practicing professionals attain the required to get licensed in the practice of Telemedicine. This would complement existing services by doctors and help provide real time consultations that will be built

with a billable code, thus increasing services and revenue within the medical field. Law 168 approved on August 1, 2018 for the use of telemedicine was the first step to building systems of health that are resilient and provide services needed in rural areas. The proposed project is an estimated \$20 million.

PRDOH Response: Large transformative projects which create jobs and/or cascading economic impacts may be eligible for funding under the Economic Investment Portfolio for Growth program. Currently available information regarding this program is available in the Action Plan.

Comment: #154_10-18-18_AI Rizek

“Summary: On 10/18/2018, AI Rizek submitted a letter of commentary which outlines suggestions towards construction standards, planning programs, the Home Repair, Reconstruction, and Relocation program, and the LIHTC program. To achieve a more resilient Puerto Rico, the proposal suggests the following program activities:

Planning:

- *Perform a comprehensive study of Fair Market Rents and Income Limits.*
- *Perform studies of asbestos and lead before doing repairs or construction.*

Housing:

- *Ensure construction costs due to the 2018 building code established in Puerto Rico are considered in the award caps.*
- *PRDOH must work jointly with municipios to address relocation assistance accurately and properly.*
- *Clarify the definition of a Multi-Family property.*
- *Clarify and specify how PRDOH will focus on the needs of the most vulnerable populations on the island.*
- *Acquire housing developments to devote to temporary housing assistance.*
- *The Home Repair, Reconstruction, and Relocation Program should include energy and water resilience measures.*
- *Align the Community Energy and Water Resilience Installations program with the Home Repair, Reconstruction, and Relocation Program to achieve efficiency and avoid the duplication of benefits.*
- *Increase the award cap for the installation of energy resilience features under the Community Energy and Water Resilience Installations program.*
- *Expand the assistance under the Homebuyer Assistance Program to include debt payments and credit assistance.*

Economic Development:

- *Expand the list of eligible entities for the Construction and Commercial Revolving Loan Program to include housing developers.*

Infrastructure:

- *Eligible entities for the Community Resilience Center Program should include for-profit entities.*

PRDOH Response: Thank you for the comment. PRDOH will take these suggestions into consideration during further development of programs or in development of additional programs if additional funding becomes available. PRDOH is committed to leading a collaborative, transparent recovery. As mandated by HUD, 70% of the CDBG-DR grant will be dedicated to benefitting Low- and Moderate- Income persons. All construction under CDBG-DR programs must comply with applicable local and federal building codes and environmental regulations.

Comment: #155_10-18-18_Municipio de Rincón

Summary: On 10/18/18 Rincón provided an overview of the impact which included 948 housing units of which 88 were completely destroyed, 484 lost their roofs and 376 require rehabilitation and requested funding on the basis of the following projects:

Housing

- *In the Rio Grande Barrio, 105 units are being proposed to use the proposed \$50,000 and \$25,000 vouchers.*
- *Relook at the property titles for the “cerro de los pobres” in our urban center and whose land was given to the municipality to achieve the grant of ownership.*

Infrastructure:

Rincón cites a list of infrastructure projects that includes:

- *Reconstruction of the retaining wall in Bo. Barrero by the beach.*
- *Reconstruction of highways PR-411, PR-429, PR-412, the La Piramide Sector, PR-412 Los Rosados Sector.*
- *Rehabilitation of pluvial infrastructure in the community Stella del Bo. Pueblo.*
- *Various drainage improvements.*
- *Removal of debris and beach nourishment is also proposed.*

Economic Recovery Funding Requested: \$3,200,000.00

- *Completion of construction of a municipal hotel which was stopped in March of 2017 due to the lack of liquidity from the Banco Gubernamental de Fomento.*

PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for

voluntary relocation out of hazard-prone areas. None of the housing programs outlined in the Action Plan are geographically restricted in Puerto Rico, residents of Rincón may be eligible for assistance.

Municipal projects, like some of those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #156_10-18-18_Dr. Olga Rodríguez de Arzola (Centros Médicos Académicos Regionales de Puerto Rico del Sur Oeste) (CMARS)

Summary: On 10/18/2018, Centros Médicos Académicos Regionales de Puerto Rico del Sur Oeste submitted a project proposal and fund request to implement medical education practices under the Workforce Training Program. Centros Médicos Académicos Regionales de Puerto Rico del Sur Oeste (CMARS) provides services for the development in teaching, clinical epidemiological and sociomedical research, offers health services and other purposes. It's an integration platform supporting the instruction of 554 faculty of distinct specialties and distributed across 91 hospital and clinics in all the island. The Association of American Medical Colleges AAMC reported the lack of 90,000 doctors in 2020. This coupled with the increased mortality in Puerto Rico after the hurricane by 62% according to the Harvard study and the reduction of the supply and increasing demand for physicians for an aging population.

Economic Recovery Funding Requested: \$120,000,000.00

This project proposes to create 50 programs for medical education with an estimated cost of \$120 million.

It is suggested these programs will provide 150 additional jobs for doctors per year and 3 jobs for support personnel. Medical residencies will generate employment of faculty and support staff, 5 being physicians and 1 support staff for each of the residency programs and 3 subspecialists for each fellowship.

The training will contribute to the local needs of workforce training for medical professionals here in the island and provide additional benefits to the medical field and overall provision of public health services here in PR.

PRDOH Response: Large transformative projects which create jobs and/or cascading economic impacts may be eligible for funding under the Economic Investment Portfolio for Growth program. Currently available information regarding this program is available in the Action Plan.

Comment: #157_10-18-18_Municipio de Sabana Grande

Summary: On 10/18/18 Sabana Grande provides an overview of their additional requests for CDBG funding to address the unmet needs.

Housing Funding Requested:

- *Auxiliary homes for public service would offer housing to elderly, LMI, homeless, and have difficulty accessing services. The program would be \$4,384,642.67 which includes the salaries of 200 assistants and a supervisor providing services, contribution to SS and FSE for 389 days of work.*

Infrastructure Funding Requested:

- *A commercial and residential complex in the facilities of Antigua Guardia Nacional in Sabana Grande with an estimated cost of \$3,005,000.00 which would generate 40 jobs and 4 permanent for operational needs post construction.*
- *An extension to the recreational area in PR 364 for 3.5km which would also be part of their economic development request. This project is estimated to be \$600,000 and would create 20 jobs during construction and 5 permanent jobs for operations after construction. This project will be accessible to disadvantaged communities. This recreational area currently provides \$178,354.50 in income and is important to the municipio.*
- *Improvements and expansion of Hospital Bernice Guerra Facilities is estimated to cost \$7 million The improvements would provide multiple benefits to the emergency area, the pediatric unit and be the home for the center aid dispatcher.*
- *The Sports and cultural Complex would be a \$7 million-dollar project that can provide parking, loading zone and utilize for generating revenue. It would account for 304 jobs indirectly and 20 permanent jobs for the administration and maintenance.*

PRDOH Response: The Social Interest Housing program aims to provide dignified, resilient housing for vulnerable populations, including those facing homelessness and the elderly. This program is not geographically restricted in Puerto Rico, residents of Sabana Grande may be eligible for assistance.

Municipal projects, like some of those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #158_10-18-18_Municipio de Toa Baja

Summary: On 10/18/18 Toa Baja submitted an overview of 10,073 owners and 3,432 tenants suffered moderate to severe damages according to FEMA data. They also speak about their historical experience with CDBG funds previously, for over 40 years and their ability to be subrecipients for the management of the CDBG DR funds.

Housing:

- *They cite their programs to address the rehabilitation of abandoned homes, new resilient residences being constructed and closing costs and mortgages program.*

Infrastructure:

- *Toa Baja cites the importance of the management and maintenance of rainwater as part of the preventive solution for flooding. However, they cite the challenges in addressing these preventive measures as the municipality is assigned the responsibility of maintenance but is not provided the funding, equipment or technical assistance or plans or direction of the pipes for these systems which are over 50 years old. The inability of this old infrastructure to maintain water flow out of the area contributed significantly to the flooding experienced during Maria.*
- *They cite their programs to address schools and community refuge centers previously provided in March 2018.*

Economic Recovery:

- *Toa Baja wants to reutilize agricultural areas as part of the agricultural renewal program in PR.*
- *They also speak about the importance of citizen participation and the creation of the “Cooperative municipal institutes and citizen participation” to empower their communities to provide feedback on multisector projects and other projects for the development and transformation of the community.*

PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas. The Re-Grow PR Urban-Rural Agriculture program outlined in the Action Plan is a food security initiative which may provide assistance to urban or rural, large- or small-scale agriculture, livestock or aquaculture installations. These programs are not geographically restricted in Puerto Rico, residents of Toa Baja may be eligible for assistance.

Municipal projects, like some of those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #159_10-18-18_Ponce Health Sciences University School of Medicine

Summary: On 10/18/18, Ponce Health Sciences University School of Medicine submitted a project proposal and fund request to meet a need for specialized doctors to service residents on the island and the need to increase the pipeline of specialized doctors who stay on the island. 15 million in hurricane losses.

Infrastructure Funding Request: \$42,000,000.00

The school of medicine proposes the creation of an academic center with various phases and outpatient clinics to expand the training of residencies for doctors with expanded infrastructure.

They cite this project meeting a national objective, being eligible and contributing to economic development as well.

Economic Recovery:

Their project would impact creation of jobs of which 1,101 would be in academia, 484 indirect jobs created, and 65% of these jobs for low income candidates. They would also be training professionals and produce approximately 73.8 million in economic output.

PRDOH Response: Large transformative projects which create jobs and/or cascading economic impacts may be eligible for funding under the Economic Investment Portfolio for Growth program. Currently available information regarding this program is available in the Action Plan. Further information will be included in the program guidelines, which will be posted to www.cdbg-dr.pr.gov, when it becomes available.

Comment: #160_10-19-18_BamBam Graphics Design

"I only want written information about the plan presented by the Governor to help the Police Officers with grants for homes, when will it begin or what's the process if you have to register or start gathering any documents. I don't know if you can help me with this information."

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home. Information about the program can be found in the Action Plan. Thank you for your comment. PRDOH will consider it in further development of the programs outlined in the Action Plan.

Comment: #161_10-18-18_Municipio de Villalba

Summary: On 10/18/18, The Municipio de Villalba outlined the following proposed projects and requests for funding.

Infrastructure:

- *Micro Energy Network using the hydroelectric Toro Negro to generate an estimated 130 MV. This project would make Villalba, Orocovis, Morovis and Ciales energy partners and positively impact thousands of residents in all those municipios and impact economic development as well. The planning phase is estimated to be \$2 million and the design and build would be \$227 million finishing in 2020.*
- *Canalization of Rio Jacaguas due to the multiple sources of water flow and the destruction caused by flooding of 3-4 feet in residences. This project would be an estimated \$20 million.*
- *They are proposing building a new emergency center of operations in the land located by the Gregorio Duran detour. The project would cost \$5 million and they cited the numerous benefits to this project.*

- *Completion of phase 2 for the Detour Gregorio Duran with an estimated \$25,000,000.00 cost.*
- *Construction of a cemetery for \$500,000.00, and the pavement of streets and municipal roads with an estimated cost of \$5 million.*

Housing:

- *Villalba requests funding for the construction of new housing to address the need for 188 apartments to relocate families in Palmarejo, Apeadero, Sierrita, Cubones, Tolloosa and others. These projects have approved plans and the necessary permits to be shovel ready. The estimated cost would be an estimated \$15.9 million.*
- *Additional housing projects include the revitalization of 100 housing units in different areas within the municipio with a total cost of \$2.5 million.*
- *Villalba Elderly would affect 100 units of housing for elderly and be an estimated \$7.5 million on municipal land.*

PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas. The Social Interest Housing program aims to provide dignified, resilient housing for vulnerable populations, which may include the elderly. These programs are not geographically restricted in Puerto Rico, residents of Villalba may be eligible for assistance.

Municipal projects, like some of those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #162_10-19-18_ Dalila Lugo-Pérez

“Hello when does the assistance to buy a house begin? When and where can one apply?”

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home. Information about the program can be found in the Action Plan.

Comment: #163_10-19-18_ Kathy Díaz Ortega

“I’m waiting to build but I don’t see anything about home repairs in San Juan. Could you tell me what we need to do or are you still not in San Juan? I lost everything, I’m an obese person, I have psoriasis, I have thyroid problems, I suffer from high blood pressure, I have herniated discs. I need your help. Please tell me what I have to do.”

PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for

voluntary relocation out of hazard-prone areas. Information about the program can be found in the Action Plan.

Comment: #164_10-19-18_Gisselle Córdova Ibáñez (Organización Puertorriqueña de la Mujer Trabajadora)

Summary: On 10/19/2018, OPMT submitted a letter of commentary which outlines suggestions towards the implementation of CDBG-DR programs in regard to the prioritization and equal access of Puerto Rican females. To achieve a more resilient Puerto Rico, the proposal suggests the following program activities:

Planning:

- *Incorporate the participation of non-profit organizations and non-governmental agencies that defend the interests of women in any planning procedures.*

Housing:

- *Allocate the funds primarily to those who lack an adequate, safe, and secure home.*

Economic Recovery:

- *Address the conditions of the thousands of females living in poverty.*
- *Expand workforce development to include training for women to enter the labor market.*

PRDOH Response: Thank you for your comment. Non-profit organizations, including those who advocate for women, are eligible to participate in the Whole Community Resilience Planning program. As mandated by HUD, 70% of funding expended under the CDBG-DR grant shall be used to benefit low- and moderate- income persons. Women are encouraged to participate in the Workforce Training Program.

Comment: #165_10-19-18_Soledad Gaztambide-Arandes (Para la Naturaleza)

Summary: On 10/19/2018, Para la Naturaleza submitted a letter of commentary which outlines the effect of Hurricanes Irma and Maria to nature and the environment and proposes actions where Para la Naturaleza is willing and interested in collaborating with PRDOH. To achieve a more resilient Puerto Rico, the proposal suggests the following program activities:

Planning:

- *Utilize Para la Naturaleza as a sub-recipient to receive expertise advise on using natural and green solutions throughout the Whole Community Resilience Planning program.*

Economic Recovery:

- *Utilize Para la Naturaleza as a sub-recipient through the provision of nature ecotourism, and reforestation projects.*
- *Support best practices for agricultural sustainability.*

- *Incorporate community hubs and a commercial to highlight distinct city centers.*
- *Suggested changes to the text in the City Revitalization program.*

Housing:

- *Incorporate Green Building Measures*

Infrastructure:

- *Incorporate solutions based on nature as part of all resilience measures.*
- *Consider the well-being of children.*
- *Commercial and public infrastructure reconstruction must comply with the Light Pollution Laws of 2018.*
- *Analyze the cost-benefit of existing and proposed projects versus an alternative natural infrastructure implementation.*

PRDOH Response: Thank you for your comments. Non-profit organizations are encouraged to participate in the Whole Community Resilience Planning program. PRDOH will utilize green building standards to the extent feasible, as outlined in the Action Plan. All construction funded by CDBG-DR must comply with applicable local and federal environmental regulations.

Comment: #166_10-19-18_Jessie M Guerrero Cardona (Ponce Neighborhood Housing Services Inc.)

Summary: On 10/19/2018, Ponce Neighborhood Housing Services submitted a letter of commentary which outlines the following suggestions to the Mortgage Catch-up Program, Homebuyer Assistance Program, the Housing Counseling Program, and the Home Repair, Reconstruction or Relocation Program.

Mortgage Catch-up Program:

- *This program should provide assistance to the principal amount of the mortgage.*
- *Allocate funds to certified agencies such as CDFI, NGOs and OCIF so that they can offer low interest loans to their clients*

Homebuyer Assistance Program:

- *Offer one-on-one housing counseling assistance to participants in the homebuyer assistance program.*
- *The allotted time span of matching one's savings should be reduced to 10-24 months instead of 3 years.*
- *The program should establish a fixed specific amount of saving deposits in order to receive a match from CDBG-DR funding.*



- *Expand eligible recipients of this program to include all “first response” employees including firefighters, medical emergency personnel, emergency management personnel, and non-profit employees related to first response.*

Home Repair, Reconstruction or Relocation Program:

- *Inventories of abandoned and rehabilitated homes should be offered at an affordable price to Non-Profits.*

Housing Counseling Program:

- *Housing Counseling Agencies must offer a wide range of services and Housing Program participants should be required to participate in corresponding services.*
- *The distribution of funds allocated to NPOs and Housing Counseling Agencies must be organized by regions, equally and without competition.*

PRDOH Response: Thank you for your comments. PRDOH will consider these suggestions and recommendations during further development of the Homebuyer Assistance Program and Mortgage Catch-Up program. Individuals participating in the Homebuyer Assistance program will receive housing counseling services to educate to prepare prospective homebuyers and to inform them of the responsibilities of being a homeowner.

Comment: #167_10-19-18_Nilmarie Amill (Ponce Neighborhood Housing Services Inc.)

“I’m submitting comments for the following programs:

Mortgage Catch-Up – Every case should be evaluated specifically and individual education and counseling should be mandatory about finance and budget management by a HUD-approved Housing Counseling agency. It’s important to assess if the participants will be able to continue making mortgage payments ON TIME and IN FULL.

If that is not the case, other options should be evaluated: FHA loans, the funds can be used to make an “FHA Partial Claim” that would adjust the monthly payment.

Housing Counseling Program – Assistance that is VITAL to get positive long-term results. It goes HAND IN HAND with ALL the housing programs. Making educated and informed decisions in everything regarding housing and personal finances in the family nucleus.

Homebuyer Assistance Program – This Program is VERY IMPORTANT since it teaches participants the importance of SAVING, as well as provides them the necessary help to be able to buy their first home. It establishes solid financial bases, which have been beneficial to the conservation and preservation of long-term housing.

Set up a time limit from 10 months to a maximum of 24 months to be able to focus in saving in the shorter term, while educating and preparing the client regarding credit and mortgage loan qualification, with a housing counseling agency.”

PRDOH Response: Thank you for your comments. Further information regarding the Mortgage Catch-Up program will be published to www.cdbg-dr.pr.gov after the program is

approved by HUD. PRDOH will consider these comments as the Mortgage Catch-Up and Housing Counseling programs are further developed.

Comment: #168_10-19-18_Ernesto Valle

Summary: On 10/16/2018, Divina Misericordia Developer LLC submitted a proposal which outlines use of recovery funds develop rental units for elderly persons in Bayamón. To achieve a more resilient Puerto Rico, the proposal suggests the following program activities:

Housing funds requested: \$17,800,000

- *The project proposes to address elderly populations with a housing project in a 12-floor structure built on 8,401 square meters space located on the Vista Alegre Development in Bayamon.*
- *This project also has \$7,000,000.00 from sales of below 4% federal tax credit bonds.*
- *They are requesting \$17,800.00 in CDBG DR funds.*

PRDOH Response: Projects which qualify for Low Income Housing Tax Credits may be eligible for assistance under the CDBG-DR Gap to Low Income Housing Tax Credit (LIHTC) program, outlined in the Action Plan. The Social Interest Housing program aims to provide dignified, resilient housing for vulnerable populations, which include the elderly. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #169_10-19-18_Ernesto Valle

Summary: The Egida de la Divina Misericordia proposes to address elderly populations with an existing housing project with G8 Developer LLC which will relocate elderly vulnerable populations out of the flood zone

Housing funds requested: \$17,800,000

- *The project proposes to address elderly populations with a housing project in a 12-floor structure with a total of 110 units built on 4,544.33 square meters space located on in San Juan.*
- *This project also has \$7,000,000.00 from sales of below 4% federal tax credit bonds.*
- *They are requesting \$17,800.00 in CDBG DR funds.*

PRDOH Response: Projects which qualify for Low Income Housing Tax Credits may be eligible for assistance under the CDBG-DR Gap to Low Income Housing Tax Credit (LIHTC) program, outlined in the Action Plan. The Social Interest Housing program aims to provide dignified, resilient housing for vulnerable populations, which include the elderly. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #170_10-19-18_María Alexandra Maurás (Municipio de Coamo)

Summary: On 10/19/2018, the Municipality of Coamo submitted a proposal which provided information on unmet needs. The proposal also included suggested activities to be funded under the CDBG-DR grant.

Coamo requests CDBG-DR funding be used to complete the following projects. A brief description of project plans, project budget, and project locations associated with each activity is outlined in the proposal.

Housing funds requested: \$21,694,326

- *Rehabilitation of Villas de Coamo*
- *Rehabilitation of San Antonio Residences*
- *Construct accessible new housing units.*
- *Create mixed use properties to be used for commercial and residential purposes.*
- *Create Assisted Living and Shelter units.*

Economic Recovery funds requested: \$4,667,708.00

- *Rehabilitate spaces to establish business and attract tourists.*
- *Addition of two halls to the Hollywood theater.*

PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas. The Social Interest Housing program aims to provide dignified, resilient housing for vulnerable populations, which may include the elderly. These programs are not geographically restricted in Puerto Rico, residents of Coamo may be eligible for assistance.

Large transformative projects which create jobs and/or cascading economic impacts may be eligible for funding under the Economic Investment Portfolio for Growth program. Currently available information regarding this program is available in the Action Plan.

Comment: #171_10-19-18_José A. Miranda Miranda

“My comment is regarding the activities in the plan regarding prevention and actions before a catastrophic event. In our case in particular, providing assistance to elderly people and people with disabilities who live in nursing homes or federally-funded housing projects.

In my case, I’m talking as administrator to 2 projects for the people mentioned above. Our comment is intended to request you to consider the possibility of awarding funds to these federally-funded housing projects, which are private and assist hundreds of low-income people. The funds to be awarded would greatly help these projects that usually have a very limited budget and it’s almost impossible to add facilities or services that would be beneficial to their residents.

As an example, the housing projects that usually have an emergency generator only cover some common areas. It would be ideal to have a generator to power all the units, facilitating its residents, among other benefits, to prepare their own food and warrant their safety. The problem is that a new generator to cover this service could cost over \$350,000, which the projects don't have, and HUD can't assign either. Other possible improvements to these projects are installation of security windows and doors, installation of new higher capacity diesel tanks for generators, among other improvement projects.

To this effect, we ask that you consider the possibility of assigning federally-funded multi-family housing projects, which are the ones that provide housing to the most vulnerable populations in need in our country. For this we suggest the mayors of each municipality include the needs of these projects in their needs plan."

PRDOH Response: Currently available information about the Multi-family Reconstruction, Repair and Resilience Program can be found in the Action Plan.

Comment: #172_10-19-18_José R. Rondón Diepa

"I'm the president of the Barrio Camarones de Guaynabo Special Community. I'm requesting very respectfully that the Secretary include sanitary sewer projects for all the homes and businesses in the neighborhood. Currently the septic tanks, besides contaminating underground water, and not even counting the non-authorized discharges that happen there, are a risk for soil collapse in case of earthquake. I'm also requesting our properties to have a title and to appear in the appropriate Property Register. Finally, we request a resilient community center that can be placed on any of the several empty properties. These projects appear as necessary and valid since the year 2005 as part of the Special Communities program and after the hurricane, they are more urgent for the wellbeing of the community. The total for these projects as estimated for updating is approximately \$2 million. I hope you consider this request favorably and tell me the results."

PRDOH Response: Municipal projects, like those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors. Currently available information about the Community Resilience Centers which outlines the incorporation of retro-fitted or constructed resilience centers can be found in the Action Plan. The Title Clearance program aims to resolve title issues for homeowners who lack clear title.

Comment: #173_10-19-18_Belkis Díaz

"I would like a part of those funds to be used as an incentive for young people to invest in real estate. There are young people that are capable of moving the economy of the real estate market, but we don't have the funds to start buying houses that are a nuisance to the community because of their poor maintenance and getting them in the right conditions for the people who need them at an affordable price. It would be a way of helping with the housing problem while moving the economy. Here are the options I suggest.

1. Lend 100% to invest in real estate.
2. Provide training to young people.
3. Provide real estate training to people who are interested.
4. Training in collaboration with economic development, and economic development to lend 100% of the investment.”

PRDOH Response: The Homebuyer Assistance program, outlined in the Action Plan, provides assistance with down payments and/or closing costs associated with the purchase of home. Young people are encouraged to participate in this program. Program guidelines, policies, and start dates will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

Comment: #174_10-19-18_David Ortíz

“My idea for the use of federal funds for housing in Puerto Rico consists of being able to use Puerto Rico housing funds for the down payment of a first home, which also can be used for the closing costs, to be for and buy appliances for this first home”.

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home. Information about the program can be found in the Action Plan.

Comment: #175_10-19-18_David Ortíz

“My idea for the use of federal funds in Puerto Rico, is that they should be used to buy a first home or to buy a piece of land where to build the first home”.

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home. Information about the program can be found in the Action Plan.

Comment: #176_10-19-18_David Ortíz

“My idea about the use of federal funds to buy a house in Puerto Rico, is for it to be for a maximum of \$50,000 to \$100,000.”

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home. Currently available information regarding this program, including award caps, can be found in the Action Plan.

Comment: #177_10-19-18_David Ortíz



“My idea for the use of federal funds for Puerto Rico is that the purchase of the house be either in a town’s central area as well as the rural area of each town.”

PRDOH Response: Participation in the Homebuyer Assistance Program is not restricted by geographical location. Currently available information about the program can be found in the Action Plan.

Comment: #178_10-19-18_David Ortíz

“My idea for the use of federal funds in Puerto Rico for the use of buying a home, is for them to be combined with other federal aid. Not only use one type of assistance, if possible and if the person qualifies that they can use more than one type of help.”

PRDOH Response: Participation in the Homebuyer Assistance Program does not preclude you from participation in another program. Currently available information about the program can be found in the Action Plan.

Comment: #179_10-19-18_Marta Casablanca

“I have something to contribute to this project. I would like with that money to be able to pay existing mortgages and re-mortgage with lower interests”.

PRDOH Response: The Mortgage Catch-Up program provides assistance for homeowners to pay delinquent mortgage balances. The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home.

Comment: #180_10-19-18_Marta Casablanca

“My idea for the use of that money is to buy houses in new projects, also to buy houses that the banks haven’t been able to sell or mortgage”.

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home.

Comment: #181_10-19-18_Myrna Ramos

“I hope to be able to fix the roof of the bedrooms because the wood is sagging”.

PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas.

Comment: #182_10-19-18_Kathy Díaz Ortega

"I'm waiting to apply for assistance to rebuild my home."

PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas.

Comment: #183_10-19-18_Wanda Luquis

"I would like to give priority to a decent house to elderly people because they were one of the sectors more impacted during Hurricane María. Many are alone and unprotected by their families. Many don't understand the claims process for assistance, like FEMA. The other sector is single mothers that alone and on their own, make their children move forward. I would also like to see the construction of pet sanctuaries in key places in the Island to be sheltered. The reconstruction and repopulation of urban centers is key to help lift the economy in the municipalities."

PRDOH Response: The Home Repair, Reconstruction, or Relocation program prioritizes elderly applicant and provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas. Further definition regarding application periods, documentation and process used to determine eligibility will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

PRDOH will take these comments into consideration during further development of programs or during development of new programs if additional funding becomes available.

Comment: #184_10-19-18_Damaris Matos

"I wanted to know more information about the assistance honorable Ricardo Rosselló reported to buy a home or an existing home. I understand it was for teachers, police officers and others. I wanted to know where I have to go or call to apply for it and know the requirements."

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home. Information about the program can be found in the Action Plan.

Comment: #185_10-19-18_Lizette García Quiñones

"This is to inform you that I have a house that was impacted by Hurricane María. I would like you to call me at... to provide you more information. I hope to receive your assistance."

PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas.

Comment: #186_10-19-18_María Cortés Dávila

Summary: On 10/19/2018, María Cortés Dávila submitted a letter of commentary which outlines suggestions and requests for clarification to community participation, Housing programs, Title Clearance Program, Community Resilience Centers, Workforce Development Training, and the Community Energy and Water Resilience Installations. The following is an outline of the commentary:

Unmet needs:

- *Channeling of the La Plata River.*
- *Infrastructure improvements.*
- *Ownership.*
- *Street signage.*
- *Community center to have a space to hold workshops and community meetings.*
- *Economic development.*
- *Address the problem of abandoned houses within the community.*

Suggestions:

- *Improve community participation.*
- *Reduce abandoned housing.*
- *Improve proof of ownership through homeowner title assistance.*
- *Use abandoned structure as community centers.*
- *Use solar energy throughout the island.*

PRDOH Response: These suggestions and recommendations have informed PRDOH during the process of community engagement, the development of the Title Clearance Program, Community Resilience Centers, the Workforce Training program, Community Energy and Water Resilience Installations Program, Economic Recovery Programs, and Infrastructure Programs. Currently available information regarding these programs is outlined in the Action Plan.

Comment: #187_10-19-18_Marisol Ortíz

“I want to ask what the requirements are for the new program that was recently advertised in the press for the mortgage payment assistance.”

PRDOH Response: The Mortgage Catch-up Program, outlined in the Action Plan, provides mortgage payment assistance to homeowners at risk of foreclosure.

Comment: #188_10-19-18_Paola Santiago Toledo

“PUBLIC COMMENT STATEMENT FOR CDBG-DR ADMENDMENT:

In order for PR to become a self – sufficient economically empowered holistic community; it must take full advantage of the devastation caused by recent hurricanes Maria and Irma unlike previous disasters such as Hurricane Katrina.

In particular, Hurricane Maria’s impacts has seen the longest sustained subsistence of food and water of any previous disaster. This devastation has brought an enormous opportunity to help PR recover, reconstruct, and become more resilient to future man-made and natural disasters. This opportunity must include some of the following CDBG-DR leveraging components and projects:

A sustainable financial leveraging concept that addresses any and all unmet damage, mitigation, and pre-storm needs and issues, yet maximizes Program Income and the Commonwealth’s implementation capacity for accountability and integrity.

Puerto Rico must develop and implement new innovative creative approaches to recover and reconstruct incorporating demand generated employment and entrepreneurial opportunities for LMI Income benefit persons beyond the usual overall benefit including any non-LMI benefit persons and should start the calculation of LMI benefit with empirical data such as how many LMI residents can benefit utilizing the Family Self-Sufficiency Program provided for Public Housing Residents, Section 3 compliance program features as well as Title VI that provide opportunities for minorities and those that have traditionally been left out of the economic mainstream of life.

As housing is a leading economic indicator Puerto Rico must seek to incorporate additional affordable, efficient, strong, safe, clean, and decent building options including, modular residential options up to and including employee owned partnerships that provide a P3 initiative such that the economic multiplier effects can be sustained and benefit the entire Caribbean and south American countries as well as Puerto Rico.

A direct Puerto Rican Resilience, Reconstruction, and Recovery Master Plan linked to a Strategic Implementation Plan incorporating the other plans for Puerto Rico- long term- incorporating input from academia, students, NGO’s, faith based, private and international communities. This master plan must be multi-sectorial incorporating models of different scenarios for concise decision making.”

PRDOH Response: As required by HUD, at least 70% of the funding expended under CDBG-DR must be for the benefit of low- or moderate-income persons. PRDOH is committed to leading a collaborative, transparent recovery effort that leverages funding from other available sources.

All programs outlined in the Action Plan have been reviewed for consistency with the Puerto Rico Fiscal Plan and Puerto Rico’s Economic and Disaster Recovery Plan. Thank you for your comments. PRDOH will take them into consideration during further development of programs outlined in the Action Plan or in development of additional programs if additional funding becomes available.

Comment: #189_10-19-18_ Municipio de Guayama

Summary: On 10/19/18, Guayama submitted a proposal to request funds construct over 200 units of housing for LMI families, additional subsidies for rent for LMI families, and rehousing for the residents in Comunidad Borinquen who are at risk of overflow flooding from Rio Guamani.

Infrastructure Funding Requested: \$461,500.00

The Municipality supports land use repurposing as part of the rehousing projects to create passive recreation spaces which can be used as a tourist attraction.

Additionally, rehabilitation of the old train station in Guayama and improvements to Plaza Borinquen. An estimated \$461,500.00 would be needed for this project.

Housing Funding Requested: \$5,500,000.00

Guayama requests funding to be able to purchase 54 units with 70% of construction complete and 120 additional units to start construction in Dulces Sueños.

They also cite the need to relocate the Borinquen Community which is an estimate \$5.5 Million cost using a program they propose called Project Based Vouchers where the municipality would be the subrecipient.

Economic Recovery Funding Request: \$7,500,000.00

Guayama cites using CDBG-DR funding to finish the construction of the football stadium with FIFA recognized dimensions. They estimate a need for \$ 4 million dollars and cite the benefits of employment opportunities, revenue potential and community recreation as part of the benefits for this project.

The revitalization of the urban center is also proposed to address rehabilitating a commercial establishment to attract new small businesses and commercial offices. An estimated \$3.5 million is requested for this project.

They also cite the need to create a hotel building which can improve the overall impacts to business and commercial businesses.

PRDOH Response: PRDOH values a positive working relationship with municipios and looks forward to working with them to serve the people of Puerto Rico throughout the life of the recovery process.

Municipal projects, like those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #190_10-19-18_Providencia Martínez

“I’m requesting information about the program since SBA denied me a loan and I need to build the roof for my house and fix a lift my husband uses that was damaged by Hurricane María.”



PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas.

Comment: #191_10-19-18_Alero Okorodudu (100 Resilient Cities)

“I am writing to voice my support for the Puerto Rico by Design initiative within the Puerto Rico Disaster Recovery Action Plan on page 189. This initiative is based on the Hurricane Sandy Rebuild by Design Competition that was critical for propelling the New York Metropolitan region to rebuild with a forward thinking approach that addresses a changing climatic future.

Following the Hurricane Sandy Rebuild by Design Competition, 100 Resilient Cities (100RC) partnered with Rebuild by Design to take it’s collaborative research and design process to eleven of our member cities. San Juan was one of those eleven and we worked with Rebuild’s process to create a Resilience Plan for the La Playita community. Rebuild partnered with San Juan’s Chief Resilience Officer, the University of Puerto Rico and others to develop initiatives that address the communities’ flooding and water issues. Students spent a semester in the La Playita community, analyzing the issues, speaking with residents and designing multi-benefit solutions for the neighborhoods.

As the communities of Puerto Rico continue to rebuild from the devastation wrought by Hurricane Maria, it is critical that they look to increase their resilience. Rebuilding must address more severe storms but also the other critical shocks and stresses Puerto Rico will face in the 21st century. The Rebuild by Design model takes a holistic approach to rebuilding that includes addressing a multitude of physical and social vulnerabilities; and we encourage Puerto Rico to utilize it.”

PRDOH Response: Thank you for your letter of support. PRDOH is looking forward to the execution of the Puerto Rico by Design program which will create and implement multiple benefit high-impact infrastructure projects and economic development initiatives to ensure long-term growth in Puerto Rico. PRDOH welcomes ongoing collaboration for the life of the Puerto Rico by Design program

Comment: #192_10-19-18_Juan de Dios Videau Soler (Centro Cristo Pobre)

Summary: The Cristo Pobre Center for the Homeless aims to address homelessness and vulnerable populations by utilizing 6.79 to 9.71 acres for new construction for the existing population of 10 people it serves.

Housing funds requested: \$499,403.70

- *Expand the current structure to add 52 beds, increase storage capacity of food, increase the capacity of drinking water reserves, increase the capacity of services without electricity, and expand the parking capacity by acquiring land.*
- *Create a new facility in front of the current Emergency Shelter with a similar capacity.*

PRDOH Response: Projects suggested informed PRDOH during development of the Action Plan. Projects which qualify for Low Income Housing Tax Credits may be eligible for assistance under the CDBG-DR Gap to Low Income Housing Tax Credit (LIHTC) program and Community Resilience Centers are outlined in the Action Plan. The Multi-Family Rehabilitation, Reconstruction and Resilience program provides assistance for rehabilitation, reconstruction, or long-term resilience solutions for multi-family housing projects. Interested parties should monitor www.cdbg-dr.pr.gov for information as it becomes available.

Comment: #193_10-19-18_Carlos Toro (Institute of Building Technology and Safety)

“IBTS appreciates the opportunity to submit comments on Puerto Rico’s Community Development Block Grant Disaster Recovery (CDBG-DR) Action Plan. IBTS’s Division of Energy, Sustainability, and Resilience (IBTS-ESR), fully supports the Plan’s use of solar energy to provide power to residences and community centers during outages, especially after major storms. These plans are outlined in two CDBG-DR programs: (1) Community Energy and Water Resilience Installations, and (2) Community Resilience Centers.

Comment:

We urge the Puerto Rico Department of Housing (PRDOH) to take special care in administering the solar components of these two programs. We recommend that the PRDOH implement a program that requires only nationally-certified contractors and accredited companies to perform the solar energy projects approved in the Action Plan. This will help ensure that the work performed meets nationally-recognized standards and practices.

Discussion:

A report from the Rocky Mountain Institute (RMI) [1] found that a failure to adhere to the best design and installation practices caused some solar systems in Puerto Rico, the U.S. Virgin Islands, and Barbuda, to fail after the 2017 hurricanes. In comparison, they found that systems with better practices survived the storms. This report, as well as others (FEMA [2]), makes specific recommendation for building more resilient solar PV systems, and encourages further study of lessons learned from Puerto Rico and other areas prone to extreme conditions.

Another source of concern, for the successful implementation of solar systems built by the CDBG-DR program, is that with new funds becoming available, inexperienced contractors will start competing for opportunities. This risk has already been highlighted by the Colegio de Perito Electricistas de Puerto Rico [3] and has led to the formation of the Asociación de Consultores y Contratistas de Energía Renovable de Puerto Rico (ACONER), in alliance with the Oficina Independiente de Protección al Consumidor (OIPC) [4], to protect the consumer from poor solar design and construction practices.

Example:

The New York State Energy Research and Development Authority (NYSERDA) has a program that provides a good example. Contractors have to apply to become certified to participate in their

incentive programs. They have to present a formal application documenting their qualifications and pass field inspections of the first two projects completed. Thereafter they are

subject to photo or field inspections of 15% of the systems they install. Experience has shown that simply presenting documents of qualifications and system designs is not good enough — inspections are required to ensure competency.”

PRDOH Response: Thank you for your comment. PRDOH will consider these comments during the development of the Community Resilience and Water Installations and Community Resilience Centers programs.

Comment: #194_10-19-18_Lucille M. Rodríguez (Liga de Cooperativas de Puerto Rico)

“Recently, the Government of Puerto Rico Department of Housing revealed its Puerto Rico Recovery Action Plan that will be administered by the Department of Housing and Urban Development (HUD). The extensive document establishes and anticipates the national recovery projects and the financing programs available to implement it. At the same time these programs allow the participation of community groups, self-management initiatives, and non-profit organizations interested in the contributing to the national transformational and resiliency proposal.

The appearing Liga de Cooperativas is a private non-profit organization created, managed and supported by the Puerto Rico Cooperatives to guard the principles of the model, promote its development and advance the advocacy for the interests of the Cooperativist Movement nationally and internationally. Our affiliates are all types of cooperatives organized within our jurisdiction to address the needs of our people. As part of our membership we have about 200 affiliated cooperatives that manage financing, housing, insurance, commerce, agriculture, production and manufacturing operations and services, among others.

The Cooperative Movement represents an important economic entrepreneurship and social sector in Puerto Rico. Due to its very special nature and the benefits it represents for the development of the country, it enjoys a public policy targeted towards its strengthening and the protection of all its structures. This public policy is clearly established in the Cooperative Societies General Act of 2004, as amended, in the Puerto Rico Cooperative Development Commission Act and other special laws. This public policy promotes the development of cooperativism, recognizes its special nature as social interest companies and promotes the preference of the model in the socioeconomic development of the country. It also presents openness practices in state agencies toward partnership and coordination processes with cooperatives.

In the past and in collaboration with state authorities the Movement has produced extraordinary and successful social, economic development and community empowerment projects. An example of these efforts are the active Puerto Rico Housing Cooperatives organized mostly since the 60s and 70s through which many families in our jurisdiction have received a safe roof and quality of life. Through the cooperative model in Puerto Rico, solar, home, and public housing cooperatives have emerged as well as administrative-type cooperatives or collective or joint property, which are the ones we know now. This last model was possible thanks to the sponsorship of HUD grant programs and the Federal Home Act. Through this program the cooperatives were

able to get financing for the purchase of real estate with only one mortgage as collateral. The partners are owners of the Cooperative and manage it through its governance structures. The Cooperative in turn as an independent legal entity is the owner of the real estate and the one responsible for the liability, conservation and management of the project.

Through many decades in PR, there have been many experiments with different social interest housing focus. However, the only model that has shown its effectiveness in quality of life, safety and community development has been the cooperative housing. Today our historical reality presents new challenges while opening opportunity spaces to respond to the needs of the communities through the development of new projects supported by the cooperative organization.

This is why, having learned about the Recovery Action Plan, the Cooperative Movement expresses its interest in participating in the process and proposing projects that allow us to leverage the funds and financing available for the development of collective housing and cooperativist initiatives. The cooperative system is open to the development of partnerships with the public sector to allow, as in the past, to address the needs of our people through social interest, cooperative and permanent projects.

With regard to that, we strongly request to be allowed to participate in the processes of said plan as well as to receive the necessary information for the development of our development proposals and strategies. We are sure that through this joint effort we would participate in new social and collective entrepreneurship projects to benefit our people.”

PRDOH Response: The Multi-Family Rehabilitation, Reconstruction, and Resilience program, Social Interest Housing program, and CDBG-DR Gap to Low Income Housing Tax Credits (LIHTC) program all provide funding to repair, reconstruction, construction or long-term resilience measures for multi-family housing projects. Interested parties should monitor www.cdbg-dr.pr.gov for information as it becomes available.

Comment: #195_10-19-18_Ponce de Leon 1000 Goram Inc.

Summary: On 10/19/2018, Goram Inc. submitted a project proposal for the renovation and reconstruction of a historic building. Ponce de Leon a community and urban development group located in the entrance of Rio Piedras. Goram Inc is the owner of the emblematic structure and presents a project to renovate and reconstruct a building that is considered historic, commercial and for housing from the 1940's by its zoning designation. Goram Inc is a corporation created for developing this property by Dr. Julio Gonzalez, Gynecologist and Sr. Elliot Ramirez, Publicist.

Planning:

This project proposes to be the start of an ideal development of a boulevard for recreation and cultural exchange meeting place for educators due to its proximity to the university. This structure has been closed for over 7 years.

Housing:

The structure has approximately 22,000 square feet approximately and is 3 floors. The second and third floors are 10,500 square feet with 13 housing units, of which 8 are studios and 5 have 2 bedrooms. The basement would have laundry services This structure rehab and remodel would provide housing units and seeks to comply with all the minimum requirements for housing structures and commercial structures.

Infrastructure Funding Requested: \$3,644,000.00

The property currently lacks infrastructure or facilities to operate. Current architectural designs are provided, and the proposed designs are provided. The copies of permits they have acquired are also included in their submission. Their cost estimate is provided and includes design plans, costs for permits and other endorsements, construction costs, elevator/lift installation, inspection and the portion of investment being provided by Goram Inc. The total estimate is \$3,644,000.00 This commercial development and of housing would provide taxes to the municipio and create employment and provide new units of housing.

Economic Recovery:

It is suggested this structure redevelopment will contribute to the economic wellbeing of the boulevard and be a local tourist attraction for all local San Juan Residents. This commercial development and housing structure would provide taxes to the municipio and create employment and provide new units of housing.

PRDOH Response: Municipal projects, like those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Large transformative projects which create jobs and/or cascading economic impacts may be eligible for funding under the Economic Investment Portfolio for Growth program. Currently available information regarding this program is available in the Action Plan. Further information will be included in the program guidelines, which will be posted to www.cdbg-dr.pr.gov, when it becomes available.

Comment: #196_10-19-18_ Marilyn Santos Colón

Summary: On 10/19/2018, the Municipality of Barranquitas submitted a white paper stating the damages and concerns identified that can be addressed with the designation of CDBG-DR funds.

Barranquitas requests CDBG-DR funding be used to complete the following projects. A general description of necessary plans, project budgets, and summary of impacted households is outlined in the proposal. A detailed listing of roads and bridges to be repaired, along with estimated cost for each is also included in the proposal submitted.

Housing funds requested: \$41,405,520

- *Construct new housing units.*
- *Acquire and rehabilitate public nuisance properties.*

Infrastructure funds requested: \$19,905,520.00

- *Reconstruct and improvements of bridges.*
- *Restore roads and streets.*

Economic Recovery: \$1,500,000

- *Reconstruct the municipal stadium*

PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas. This program is not geographically restricted in Puerto Rico, residents of Barranquitas may be eligible for assistance.

Municipal projects, like those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Large transformative projects which create jobs and/or cascading economic impacts may be eligible for funding under the Economic Investment Portfolio for Growth program. Currently available information regarding this program is available in the Action Plan. Further information will be included in the program guidelines, which will be posted to www.cdbg-dr.pr.gov, when it becomes available.

Comment: #197_10-19-18_Lynn Englum

“I am writing to voice my support for the Puerto Rico by Design initiative within the Puerto Rico Disaster Recovery Action Plan on page 189. This initiative is based on the Hurricane Sandy Rebuild by Design Competition that we carried out in 2013 and 2014. Much like Puerto Rico, a hurricane’s devastation was a wakeup call to the vulnerability that the New York Metropolitan Region faced from climate change and rising seas. The Hurricane Sandy Design Competition called for interdisciplinary expertise to work with local communities on rebuilding for the future. The competition had two stages — collaborative research and collaborative design.

The purpose of the research stage was for the international experts to develop a comprehensive understanding of the social and physical vulnerabilities facing the entire region, while the design stage utilized the research discoveries to develop innovative, implementable solutions with the stakeholders and community members who would use the infrastructure.

The Action Plan calls for following the Rebuild by Design model for the Puerto Rico by Design initiative and we strongly support this as it was successful in generating innovative solutions that addressed water management, green infrastructure, ecology, mobility, recreation and workforce development. During the process, the two step methodology created true collaboration as we worked with 535 community organization, 181 government entities and 25 universities throughout the region.

The solutions created by this collaboration are now being implemented in New York City, Long Island, New Jersey and Connecticut utilizing over \$1 billion CDBG-DR funding. The Rebuild by Design process has subsequently been deployed in both disaster and pre-disaster settings. The Bay Area Resilient by Design Challenge which was a replication of the process in a pre-disaster setting mobilized international talent to work with San Francisco Bay Area governments and communities to create nine large scale proposals to address sea level rise, transportation, housing and equity.

The process has also been used in nine other cities in the US and abroad on smaller scales including in the La Playita neighborhood in San Juan in 2015-2016 to create a community driven resilience plan working with the University of Puerto Rico Architecture School, the City of San Juan, local architects and 100 Resilient Cities. There are several key characteristics to the Rebuild model that are critical to a successful process that we want to highlight. Many of these are included in the initiative within the Action Plan and we applaud their incorporation.

- *We recommend that you take an interdisciplinary approach to the competition, by asking for diverse expertise from participating teams. In order to determine all the linkages between Puerto Rico's various vulnerability such as health, water transportation, economic development, etc. this is a critical aspect.*
- *All solutions generated need to be implementable and take a multi-benefit approach, meaning that project proposals are both realistic and protect against vulnerability while also providing benefits during non-disaster times.*
- *Extensive community engagement is essential in bringing important expertise that should be utilized in the creation of any large infrastructure investment. Creating a process and structure that requires their involvement and input generates better designs and ultimately provides critical local support and legitimacy for building the projects.*

We are excited that the Puerto Rico Disaster Recovery Action Plan includes the Puerto Rico by Design initiative and was modeled after our Rebuild by Design process. We offer our expertise to you to assist in developing the details of the initiative."

PRDOH Response: Thank you for your letter of support. PRDOH is looking forward to the execution of the Puerto Rico by Design program which will create and implement multiple benefit high-impact infrastructure projects and economic development initiatives to ensure long-term growth in Puerto Rico. PRDOH welcomes ongoing collaboration for the life of the Puerto Rico by Design program.

Comment: #198_10-19-18_Zoe Siegal (Resilient by Design)

"It is my pleasure to extend my support for the inclusion of Rebuild by Design inspired design competition as part of the Puerto Rico Disaster Recovery Draft Action Plan. The Rebuild by Design Hurricane Sandy Design Competition changed the way the federal government responds to disaster and has become a cutting-edge model for climate adaptation work throughout the world.

As the Managing Director of Resilient by Design | Bay Area Challenge, a similar design challenge that ran from May 2017 - May 2018, I know that this effort will connect local communities with

some of the nation's leading design firms to collaboratively address vulnerabilities that were exposed by Hurricanes Maria and Irma. During the Resilient by Design process, nine implementable designs were created to address ongoing climate issues facing the Bay Area, such as sea level rise, severe flooding, and seismic risks, alongside other, sometimes more pressing challenges, including lack of housing, displacement, gentrification, limited access to public land and outdated transportation. Teams made of local, national and international designers and experts worked with 23 community partner organizations, over 100 public officials and agency staff, and held 40 public events put on with community and educational partners throughout the region.

Using the Rebuild by Design model created an opportunity for collaboration, creativity and innovation that had not previously been seen in this region. The design solutions proposed were varied in scope and scale and all of them provide multiple benefits to local communities around San Francisco Bay. The design interventions use nature-based, cost effective ideas to reduce flood risk while creating more accessible open space, protecting infrastructure such as highways, public transportation and wastewater treatment plants, and creating development opportunities for needed homes and jobs in the region.

The projects emerging from Resilient by Design ranged from neighborhood-scale interventions to ideas that spanned multiple counties, showing the flexibility of this model to provide replicable ideas that can be used throughout the region. This process is an innovative and multifaceted approach to climate resilience and results in implementable projects that celebrate multi-benefit infrastructure, local knowledge and strong community engagement. While Rebuild by Design is focused on water sector projects it also addresses issues such as equity and workforce development creating innovative solutions for a variety of challenges. We strongly encourage Puerto Rico to implement this innovative and cost effective format as part of the disaster recovery program to address the devastation caused by Hurricanes Maria and Irma.”

PRDOH Response: Thank you for your letter of support. PRDOH is looking forward to the execution of the Puerto Rico by Design program which will create and implement multiple benefit high-impact infrastructure projects and economic development initiatives to ensure long-term growth in Puerto Rico. PRDOH welcomes ongoing collaboration for the life of the Puerto Rico by Design program.

Comment: #199_10-19-18_Jonathan Castillo (Instituto Nacional de Energía y Sostenibilidad Islaña)

“I hope this finds you well, I’m writing because at the INESI together with the microgrid lab we’re looking for the possibility of write you a proposal, but first of all, we would like to know if there is a possibility to receive funds for it. It would be very useful since besides the impact we would have at the educational level and the training the students and teachers would receive. We would gather real information about energy consumption in these homes and consumption patterns. This information will also help us determine effective methods for educating the public, which is necessary for the introduction of renewable energy to the houses in PR. We could use this information to develop a report that could be very useful for the department. We are very excited

with this idea and any recommendation and/or support to make it happen for us would be very helpful. We are very committed with this work to help PR to introduce renewables to their homes.

Attached please find a summary of the project we're thinking about".

A contest among private and public high schools where we would offer several contact hours with energy education to include topics of Generation, transmission and distribution.

Basic information about the current electric grid

- *Energy efficiency and appliances*
- *How to calculate your consumption*
- *How to reduce it*
- *How to calculate how much energy your appliances consume*
- *How to use energy efficiently*

Climate change

- *the effects of producing energy with fossils*
- *the positive change of generating energy with renewables*

Renewable energy

- *Appropriate sources in PR*
- *How to know which equipment fits your home according to:*
 - *Space available*
 - *Number of people in the home*
 - *Energy consumption in the home*
 - *Type of resource according to where the home is located*

The contest consists of creating an individual or group project where they can adjust power generation with renewable sources in their home. The idea is for students to take a electricity bill from their home or home of the group selected, be it with the tools we had previously provided about how to read the consumption in a bill and they start to make the necessary adjustments to decrease the consumption. With the tools we have provided them, they should take as a modality a change in the consumption trying to reduce it. Finally, they should develop a renewable energy project for the home including prices, capacity, space and coverage of the power needs of the home.

These projects in their last stage should reflect an adaptation of a renewable energy system for their home, how much costs the installation space in the home. We provide them the data about how much the PV or Aerogeneration kilowatt costs installed in PR. How much are the savings in the electricity bill, how much are the savings in the greenhouse gas emissions and how much time it takes to recover the investment.

The purpose of this project is for the students to be exposed to climate change topics and sustainable energy alternatives through active learning. At the same time we're looking to impact the consumption culture of homes of hundreds of students providing an incentive during this whole period for change in the way energy is consumed at home. In the process, this will save hundreds of pounds of CO2 launched into the environment and as part of a general report the data for all the participants will be included so they see how much they helped the environment together by changing their consumption habits without investing money.

This could be a project that provides a guide about the strategies that should be followed to produce changes in energy consumption in the population. Currently we have heard a series of microgrid projects or micro islands looking to replace the generation with fossils with renewables, but even though it's infinite the ability to capture energy isn't and if we are talking about transition fuels what will make that transition possible is a change in the way we consume energy.

With your support we will be able to launch a pilot project where we will document its faults and virtues to improve it. Also, with this we will be preparing students in their pre-college stage to address the challenges the country is facing."

PRDOH Response: The Home Energy Resilience Competition is a competition to identify innovative solutions to address home-based renewable energy generation, energy storage, and home functions. Large transformative projects which create jobs and/or cascading economic impacts may be eligible for funding under the Economic Investment Portfolio for Growth program.

PRDOH thanks you for your comments.

Comment: #200_10-19-18_ Cristina Méndez (Aerostar Airport Holdings, LLC)

Summary: On 10/19/2018, Aerostar Airport Holdings LLC submitted a letter of commentary which outlines suggested modifications to the Economic Development Investment Portfolio for Growth Program and the Critical Infrastructure Resilience Program.

Economic Development Investment Portfolio for Growth Program:

- *Develop sustainable energy sources to serve as the primary power source for the Luis Muños Marín International Airport*

Critical Infrastructure Resilience (CIR) Program:

- *Modify the CIR program to include activities not receiving assistance from FEMA or other federal assistance.*
- *Include other governmental agencies as subgrantees or sub-recipients.*
- *Clarify "smaller scale utility security" under the program description.*

PRDOH Response: Thank you for your Comment. PRDOH will take this input into consideration during further development of the programs or during development of new programs if additional funding becomes available.

Comment: #201_10-19-18_Brad Dean (CEO of Discover Puerto Rico)

Summary: On 10/19/2018, Discover Puerto Rico submitted a letter of commentary which outlines an approach to the tourism promotion of Puerto Rico and the request for participation in the Tourism and Business Marketing Program. The following is an outline of the commentary:

Introduction:

- *Discover Puerto Rico is Puerto Rico's non-profit Destination Marketing Organization.*
- *Analyzes the importance of tourism marketing and the opportunity it provides to transform the island.*

Commentary:

- *Discover Puerto Rico is prepared to provide a destination marketing program to begin an industry come-back.*
- *An analysis of other CDBG-DR funds allocated to tourism promotion in New York, New Jersey, and New Orleans and the timeline of recovery which suggests the importance of tourism as a driving force behind the economy.*
- *People in Puerto Rico depend on the tourism industry (approximately 77,000 employees).*
- *An analysis of the decrease in visitors over an 8-year cycle.*
- *Issues with the perception of Puerto Rico as a visitor destination.*
- *Puerto Rico's disparity between supply and demand.*

Request for participation:

- *Discover Puerto Rico has a unique opportunity to accelerate the economy.*
- *Discover Puerto Rico can accelerate the economy by stabilizing the tourism industry and optimizing opportunities.*
- *Discover Puerto Rico is committed to promoting the entire island.*
- *Discover Puerto Rico, with the support of private industry partners, proposes a strategic marketing campaign which will begin in 2019.*

Strategy Overview:

- *Targeted Investing.*
- *Planned sales and marketing.*
- *Drive economy growth.*
- *Create visitor economy jobs.*

PRDOH Response: These suggestions and recommendations have informed PRDOH during the development of the Tourism and Business Marketing Program. Currently available information regarding this program is outlined in the Action Plan.

Comment: #202_10-19-18_Harry Cook (McConnell Valdés LLC)

Summary: On 10/19/2018, McConnell Valdés LLC submitted a letter of commentary which outlines suggested modifications to the Economic Development Investment Portfolio for Growth Program.

Economic Development Program:

- *Expand the public services initiatives to include health care facilities and services.*

PRDOH Response: Thank you for your Comment. PRDOH will take this input into consideration during further development of the programs or during development of new programs if additional funding becomes available.

Comment: #203_10-19-18_Harry Cook (Sunstone Properties)

Summary: On 10/19/2018, McConnell Valdés LLC submitted a letter of commentary which outlines suggested modifications to the Multi-Family Reconstruction, Repair & Resilience Program.

Multi-Family Reconstruction, Repair & Resilience Program:

- *Increase the amount allocated to Multifamily Housing.*
- *Inclusion of programmatic approach.*
- *Inclusion of Pre-development Grants.*

PRDOH Response: Thank you for your comment. PRDOH will take these comments into consideration during further development of the Multi-Family Reconstruction, Repair & Resilience Program. Currently available information regarding the allocation, approach, and award caps is outlined in the Action Plan.

Comment: #204_10-19-18_Eduardo Canelas (Metropistas)

Summary: On 10/19/2018, Metropistas submitted a letter of commentary which outlines suggested modifications to the Critical Infrastructure Resilience Program.

Critical Infrastructure Resilience (CIR) Program:

- *Modify the CIR program to include activities not receiving assistance from FEMA or other federal assistance.*
- *Include other governmental agencies as subgrantees or sub-recipients.*
- *Include privately-operated highways as eligible activities.*

PRDOH Response: Thank you for your Comment. PRDOH will take this input into consideration during further development of the programs or during development of new programs if additional funding becomes available.

Comment: #205_10-19-18_Javier Llano (Oldaker Group)

“Dear Secretary Gil:

Good afternoon.

We are working with a non-profit that wants to submit a grant proposal as a sub-recipient of CDBG-DR funds so they can deliver immediate and unmet infrastructure related to lifeline services, public safety, and economic resiliency. The non-profit will be filling out the attached procurement process registration form and will have completed the HUD Compliance Certification. We would like to know how / where should they submit the grant for consideration, and should they submit the grant as a comment to the Action Plan?

The deadline for comments is this coming Sunday October 21st 2018. What is the deadline to submit a grant? The same day? Should they submit the grant as a comment?

Please advise. I am copying part of the team that have been working on the grant. Thank you for time and respond to this matter.

Enthusiastically,”

Attached to email: “Abstract for Proposed Energy Independent Island Wide Emergency Response and Business Continuity Infrastructure Network”

“Puerto Rico Hospital Association Need and Proposed Solution:

First responders and Public Safety organizations such as the Puerto Rico Hospital Association (the Association) require a unified Land Mobile Radio (LMR) communications network that will allow all related organizations (e.g. Hospitals, Urgent Care Clinics, Dialysis Centers, Pharmacies, Ambulances, EMT’s, etc.) to communicate with each other, at all times, in a unified and efficient manner, and coordinate between the public and private sector quickly in responding to and recovering from a natural disaster.

The Association has made the decision to deploy an Energy Independent Island Wide Emergency Response and Business Continuity Infrastructure Network based on DMR technology. The Association has determined the network is a necessary expense related to disaster relief, long-term recovery, and restoration of infrastructure, housing and economic revitalization. Most importantly, it solves an unmet infrastructure need that will save lives. In addition, the network will ensure critical public safety supply chains supported by small, medium and large businesses operating in the US territory of Puerto Rico remain resilient and that lifelines remain open.

The goal of this initiative is to:

- Integrate with Local (Police, Fire & Rescue, EMT’s, etc.) and Federal authorities (FEMA, DHS, etc.) to facilitate communication and coordination during emergencies.*
- Be energy independent and self-sufficient (no dependence on PREPA).*
- Be designed with complete and total redundancy in order to ensure communication at all times before, during and after natural disasters.*

- *Facilitate both communication, data connectivity and site monitoring (e.g. security, generators, diesel fuel, battery backup, etc.) for Hospital Association members and PR healthcare stakeholders.*

The Association, as a bona fide non-profit organization, is an eligible entity to receive CDBG-DR funding under section 105(a) (15) of the HCD Act, and is seeking grant funding as a subrecipient to PRDOH. It is eager to submit a grant to the appropriate counterparty and can deliver its solution within 90-120 days.

Due Diligence:

The Puerto Rico Hospital Association carefully reviewed the Federal Emergency Management Administration's (FEMA) 2017 Hurricane Season FEMA After Action Report July 12, 2018 (FEMA Report), Governor Ricardo Rossello's November 2017 Request for Federal Assistance for Disaster Recovery titled Build Back Better Puerto Rico, the Puerto Rico Department of Housing (PRDOH)'s June 14, 2018 First Action Plan submission to HUD on various ways to distribute \$1,507,179,000 in CDBG-DR funds through HUD grant number B-17-DM-72- 0001, The Puerto Rico Central Recovery and Reconstruction Office (COR3) Transformation and Innovation Plan submitted to Congress August 8, 2018, The fiscal Plan for Puerto Rico as submitted to the Financial Oversight and management Board for Puerto Rico on August 20, 2018, PRDOH's Second Action Plan posted for comment September 21, 2018, and relevant affiliated documents. In addition to these documents, the Association has culled data and feedback from the US Congress, its Association membership, key public safety stakeholders, the media, publicly available information, and federal and local government agencies in identifying this communications network solution.

Background, Challenges and Proposed Solution:

La Asociación de Hospitales de Puerto Rico (Puerto Rico Hospital Association, or Association), founded in 1942, and its membership bring together 67 of the 70 hospitals duly licensed in Puerto Rico. The Association represents other institutions, such as: Diagnosis and Treatment Centers, Independent Ambulatory Surgery Centers, Ambulatory Services Centers, Health Homes, and distinguished figures in the health care field among others. Its purpose and mission are to ensure excellent health quality standards for all communities in Puerto Rico.

As a result of the damage inflicted on Puerto Rico by Hurricanes Irma and Maria, the residents of Puerto Rico suffered tremendous losses of life due to a host of reasons, much of which was due to a lack of communications that permitted the different Public Safety organizations to work together. The failure of this lifeline infrastructure and the Association's inability to communicate between public safety organizations, government (federal and local), first responders, medical institutions and private sector institutions delayed the recovery and more importantly affected the Puerto Rico government's ability to attend the medical needs of American citizens residing in the Island. Such failure was noted in an August 29, 2018 study the government did in conjunction with the Milken Institute School of Public Health at The George Washington University.

The George Washington University study reports that Puerto Rico Government personnel and key leader interview respondents indicated that communication contingency plans were not in place to anticipate multiple cascading failures of critical infrastructure and key resource sectors. Consequently, the central government was not prepared to use alternative communication

channels for health-related and mortality surveillance, public health information dissemination and coordination with communities, including radio and interpersonal communication. Further, an Urban Institute research report for the Puerto Rico Health Care Infrastructure Assessment stated that a shortage of medical professionals such as midlevel providers like physician assistants, nurse practitioners and specialists exacerbate the needed infrastructure reforms.

Understandably, without a functional telecommunication system, during and after a major storm or other natural disaster, the Association experienced a communication breakdown between its hospitals, doctors, and service providers. The Association faced severe complications in determining site status, where goods and services were most needed, and was unable to appropriately coordinate with FEMA and other federal agencies. Pharmacies struggled to stay open, access to patient therapies were unreliable / unavailable, and the important patient / doctor relationship compromised. Patients faced undue psychological consequences and hopelessness as they waited for support that was unable to respond, and sadly, the communications breakdown put the Association in a precarious position to deliver life-saving therapies. The lack of reliable, fully operative telecommunication facilities not only impacted public safety on the island but it caused irreparable damage to Puerto Rico's economy and has negatively impacted thousands of small businesses, the heart of the island's private sector and its principal job creator. Businesses in Puerto Rico were unable to communicate effectively with their employees, suppliers, customers, banks, and health and security-related entities, among others, resulting in a supply chain failure, more closed businesses, loss of jobs, increased migration, and loss of revenue to a government currently faced with serious financial problems. These challenges unnecessarily increased the death toll on the island and made an already challenging recovery worse.

Disturbing factors that complicate the situation further and call for urgent corrective action to minimize the island's telecommunication problems, is that Puerto Rico's hurricane season extends from June 1 to November 30 and the island's mountainous center, where many telecommunication towers are located, are always very adversely affected and take a longer time to repair.

It is important to remember the initial and sometimes prolonged human hardship caused by telecommunication problems on individuals and their families, such as: not being able to go to work or school; shop for food either because stores were closed because of damage or for lack of supplies or long lines (the same for gasoline); not having cash because most banks were closed and ATMs were not functioning; not being able to call for medical services or go to hospitals because many were closed or not offering all essential services; not being able to call police or the fire department in emergency situations; and not being able to communicate with relatives, on or off-island, who were very concerned with their well-being.

Currently, many emergency medical service (EMS) crews and their hospitals require two dispatchers to radio communicate with one another because EMS has its own Land Mobile Radio (LMR) system, while hospitals typically use the police LMR system and the two systems are not interoperable. Puerto Rico's Federal, State and Local government agencies have never had a resilient, island-wide and truly interoperable communications system, and the private sector

Telecommunications Providers Networks were not resilient enough to survive a major hurricane. The inability to communicate cost lives.

As a result of the lessons learned from the recovery after Hurricanes Irma and Maria and the Association's extensive due diligence, it has made the decision to deploy an Energy Independent Island Wide Emergency Response and Business Continuity Infrastructure Network based on DMR technology. Network Integration will follow a two (2) phase approach. Initial phase will be integrated with all medical facilities in the Public and Private sector in order to concentrate on getting the network deployed, customers integrated and accustomed to utilizing the network. Then the network will enter into Phase 2 where the network will be integrated with Federal, State and municipal government agencies in order to better integrate Private Sector and Public Sector institutions that make up the backbone of Disaster Recovery.

The Association is ready to submit its grant, looks forward to opening a dialog on this important unmet infrastructure need that will save lives, and appreciates PRDOH's consideration."

PRDOH Response: Information regarding procurement, including Requests for Proposals (RFP), will be posted to www.cdbg-dr.pr.gov. PRDOH encourages interested parties to monitor the website for opportunities. Non-profit entities are eligible to apply for assistance under several programs outlined in the Action Plan.

Comment: #206_10-19-18_Natalia Robles (PRHTA)

"In the last few years Tourism has experienced continued growth for Puerto Rico, becoming one of the most important drivers for economic development on the Island. Employing -direct and indirectly- more than 80,000 people, this economic sector plays a very important role in securing the Island's recovery and road to a sustainable growth.

Both private and public sector are working hard to elevate our touristic product, while improving our footprint in the communities we serve. With the creation of the new DMO (Destination Marketing Organization), Discover Puerto Rico, our destination counts with a dedicated team in charge of promoting the Island through an integrated strategy in order to bring visitors. By attracting more tourists we will have job security and create new jobs around the tourism activity. The advertising of our touristic product is key to optimize the recovery process and increase the positive impact in communities around the Island, especially those that need economic assistance.

During and after the emergency we saw how communities worked tirelessly with minimal support or resources to lift their towns and prepare their surroundings and business to welcome back visitors. Now is the time to keep nourishing that spirit of improvement and allocate funds into the promotion of the Island to support Discover Puerto Rico's effort. We are certain that by giving the appropriate amount of resources Discover Puerto Rico will produce positive and incremental results for Puerto Rico.

We hope this important effort can be considered into the sustainable economic growth plans you may have for Puerto Rico."

PRDOH Response: Thank you for your comments. Information regarding the Tourism and Business Marketing program is outlined in the Action Plan. PRDOH will take your comments

into consideration during further development of the Tourism and Business Marketing program.

Comment: #207_10-19-18_Reinaly Quintana Serrano (Rv General Contractor)

Summary: On 10/19/2018, RV General Contractor submitted a proposal which outlines the revitalization of the Old Municipal Cemetery of San Sebastian located at Calle Segundo Ruiz Belvis.

Economic Recovery funds requested: \$3,800,000

- *Rehabilitation of urban areas.*
- *Attract economic activity.*
- *Protect the safety and security of the cemetery grounds.*
- *Reinforce concrete exteriors.*
- *Restore historical value.*
- *Restore 294 resting spaces.*
- *Reconstruct the chapel and conversion of damaged space to a museum.*

PRDOH Response: Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #208_10-19-18_Zaid Díaz Isaac (Municipio de Caguas)

Summary: On 10/19/2018, Municipio de Caguas submitted a letter of commentary which outlines suggested modifications and requests for clarification to the Whole Community Resilience Planning, the Home Repair, Reconstruction, and Relocation Program, the CDBG-DR Gap to Low Income Housing Tax Credit (LIHTC), Community Energy and Water Resilience Installations, Homebuyer Assistance Program, Small Business Financing, Strategic Projects and Commercial Development, FEMA Coordination, and the City Revitalization program.

Whole Community Resilience Planning:

- *Request for clarification regarding eligibility for reimbursement.*

Home Repair, Reconstruction, and Relocation Program:

- *Coordinate with municipios and FEMA for the development of this activity.*

LIHTC:

- *Request the list of projects being considered under this program.*

Community Energy and Water Resilience Installations:

- *Amend this program to include the compliance of clean water.*

Homebuyer Assistance Program:

- *Request for clarification regarding the involvement at the municipio level.*

Small Business Financing:

- *Provide “green” loans to incentivize solar energy or photovoltaic systems.*
- *Ensure transparency of information between the sub-recipient and municipio through the execution of this program to avoid duplication of efforts.*

Strategic Projects and Commercial Development:

- *Request for clarification regarding eligible sub-recipients.*

FEMA Coordination:

- *Request for clarification regarding the Benefit from both the match program and the Critical Infrastructure Resilience Program.*

PRDOH Response: Thank you for your comment. Further definition regarding application periods, required documentation, and the process used to determine eligibility for all programs will be outlined in more detail in the program guidelines. Program guidelines and policies will be posted to www.cdbg-dr.pr.gov, after programs have been approved by HUD, as required by 83 FR 5844 and 83 FR 40314.

PRDOH is committed to leading a transparent recovery effort. Information concerning procurement, expenditures, program progress and other pertinent information will be posted to www.cdbg-dr.pr.gov as it becomes available.

Comment: #209_10-19-18_Ivette Colón Meléndez

Summary: On 10/19/2018, Municipio de Cataño submitted a proposal which outlines the revitalization of the Emergency Operations Center which also operates as an Office of Emergency Management, Disaster Management, and Medical Emergencies.

Multi-Sector funds requested: \$1,000,000

- *Replacement of windows, doors, furniture, etc.*
- *Installation of an electric generator*

PRDOH Response: Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #210_10-19-18_Ernesto Valle (Nature Housing Senior Community Inc.)

Summary: On 10/19/2018, the Nature Housing Senior Community submitted a white paper requesting CDBG funding to supplement funding already allocate for the development of a housing facility for elderly persons. The development will take place on a 6,500 square meter lot and will have 80 units.

PRDOH Response: Projects which qualify for Low Income Housing Tax Credits may be eligible for assistance under the CDBG-DR Gap to Low Income Housing Tax Credit (LIHTC) program, outlined in the Action Plan. The Social Interest Housing program aims to provide dignified, resilient housing for vulnerable populations, including the elderly. The Multi-Family Rehabilitation, Reconstruction, and Resilience program provides assistance for rehabilitation, reconstruction or installation of long-term resiliency measures for multi-family residential projects. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #211_10-19-18_Pedro Santiago Rodríguez (Municipio de Naranjito)

Summary: On 10/19/18, the Municipality of Naranjito submitted a proposal which provided demographic information and information on unmet needs in Naranjito. Additionally, Naranjito submitted proposed activities to be funded under CDBG-DR.

Naranjito requests CDBG-DR funding be used to complete the following projects. A detailed description of project plans, phased project budget, project locations, summary of impacted populations/areas, and national objective associated with each activity is outlined in the proposal.

Housing:

- *Acquire and rehabilitate public nuisance properties.*
- *Rehabilitate existing housing units impacted by hurricanes Maria and Irma.*
- *Construct new housing units and relocate families from flood prone areas to these new housing units.*

Infrastructure:

- *Acquire and rehabilitate existing structures for the construction of an emergency operations center.*
- *Rehabilitate spaces to create community center to provide social and psychological services to aid in the recovery of hurricanes Irma and Maria victims.*
- *Flood control and mitigation.*
- *Restoration of public roads.*
- *Rebuild lighting and electrical systems.*
- *Construct a sanitary sewer system and wastewater treatment plant.*
- *Construct a canalization extension to aid in flood control.*

Documentation regarding the most impacted areas, communities affected, IA registrations, trends by zones and divisions, survivors, photos/maps of damages, letter of intent, public obstructions and title searches were also provided with this proposal.

PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas. This program is not geographically restricted in Puerto Rico, residents of Naranjito may be eligible for assistance.

Municipal projects, like some of those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #212_10-19-18_Ramon L. Acevedo (Municipio de San Germán)

Summary: On 10/19/2018, the municipality of San Germán submitted a proposal which included a community impact assessment on structure for structures and affected populations, suggested activities to be funded under CDBG-DR.

San German suggests the following activities be funded under CDBG-DR funds. Project details and projected timelines for completion are available in the proposal.

Housing funds requested: \$27,789,167

- *Construct new housing units.*
- *Construct multi-family housing projects.*
- *Acquire and rehabilitate public nuisance properties and vacant land.*
- *Relocate families out of high-risk areas.*

PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas. The Social Interest Housing, CDBG-DR Gap to Low Income Housing Tax Credit (LIHTC), and Multi-Family Rehabilitation, Reconstruction and Resilience programs all provide funding for creation or rehabilitation of multi-family housing projects. These programs are not geographically restricted in Puerto Rico, residents of San Germán may be eligible for assistance.

Comment: #213_10-19-18_Kariner Torres (Municipio Santa Isabel)

Summary: On 10/19/2018, the municipality of Santa Isabel submitted a proposal which included a community impact assessment on structure for structures and affected populations, suggested activities to be funded under CDBG-DR.

Housing:

- *Relocate residents from three areas prone to flooding and landslides.*
- *Acquire and rehabilitate properties and vacant land.*

- *Demolish, rehab, or reconstruct public buildings.*

Infrastructure:

- *Replace the sanitary and storm sewage system in the urban area.*
- *Construction of a coastal barrier to prevent storm surge.*

Economic Development:

- *Remodel the pier to revitalize the tourism of nearby shops and restaurants.*
- *Restore Villa Pequera to revitalize affected stores and restaurants.*

PRDOH Response: The Home Repair, Reconstruction, or Relocation program provides assistance to homeowners to rehabilitate or reconstruct homes or provides a voucher for voluntary relocation out of hazard-prone areas. This program is not geographically restricted in Puerto Rico, residents of Santa Isabel may be eligible for assistance.

Municipal projects, like some of those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #214_10-19-18_Jenny P. Castro Morales

“My name is Juana P. Castro Morales, I’m from the town of Guánica. I need help to get the property title from the municipal lot where my house is located because SBA approved a loan for repairing the damage to my house because of Hurricane María, which was on stop because I don’t have the necessary ownership title for the municipal lot and I have until December for SBA to give me the loan”.

PRDOH Response: Currently available information about the Title Clearance Program can be found in the Action Plan. The goal of this program is to provide clear titles to homeowners throughout Puerto Rico

Comment: #215_10-19-18_Jessie Guerrero (Ponce Neighborhood Housing Services, Inc.)

“The comments presented are targeted to the housing area proposed in the Action Plan.

Mortgage – Mortgage Mitigation Assistance Program

- *In the Mortgage Mitigation Assistance Program, a partial claim should be considered to the principal of the mortgage loan to really help the client permanently and not partially. The person will have a decrease in the amount of the mortgage principal, which represents a reduction in the monthly mortgage payment. This will result in financial relief for the clients presenting an excessive financial burden for their deteriorated or affected income due to Hurricane María. If the mortgage principal balance is \$75K and an X amount is presented for it, the mortgage decreases immediately. As a result, the monthly payment*

decreases and allows the client to recover financially. FHA has a similar system targeted to clients with back ratios on what's established as satisfactory.

Home Acquisition – Buyer Assistance Program

- *Provide One-on-one Housing Counseling and workshops for First Buyers to every client interested in buying his or her first home. This way assertive action plans are put in place among the clients and the Housing Counseling Agencies (Non-Profit), that ensure the Counseling Program participant is financially trained and educated. The result of this counseling can be perceived in an educated and prepared client to assume responsibly a mortgage payment, reducing the risk of falling in a mortgage foreclosure and having their home embargoed.*
- *For the Matching Funds savings program to buy a home, the time to complete it should be reduced between a minimum of 10 months to a maximum of 24 months and not 3 years as suggested. Minimizing the amount of time, gives the client an incentive to achieve the saving goal based on the need for each case. For this Program, the deposits should be monthly and establish a specific fixed amount for a specific amount of time. This is analyzed and identified after a financial and budget analysis with a certified housing counselor from a certified Housing Counseling Agency.*
- *Foreclosed and Abandoned Houses. An inventory of these properties should be provided at affordable prices to non-profit organizations dedicated to the development and rehabilitation of affordable housing. These organizations are capable of developing rehabilitation and acquisition projects of these properties for families that have been financially trained and educated by them. These families have been prepared by improving their credit score and managing their budget, which makes them ideal candidates to buy a home through the Island's Financial Institutions. This strategy minimizes the inventory of foreclosed homes that greatly hurt the local bank loan portfolios and the regional economy.*

Housing Counseling Programs by Certified and Licenced Agencies

- *Certified PR Housing Counseling Agencies (Non-profit) should play a vital role in the recovery and reconstruction of PR. Starting with the Housing Counseling in all the stages. The families should be directed to a non-profit organization to begin their education and counseling to buy their first home. They offer a variety of services from budget and credit management (crucial during the home purchase process) and first-time buyer workshops, which provide the necessary tools so they can identify the best product in the market that fits their needs and budget. Participating in these counseling sessions and workshops we minimize the risk of a future mortgage foreclosure and having their home embargoed. In addition to the families having to take mortgage foreclosure prevention workshops, which provide credible and assertive information on effective budget and finance management strategies to prevent defaulting on mortgage payments.*

Fund Distribution for Certified Housing Counseling Agencies (Non-profit)

- *The distribution of the funds assigned to the non-profit organizations that are Certified Housing Counseling Agencies should be equally organized by regions and without competition. Each organization should be assigned a region of the Island, preferably attuned with the regions it already addresses and establish specific and real goals about the amount of clients it will assist in a specific period of time.*

Home Acquisition Assistance Vouchers for Employees that Assisted in First Response

- *Assign part of the funds for the award of Home Acquisition Assistance Vouchers to Employees that Assisted in First Response who were severely affected during and after Hurricane María.*
- *May these employees include: Police officers, firefighters, medical emergency personnel, emergency management personnel and non-profit organizations that provide direct services related to: housing, social, community, and first response services; whose work and social responsibility before this disaster has been significant for the development of our communities. This way, they would be able to purchase an affordable and safe home, providing a better quality of life for them and their families.*

Distribution of Funds for the award of loans through Certified Agencies, such as CDFI, ONG and OCIF

- *Assign funds to certified agencies, such as CDFI, ONG and OCIF so they can offer low interest loans to their clients. These agencies have the financial ability and experience necessary to provide excellent service to their clients. Ensuring they acquire the basic knowledge and tools understanding the responsibility of acquiring a mortgage debt. Thus reducing the possibility of mortgage foreclosure, embargoes and loss of homes in the long term. This way financial products will be offered that adjust to the needs of low- and middle- income clients and families, for which sometimes accessing financial loans and other housing services is difficult.”*

PRDOH Response: Thank you for your comments. PRDOH will consider these suggestions and recommendations during further development of the Homebuyer Assistance Program and Mortgage Catch-Up program. Individuals participating in the Homebuyer Assistance program will receive housing counseling services to educate to prepare prospective homebuyers and to inform them of the responsibilities of being a homeowner.

Comment: #216_10-19-18_Lizbeth Sánchez

“The plan addresses the topic of displacement very incomprehensibly logistically, technically, and above all I don’t see clear mitigation policies. When someone talks about displacements at the human level, it’s already a controversial topic because behind the purpose that is displacing, it has to be accompanied by a “why, when and where would they go?” which many times faces resistance from the people when they don’t want to leave their home. So, before talking about displacement, let’s talk about the logistics of relocation”.

PRDOH Response: Thank you for your comment. All relocation offered in the PRDOH Action Plan is voluntary.

Comment: #217_10-19-18_Hector E. Pietri Rivera and Nancy Gutierrez Rosario

"Hurricane María was the worst natural disaster to impact Puerto Rico on September 20, 2017 with maximum winds of 175 miles per hour. It reached the intensity peak in Maunabo and Yabucoa because it was between those two towns where the eye touched ground in PR. Catastrophic damage southeast of the Caribbean CAT 5 where at the same time a number of tornadoes were reported.

Reconstruction: to address the structural weaknesses with emphasis on people 60 years or older, people with disabilities regardless of their social security income, retirement, so their income doesn't represent an obstacle for improving their housing or public safety or health.

Emphasizing areas of major damage where until now no assistance has been provided.

Ideas: Neighborhood Watch for any type of suspicious activity, to identify them to and assist the most vulnerable, elderly people or people who are alone. Create a community board

Safety: Build accessible sidewalks, ramps, signage where pedestrians can use them.

Priorities: Roof, power, water, fencing, home protection fence, culverts, illumination installation, hydrants, water pumps

That the repair funds be distributed via card to buy building materials and supplies with one of the renowned construction hardware companies in the US and Puerto Rico like Home Depot

Very important: Keep the residents informed through social media, radio and television and every cent used from these CDBG-DR 2018 funds."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. PRDOH is committed to incorporating resilience and mitigation measures throughout the recovery process, when possible.

PRDOH is committed to leading a transparent recovery. Information regarding expenditures, program performance, procurement, and other aspects of the recovery will be publicly posted at www.cdbg-dr.pr.gov, as information becomes available.

Thank you for your comments; PRDOH will take them into consideration during further development of the programs outlined in the Action Plan.

Comment: #218_10-19-18_Iris M. Gracia Montes

"I have to move because the kitchen and the dining room ceiling is broken and you can see the rods and pieces of cement and in the car port room and in the third room and I don't qualify for a

bank loan and since I don't have resources to fix everything and I don't have money to fix everything and I'm scared with the pieces of cement when they fall on the floor and I have, and in the first room I don't have a problem and I sleep with them but I'm a widow and I don't have much money.

Thank you because I don't have another person to help me."

PRDOH Response: Information currently available regarding the Home Repair, Reconstruction, or Relocation Program and other CDBG-DR housing programs is available in the Action Plan.

Comment: #219_10-19-18_Mario Rodríguez Morales

"My question is: I lived 18 years in Luchetti. After Hurricane María my house was completely damaged up to 5 feet high by flooding inside. SBA approved a loan to buy a new house. We live in the new house. My question is: "If I qualify or what assistance there is for us who bought via SBA, but we're still transferring the mortgage from the damaged house and now we have another mortgage. What alternatives are there?"

PRDOH Response: Information currently available regarding housing assistance programs, including eligibility criteria, is available in the Action Plan.

Comment: #220_10-19-18_Roberto Gutiérrez Rodríguez

"Excellent initiative today, October 18, 2018. On behalf of a small community that belongs to the department of agriculture, but regrettably it hasn't been shown the importance it deserves to be able to perform with total integrity and that greatly helps our population and country, an experience that this initiative opens doors and facilitates the tools to be able to perform worthy and efficient work to benefit our country."

PRDOH Response: Thank you for your comments. Programs outlined in the Action Plan do not exclude any geographical area of Puerto Rico. Residents of the small community referenced may be eligible to receive assistance through one or more programs outlined in the plan. PRDOH is committed to leading an efficient, transparent recovery effort and looks forward to continuing collaboration with community leaders and other stakeholders.

Comment: #221_10-19-18_Ramón

"After November 18

- 1) How much time after November 18 will be needed to know the action plan to follow?*
- 2) Once the substantial amendment gets approved and a plan has been established, how much time to start with the vouchers, relocation, etc.?"*

PRDOH Response: It is estimated that HUD review and approve the substantial amendment to the Action Plan within 45 days of submission.

Comment: #222_10-19-18_Edna Sepúlveda Vargas

“We’re waiting for the decision of what you’re going to do for all the residents that live in the Luchetti area in Yauco. How long do we have to wait for the problem to be solved?”

PRDOH Response: Information currently available regarding housing assistance programs, including eligibility criteria, is available in the Action Plan. Programs outlined in the Action Plan do not exclude any geographical area of Puerto Rico. Residents of the Urbanization of Luchetti of Yauco may be eligible to receive assistance.

Comment: #223_10-19-18_José Roberto Pérez

“I congratulate you for the efforts you do in the Island. Because of my relationship with my residents and my experience of over 43 years doing appraisals in the Island, for banks, the government and the general public, many people have asked me and since I don’t have answers, here it goes.

- *If a person or family lives in a flood-prone area on 20/sept/2017 and sold the house, what happens if I buy?*
- *If the person didn’t sell, but moved to a house they bought after María, what rights do they have.*
- *It has been said that several urbanizations in the Island (ex. Luchetti in Yauco) are going to be demolished voluntarily, what happens with those who sold after María? With those who were renting? With the houses that were empty when María happened? When do you estimate we can start seeing results?*

There’s a lot of uncertainty and people and their families feel like sheep without a shepherd. It’s imperative to clarify what will happen with these cases and others not mentioned.”

PRDOH Response: Programs outlined in PRDOH’s Action Plan do not govern real estate transactions conducted on the island. Information currently available regarding housing assistance programs for homeowners and renters, including eligibility criteria, is available in the Action Plan.

Comment: #224_10-19-18_Keishla M. Rodríguez Santiago

“The house where I lived wasn’t mine, it was a loan from my father-in-law. I lost many personal items and I hope to see if you can help me with a house for my children and me. Where I’m living now is a house loaned it’s not mine, I don’t have my own home. I hope you can help. I’m living in...”

PRDOH Response: The Homebuyer Assistance program, outlined in the Action Plan provides eligible applicants with down payments and/or closing costs needed for the purchase of a home. Information currently available regarding this and other housing programs including eligibility criteria, is available in the Action Plan.

Comment: #225_10-19-18_Haydée I. Santiago Rivera

“I was living in a house mi sister lent me. Hurricane María blew away the roof. I lost everything and I registers for assistance but it was denied because I’m not the owner of the property. The owner is my sister who is in Massachusetts and doesn’t want to register for assistance because what was inside (my things) wasn’t hers. This is why I lost everything. I’m currently living with my 90-year-old mother in my sister-in-law’s house.

I would like to know if you can help me get a house to place my mother.”

PRDOH Response: The Homebuyer Assistance program, outlined in the Action Plan provides eligible applicants with down payments and/or closing costs needed for the purchase of a home. Information currently available regarding this and other housing programs including eligibility criteria, is available in the Action Plan.

Comment: #226_10-19-18_Susana Duprey Franco

“Sadly my house suffered a lot of damage – I’m a widow and I don’t have help. I also have health conditions. Through here I’m telling you also that my financial aid is social security but I don’t have much. I believe that God and you can help me – thank you sincerely”

PRDOH Response: Information currently available regarding the Home Repair, Reconstruction, or Relocation Program and other CDBG-DR housing programs is available in the Action Plan.

Comment: #227_10-19-18_Carmen Roldán Roldán

“I’m requesting help to be able to relocate my home where I can’t live because it was damaged by Hurricane María since September 20, 2018 [sic]. I had to abandon my house because I live in a flood zone and the storm surge and the hurricane winds weakened my home and the land was moving so it’s not safe to live there. I ask kindly if you can relocate me somewhere safe for my son who has an autism condition and I have health issues. My house is located at... My mailing address is...”

PRDOH Response: Voluntary relocation assistance is available through the Home Repair, Relocation, or Reconstruction program. Information currently available regarding this and other CDBG-DR housing programs is available in the Action Plan.

Comment: #228_10-19-18_Lisher Cintrón

“As a citizen and knowledgeable of federal programs, awards and compliance, I propose Municipalities are considered so they manage and implement the projects considered in the Plan approved by HUD.

Municipalities have proven their management and fiscal responsibility with CDBG funds. They know the specific needs of their communities and ensure the completion of each project done.

We will continue raising our voice so this request is approved. Municipalities collaborate with non-profit organizations as a multi-sector entity and coordinated, in common to comply with the CDBG-DR program standards and expectations. The Municipalities will comply with all the requirements as determined by the Department of Housing that will be responsible for monitoring and managing the funds. But it should be the one to execute the projects, this has been shown, if done by the Municipalities, this program will be exemplary and the results will be positive for all PR communities and population.”

PRDOH Response: PRDOH understands the expertise municipios have concerning the needs of local communities and as such, values the participation of all municipios and looks forward to a working relationship at the municipal level throughout the life of the grant.

Comment: #229_10-19-18_Angel Luis Torres Berrios

“I, Angel L Torres Berrios, work in the PR Fire Department, my work phone is... and my personal phone is...

My concern is the damage to my house, and the land where my house is. It was damaged because of a landslide about 5’ from the structure of the house. It also affected my neighbor.

I also provided the municipality with a document.

I hope you can help me, since FEMA denied my assistance.”

PRDOH Response: Information currently available regarding the Home Repair, Reconstruction, or Relocation Program and other CDBG-DR housing programs is available in the Action Plan.

Ineligibility for assistance under other disaster recovery programs, such as FEMA, does not automatically disqualify residents from receiving assistance through programs outlined in the Action Plan. Residents who were denied assistance by FEMA may be eligible to receive assistance from PRDOH programs.

Comment: #230_10-19-18_Carolyn Vizcarrondo

“Interesting by the central government as the concern of the mayors and its new interests for their towns. Very interesting ideas and proposals”.

PRDOH Response: Thank you for your comment. PRDOH understands the expertise of mayors and municipios have concerning the needs of local communities and as such, values the participation of all municipios and looks forward to a working relationship at the municipal level throughout the life of the grant.

Comment: #231_10-19-18_William Castro Vega

“I’m most interested in the property title”.

The Title Clearance program outlines opportunities for homeowners to receive title clearance assistance. Currently available information regarding this program is outlined in the Action Plan.

Comment: #232_10-19-18_Rosa I. Santana Marcano

“After Hurricane María, the Department of the Family worked in all the communities and shelters together with the Department of Housing so we consider that we, as first responders, should be added in the incentives to solve the housing problems, home purchase, paying for existing housing, or buying a second home, and the second initiative to help have another source of income as a second job”.

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home. Assistance under this program is not limited to those employed in critical recovery sectors. Information about the program can be found in the Action Plan.

Comment: #233_10-19-18_Rosa M. Marcano Báez

“After Hurricane María, my house had irreparable damage and was destroyed. As time goes by, it gets more deteriorated. I applied to FEMA, and Tu Hogar Renace, for assistance in the rebuilding when they denied, in my case because of my income. I have evidence of the denial for each one. Right now I’m living with my daughter, since my house is uninhabitable.

There’s a wood pole in front of the house that during the hurricane that damaged the front part of the house structure when the strong winds hit. I went to PREPA and they asked for \$5,000, which I don’t have to remove it. This is why I’m asking the Department of Housing for help. Thank you”.

PRDOH Response: Ineligibility for assistance under other disaster recovery programs, such as FEMA, does not automatically disqualify residents from receiving assistance through programs outlined in the Action Plan. Residents who were denied assistance by FEMA may be eligible to receive assistance from PRDOH programs. Information regarding the Home Repair, Reconstruction or Relocation Program is outlined in the Action Plan.

Comment: #234_10-19-18_Michelle Rodríguez

“We submit presentation about the services from our organization, Niños de Nueva Esperanza. We’re also asking for consideration to ensure funds are assigned to community-based programs that want to improve the impacted communities with multidisciplinary services to the people in the community”.

PRDOH Response: PRDOH understands the expertise community-based organizations have concerning the needs of local communities and as such, values the participation of these

entities and looks forward to a working relationship at various levels throughout the life of the grant.

Comment: #235_10-19-18_Ana Baez Rivera

“My house had a landslide and structural cracks. We can’t access the property, it’s deserted and difficult”.

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #236_10-19-18_Anonymous 1

“First: Targeted to the structures that don’t serve a purpose.

Second: The town of Dorado, sewage water problems”.

PRDOH Response: These needs and projects have informed PRDOH during the development of the CDBG-DR programs outlined in the Action Plan.

Comment: #237_10-19-18_Jaime Colón Malavé

“I’m here to know if you can help us since FEMA’s assistance was not enough and we’re currently living without a roof, because rental assistance was over and we don’t have the money to cover the damages due to Hurricane María. We want you to visit our house so you see the conditions of the home, we want to have a good house to live in better conditions”.

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #238_10-19-18_Ana Z Rosa Padilla (Director of Federal Programs, Municipality of Hatillo)

“1. Higher municipality participation is recommended in the planning, use and management of CDBG and CDBG-DR funds. We know the management and regulations of these funds, we have many years of experience working with these funds. Municipalities have a deep understanding of the specific needs of their communities; the strengths and weaknesses of each sector and barrio.

2. We ask funds to be assigned to mitigate the increasing coastal erosion problem. For example: Gabion projects, Rip Rap, and others like dunes.

- -Paseo del Carmén (La Marina)
- -Urb. Mar Azul (Playa Maguí)
- -Centro Punta Maracayo Camping
- -Parque del Norte

These areas have been severely affected by storm surge and erosion. These areas are currently inaccessible.”

PRDOH Response: PRDOH understands the expertise municipios have concerning the needs of local communities and as such, values the participation of all municipios and looks forward to a working relationship at the municipal level throughout the life of the grant.

Municipal projects may be eligible for assistance under the City Revitalization Program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors. Depending on the need, other programs may also be applicable to supporting community recovery. Currently available information regarding these programs is outlined in the Action Plan. Interested parties should monitor www.cdbg-dr.pr.gov for information regarding project eligibility as it becomes available.

Comment: #239_10-19-18_Glenda Serrano

“My name is Glenda Serrano – I’m the Director of Federal Programs and I represent Mayor Jose. A. Gereal.

We present houses that in the process of this year during the process, many houses have improved.

We had an impact with the Corps of Engineers. 700 tarps where 30% still has the same tarp installed after 1 year.

Our Municipality has financial limitations that are not enough to satisfy all the needs.

- 1. The main need is to rehabilitate damaged houses.*
- 2. Attack the flooding area that overflows the area and reaches other sectors. People have to be relocated.*
- 3. Extended rental assistance because they haven’t been able to complete the elevation of six properties.”*

PRDOH Response: These unmet needs and proposed activities have informed PRDOH during the development of the Home Repair, Reconstruction or Relocation Program. Currently available information regarding voluntary relocation assistance through this program is outlined in the Action Plan. The Rental Assistance Program may also be applicable for individuals meeting eligibility requirements, and this program is also outlined in the Action Plan.

Comment: #240_10-21-18_Modesta Irizarry (Líder Comunitaria en Loíza)

“In my speech during today’s hearings in Fajardo, I narrated all the effort I had to make in order to make it to the hearing on time, traveling from Loíza to Fajardo in public transportation at almost 10:00 am, and then having spot #26, where I had to wait until 3:00pm for my turn, because Mayors had privileged speaking turns, and spoke for approximately 10 minutes, and some for 15, as was the case of the Mayor of Fajardo. I cannot stop myself from expressing my indignation and annoyance at this situation, which was not called for. The public was also being informed that they would have until Sunday to submit comments by email, making it seems as if it would not be valid to submit comments on the same day. The mayors and the organizations represented in the hearings, as well as Community Leaders, all have the same rights of representation. There should be no preferences of persons under any circumstances.

As regards this document of yours, and I quote: “Public hearings will be held in places with accessibility for people with disabilities and, inasmuch as possible, outside standard working hours. Interpretation services for English and Spanish, as well as sign language, will be available in the Public Hearings. Other reasonable adaptations will be made available upon request to assist people with disabilities at the Public Hearings. Requests for additional adaptations can be made using the contact methods described in the Persons with Disabilities section above.” Unfortunately, this did not happen. The building had 5 floors, and we had to walk up the stairs because the elevator was broken. I had to walk about 5 blocks because the public bus only reaches half the town and leaves passengers away from the Mayor’s Office. There was really no consideration whatsoever with people who, like myself, suffer from high blood pressure.

Citizen participation was very poor, because even though you promoted the event, there was no interest from the municipalities to encourage citizens to participate. I thought this was very sad, because they really seemed like hearings for mayors, like at the beginning, when there was no invitation to organizations or the communities to participate. Thanks to the efforts of Puerto Rico Legal Aid and Access to Justice we were able to postpone the dates and extend participation in the hearings. Every process should be clear, comprehensible, and citizens must have access to all the information related with them.”

PRDOH Response: Thank you for the feedback regarding the public hearing process. The public hearing process was open to the public and resulted in a wealth of information exchanged. Hundreds of submittals from the public were received. Although each proposal may not have been referred to by name in the Action Plan, all submittals have been reviewed carefully by PRDOH and were considered in the development of the plan. Notification of public hearings was advertised on social media, in the newspaper, and in circulated newsletters, in addition to being posted on the PRDOH website, www.cdbg-dr.pr.gov.

“Our recommendation:

1. While the amendments and distribution process are underway, whenever funds are available, the community should be made aware, and there should be citizen participation.

2. *Citizens should have access to a safe shelter and dignified, affordable housing, and to the resources available. The decision of who receives the resources should not be left to the discretion of the Department of Housing or the Mayors.*
3. *Right to receive access, and to obtain their property titles, which was one of the biggest limitations with FEMA. Even with the effort of a new form, people did not qualify, and Tu Hogar Renace, who have done a great job, did not correctly make up for it either. We still have more than 200 families living in tents in Loiza.*
4. *We request meetings of the Regional Director of Housing with Community Leaders, organizations and citizens, so that they can see in detail what all available funds are to have dignified housing, and to avoid them saying later that the funds were lost because no one requested them.*
5. *On the municipal level, the projects submitted in the plan do not necessarily satisfy the true needs of the community, who are worried that their houses, roads, and communities are not in the best of conditions. The community has not been consulted about some of the housing projects that are going to be built. Some people's properties are going to be expropriated, or they will be displaced, a language that should not be used, according to Housing.*
6. *Tend to the need for lighting on main streets, as well as within the communities. This has caused an increase in violent acts in our town. Personally, I have been a victim of the constant shootings inside and behind our neighborhood due to problems between the town's gangs and nearby sectors (this is a cause of great worry). We have no quality of life like we deserve, and we do not deserve this.*
7. *Before expropriating or displacing, why don't you better use the housing that is considered as obstacles in order to repair them and make them accessible to the people who are looking for a home. Also, canalize the pipes or flood-prone sectors. Rights now, over 70% of the town floods in the places where they are going to canalize the waters, in a town where there is nearly no sewage system to keep making buildings. There are over 5 private housing projects in Loiza, and they did build the sewage system for those, but not for the adjacent communities. What are we talking about? I believe in progress, but not in abuse of power and discrimination.*
8. *Satisfy the urgent need for housing of single mothers and those who live with their partners and are living with their families in houses with 2 or 3 bedrooms. This encourages sexual abuse in many families.*
9. *Support the nonprofit organizations in their quest to help in the communities. It has been proven that they were the first to respond and help at the time of the hurricane.*
10. *Be fair in the distribution of funds. There should be transparency in order to avoid corruption, which has been so damaging in different four-year terms.*
11. *In project development there is a ranch in Las Cuevas Barrio – Vistas de Loiza that needs to obtain electricity and water services in order to be complete and get the government's approval.*
12. *People in the Sectors of Villas de Colobo, Miñi Miñe, Parcelas Suarez, Villa Santo, Villa Cristiana and Las Carreras need a lot of help with housing and the restoration of their areas, due to problems with used waters. Their areas are prone to flooding, and they need to improve their*

quality of life. Taking into account that the first option is no expropriation or displacement. Right now, most of those people have no knowledge about the construction projects that are being planned for their areas. This is why town talks are so important.

13. Funds for dignified public transportation, which does not exist at the moment, and is very limited, as I expressed at the beginning. I had to use three means of public transport in order to reach the hearings.

14. Improvement of our health services at the Emergency Room, which does not have a good gurney for people who weigh over 300 pounds, wheelchairs for these obese people, an EKG machine with Monitor, which does not exist. I have had to go to the Hospital in Carolina to get attention, because every time I go with my high blood pressure, this equipment does not exist.

15. Collaboration of the Agriculture Department with the cattle owners who do not have their animals identified, and there is no one to bring claims to in case of accident, as has happened with the ranches located in highway 187 of San Isidro de Canovanas to Loiza. The Public Transportation Department should identify these areas as cattle zones, since they are constantly invading public roads and causing many accidents to the residents who use these routes.

16. Serious guidance to the residents of Villa Hugo and Valle Hill, who were severely affected in this flooding area, and most of whom did not qualify for help from FEMA or Tu Hogar Renace. The ironic part is some people who were in the same conditions did receive help.”

PRDOH Response: Thank you for the thorough commentary. The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. All relocation contemplated in the Action Plan is voluntary.

PRDOH agrees that planning works best when it is community driven and involves Municipalities and non-profit or community groups. PRDOH has designed programs such as the Whole Community Resilience Planning with those considerations in mind.

Infrastructure projects may be eligible for assistance under the FEMA Coordination, Critical Infrastructure Resilience, or City Revitalization programs.

The Housing Counseling program aims to provide wrap-around educational services to residents of Puerto Rico. None of the programs outlined in the Action Plan are geographically restricted within Puerto Rico. Residents in the communities mentioned in the comment may be eligible to receive assistance.

Comment: #241_10-21-18_Nirvana González Rosa (Movimiento Amplio de Mujeres de P.R.)

Summary: The document submitted describes Movimiento Amplio de Mujeres de PR as a non-profit, feminist group working towards gender equality for men and women in Puerto Rico and offers the following specific comment on the Action Plan:

“...Our initial comment is to highlight the extraordinary role that women played after the Hurricane Maria passed. Women, particularly those who live in the poorest communities, had a drastic impact in achieving the survival of families through the conditions in which their homes were left, the isolation of their communities, the scarcity of food, the difficulties in getting access to health services amidst the chaos, and the prolonged absence of crucial services, such as electric energy and water. Having showed their strength, initiative, and solidarity, it would be fitting that they were taken into account in the government’s plans for reconstruction. However, the lack of effort to incorporate women into the preparation of the Plan is notorious. Also, no spaces have been opened for NGOs –women’s NGOs- who took the initiative in supporting the most vulnerable sectors as soon as Maria had passed. We must also call attention to the dramatic impact of Hurricane Maria in the impoverishment of these women in Puerto Rico.

We have reviewed the above mentioned Plan and the Substantial Amendment, which are intended to focus particularly on the urgent need of housing and socio-economic matters. Based on that review, we find that there are no proposals regarding the attention to the urgent housing and socio-economic needs of the women living in poverty. Sadly, this exclusion reflects the governmental environment in Puerto Rico, where there is no adequate knowledge of the living conditions of a significant percentage of women in our country. It is well known, according to the data estimated by the 2016 Community Survey for PR of the Negotiated Federal Census, that the poverty situation in the country affects women drastically, because they have a higher proportion than men in the percentage distribution of poverty levels. In 2016, 45.4% of women was living below the poverty level. On the other hand, according to the estimates of the Community Survey of the 2017 Census, 46% of homes are headed by women, and 67% of the homes headed by women, with minors under 18 years of age, are living below the poverty level. Only 38% of these heads of household have jobs, while 50% are outside the workforce. It is essential that the needs of this demographic group be taken into account in the design of a plan for the use of funds.

However, neither the Substantial Amendment nor the Plan include measures that tend to the needs of this population of women in general terms, allowing the women who are outside the workforce and those who are unemployed to become a part of that growth. In order for the Plan and the Substantial Amendment to have a real economic effect of growth and social transformation, the Housing Department must study and incorporate the situation of women as an especially vulnerable demographic group. Given this Plan and Substantial Amendment, now is the time when the Department is faced with the opportunity to give concrete attention to this marginal and poverty situation of thousands of women and their children. Failure to do so would constitute an irresponsible use of these funds, which are precisely directed towards promoting and investing in the development of our social capital. Women are an essential part of that social capital, and their inclusion would lead to economic development that will help reduce inequality, and achieve real social transformation.

An authentic participatory planning process for the communities is urgent, and must incorporate a deep assessment of the needs of communities and their most vulnerable populations. Evidently, if we want to achieve development and economic revitalization in Puerto Rico, is it required that women –who represented one of the most marginalized sectors of the productive process- integrate to it. In light of all these facts, we recommend that, since women are the single largest

population group, specific strategies should be designed, based in gender equality, to include the following matters:

- economic development for those women who are outside the workforce, and the unemployed,*
- training and skill-building plans for women who are heads of household, in order to allow for their inclusion in the workforce,*
- grants for the payment of care for children, the elderly, and people with needs due to health situations,*
- in the same communities, centers for the care of children, the elderly, and people with health situations that require continued attention, so that they may help women in their process of insertion to the work market, and allow them to become a source of employment as well, or a source of self-income through small business,*
- the use of these funds primarily for providing safe housing to families, particularly those who are headed by women.*

Finally, we want to express the following claims.

1. Our claim so that the “analysis of unsatisfied needs” immediately incorporates the needs of women who, despite being the majority of the country, are still excluded, since these needs have not been proportionately taken into account with the priority required by their exclusion from the work market. This particularly in light of 83 FR 403-14, which extended the use of funds beyond housing to include economic recovery. It is essential that women are included, because statistics clearly indicate that there are more women than men living in poverty.

2. Since there is a recommendation for the creation of a Task Force to be composed by representatives of several sectors, including non-governmental organizations, we request our inclusion, so that we can advocate for the specific interests of women, particularly those who are living and poverty and marginal situations.

3. In order to guarantee transparency and accountability, we request that the Department of Housing keep us informed about the notification processes of the Citizens’ Participation Plan, the publication of which is mandatory. As MAMPR, we are interested in contributing and analyzing the needs of women in Puerto Rico.”

PRDOH Response: PRDOH agrees that planning works best when it is community driven and involves Municipalities and non-profit or community groups. PRDOH has designed programs such as the Whole Community Resilience Planning with those considerations in mind.

Thank you for your comments regarding inclusion of women. Program implementation will be conducted in a manner which will not cause discrimination on the basis of race, color, religion, sex, disability, familial status, or national origin.

PRDOH values collaboration with non-profit entities and looks forward to a continued positive working relationship with them throughout the life of the grant.

Comment: #242_10-21-18_Luis Rolan Maldonado (Municipio de Ciales)

“The community known as Sector Isolino Ortiz, on Calle Morovis, was severely affected by the flooding that ensued after the passing of Hurricane Maria through our island. Therefore, it would be important to include it in the Relocation Program of the CDBG Funds. These families lost everything, and the river level topped their houses. It is a small community whose properties could be valued very well in order to pay them, or build them another house in a non-flooding area.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Programs outlined in the Action Plan are not geographically restricted within Puerto Rico. Residents of the Isolino Ortiz Sector may be eligible to receive assistance.

Comment: #243_10-21-18_Irm M. Pagan Villegas (Municipio de Culebra)

Summary: The document submitted offers geographical information about the island of Culebra in the Autonomous Municipality of Culebra (MAC), provides demographic information about the municipality and emphasizes the need for energy efficient, accessible housing on the Island of Culebra. The document specifically highlights the following project proposals, founded in basic public policy, as quoted below:

“Basic public policy elements for the development of housing:

- 1. Protection of the existing natural elements*
- 2. Consideration of the Federal Laws of the Federal Aviation Administration (FAA), regarding proposed projects in airport zones or areas.*
- 3. Building design should include the use of renewable energy infrastructure in the buildings.*
- 4. Projects that use the maximum amount of land should be considered, therefore we*
- 5. recommend the use of cluster buildings.*
- 6. The entire electrical system needs to be ground, in accordance with the*
- 7. Promote the protection of existing natural elements.*
- 8. Building design should include the use of renewable energy infrastructure in the buildings.*

For these purposes, we propose the development of the following projects: Project Quantity Estimated Cost Development of residential units 100 units \$17,000,000.00 Development of cluster housing 100 units \$20,000,000.00 Economic development. The intrinsic assets of the Municipality of Culebra with respect to their resources and natural area or high ecological value, as also their biggest challenge with respect to economic development. It is a policy of the MAC that every project adjusts to the natural environment of the Municipal Island. Culebra is a world-known

tourist destination. Due to the arid nature of the Island, there is no water run-off, such as rivers or ravines, so as a result its waters are pristine around the archipelago. Culebra has many beautiful beaches, including the world famous Flamenco Beach.

Additionally, the Island of Culebra is located about 24 miles away from Puerto Rico, about 14 miles away from Vieques, and about 25 miles away from Saint Thomas. Our strategic location captivates the nautical tourism that navigates to the islands of the Caribbean. In order to create a proper and environment, dependent on the tourism industry, we need to focus our efforts in providing eco-friendly facilities which are inexpensive and are supported by additional amenities and adequate infrastructure. The public domain lands that run through the sea coastline in the internal basin, called Ensenada Honda, should become promenades for pedestrians and docks for visiting boats or small vessels. In accordance with the above, the MAC is planning the development or culmination of the following projects: Project Estimated Cost Development of the Dewey Sector Shopping Mall \$1,500,000.00 Promenade and docks El Batey \$150,000.00 Romero Walkway to the Coral dock \$75,000.00 Development of commercial facilities and promenade at the Port Front \$300,000.00 La Pica Promenade, Ramp and Dock \$750,000.00 Development of commercial facilities in channel dock La Lobina \$250,000.00 Anchorage buoy system in Ensenada Honda \$4,000,000.00”

PRDOH Response: Housing programs outlined in the Action Plan are not geographically restricted within Puerto Rico. Residents of Culebra may be eligible to receive assistance.

Municipal projects, like some of those listed here, may be eligible for assistance under the City Revitalization program, which establishes a fund for Municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #244_10-21-18_Marcelo Trujillo-Panisse (Municipio de Humacao)

Summary: The municipality of Humacao submitted a document which recounts the devastation of Hurricanes Irma and Maria in Humacao, and highlights a project proposal for rehabilitation of the Punta Santiago Pier and Villa. The proposal highlights that the community of Punta Santiago was particularly devastated by Hurricane Maria, and notes that 95% of the residents in the community are awaiting housing rehabilitation, which the municipality proposed during public hearings in March 2018. Information specifically related to the proposal for the pier is quoted below.

“...In addition to the housing crisis, Punta Santiago is experimenting a second problem, which is also larger, related with the economic stagnation of most of the area’s commercial sectors. Punta Santiago is a coast area which has traditionally sustained itself through fishery, not just for local fishers, who have organized in a Fishermen’s Association for many years, but also for businesses (restaurants, kiosks, fish stores and supermarkets) which feed from this fishing activity to generate their own economic activities.

The Punta Santiago Dock, which is the starting point for the nearly 15 fishermen who used to head out in their boats to do the fishing that not only sustained their families, but also the above

described economic activity, was completely destroyed, as were the boats, the fishing villa where the fish were sold to businesses and families on the coast, the fish market managed by the Fishermen's Association, and the nearby kiosks.

Along with this blow to the economy produced by the lack of means to fish, which is so vital for these sectors, is the terrible impact caused to the tourism of Punta Santiago, since the most attractive feature of the area are its restaurants, seafood kiosks, the recreational fishing dock, the cultural and sports (boating competitions) events, and town parties which are customarily celebrated in the docks. Unemployment has affected not only the fishermen, but also all the segments deriving their income from fishing activities.

For this reason, the Humacao Municipality respectfully requests the state Housing Department an allocation of \$7 million dollars in order to carry out rehabilitation work on the Punta Santiago dock, and the facilities used by the Fishermen's Association in the fishing villa, including a fish store, a cafeteria, and the boating area. Rehabilitation work for the Dock is estimated at \$4 to \$6 million, and will require a series of permits from the agencies concerned with this activity. The Municipality has done studies to determine the requirements for the completion of this work.

In addition, there have been meetings with the Fishermen's Association in order to identify exactly what are their priority needs, and determine specifically what this project must provide so that they can restart their fishing activities and start moving the economic development of the area, on which so many sectors depend. Among these is the rehabilitation of the structures of the fishing villa, replacement of boats and motors, fishing and communication equipment, refrigerators to keep the fish, etc."

PRDOH Response: Large transformative projects which create jobs and/or cascading economic impacts may be eligible for funding under the Economic Investment Portfolio for Growth program. Currently available information regarding this program is available in the Action Plan.

Comment: #245_10-21-18_Alfredo Alejandro Carrión (Municipio de Juncos)

Summary: Comments submitted by the Municipio of Juncos include Project proposals in the areas of housing, economic development, and infrastructure. The proposal includes location, estimated cost, and estimated duration of each proposed project.

Housing programs proposed:

- *Construction of new housing in the Hormiga Sector; Gurabo Abajo Barrio*
- *Creation of the Del Valenciano Egida*
- *Rehabilitation of the Graciani building to provide housing options for those who lost homes in the Hurricanes*
- *Construct transitional housing for those struggling with addiction, and domestic violence survivors*
- *Rehabilitation of abandoned homes*

- *Acquisition of a public nuisance building to construct multi-family housing*
- *Acquisition and rehabilitation of the Mueblerias Mendoza building*

Economic Development:

- *Construction of the Valenciano Hotel*

Infrastructure:

- *Repavement of streets and walkways*
- *Improvements to pluvial systems*
- *Creation of a municipal safety and emergency response center and shelter*
- *Highway diversion project to reduce traffic congestion*

PRDOH Response: Housing programs outlined in the Action Plan are not geographically restricted within Puerto Rico. Residents of Juncos may be eligible to receive assistance.

Municipal projects, like some of those listed here, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #246_10-21-18_ Héctor L. Rosado Calderón (Municipio de Morovis)

“As I mentioned in the Public Hearings of October 16th, 2018, in Fajardo, we have amended our presentation to add three (3) more projects.

- 1. An Auspice for the elderly, this project will cost \$20,000,000*
- 2. A Dialysis Center, this project will cost \$5,000,000*
- 3. Unitary Transportation Program, this project will cost \$6,000,000*

Finally, thank you for giving us the opportunity to present all the needs of our town of Morovis. The municipalities have demonstrated an administrative capacity to manage these CDBG-DR funds, since we have a proven administrative level in the efficient management of federal funds.”

PRDOH Response: The Social Interest Housing program aims to provide dignified, resilient housing to vulnerable populations, including the elderly.

Municipal projects, like some of those listed here, may be eligible for assistance under the City Revitalization program, which establishes a fund for Municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #247_10-21-18_ Ángel B. González Damudt (Municipio de Río Grande)



Summary: Comments submitted by the Municipality of Juncos include Project proposals in the areas of housing, economic development, and infrastructure. The proposal includes a description of the national objective met by each proposed project and a description of the unmet needs the project attends to, and estimated cost for the project.

Housing:

- *Relocation of communities*
- *Construction of new housing*
- *Acquisition and rehabilitation of unoccupied housing units*
- *Creation of urban multi-family housing development*
- *Rehabilitation of housing*
- *Down payment and closing cost assistance*
- *Resilience installations in rural areas under the Community Energy and Water Resilience Installations program*

Infrastructure:

- *Municipal shelters*
- *Reconstruction of a bridge in the Galateo Sector, Jiménez Barrio*
- *Resilience in Urban Center*
- *Revitalization of electrical systems*

Economic Development:

- *Develop a port in the Villa Pesquera area*

Planning:

- *Integrated and general planning for community resilience*

In addition, the projects proposed, the submission includes the following quoted specific commentary regarding the Action Plan:

“We are submitting our proposals again so that they can be assessed and funds are allocated. However, in light on new activity, we have a few comments that we would like to share with you:

Whole Community Resilience Planning: we are currently in the phase of talking to the communities, making censuses to collect data about the population, and promoting the creation of Neighbor’s Councils. This initiative is geared towards developing community resilience. We are offering workshops to community leaders so that they can become the primary responders in their communities. In this connection, we can say that the reimbursement of \$20,000 proposed by the municipality seems small and limiting, since it is a reimbursement. The municipalities are tending to daily situations with diminishing funds. We are requesting an increase of this allocation.

Municipal Planning: We are very interested in having access to funds in order to make comprehensive community development plans; functional plans for housing/use of

lands/economic development; disaster mitigation or resilience plans; recovery plans; among others. We think this is an excellent opportunity to get funding for these plans that are so necessary. The municipalities are juggling with our allocated budgets in order to satisfy all the needs we have identified.”

PRDOH Response: PRDOH agrees that planning works best when it is community driven and involves municipalities and non-profit or community groups. PRDOH has designed programs such as the Whole Community Resilience Planning with those considerations in mind.

“Housing: In this area we realize that the administrative agency for most of the proposed activities is the State Housing Department. The description indicates that this will be direct to the citizens. In this connection, we have a concern about the citizen’s request process in different activities. In the case of our locals, most are elderly people, people with transportation problems, among other limitations. Is the agency considering delegating one or more of these activities to the Municipal authorities? I can guarantee that we have the best disposition to collaborate with you so that these activities will be accessible all the citizens who need them. The object of these activities is to provide alternatives to our citizens, so that they can be more resilient in the face of any atmospheric event. But we must consider expediting these activities and making them more accessible in order to guarantee that everyone has the same opportunity to access the funds.

An example of what we are explaining here is the situation of the residents of the Estancias del Sol community. These residents and the Municipality are interested in taking care of the matter of title over those lands. The Municipality knows the needs of its citizens, and it is the agency called upon to tend to them. Therefore, I emphasize that these funds should be delegated to the municipalities, which will allow us to take care of the situation in a more agile and efficient manner.”

PRDOH Response: PRDOH understands that Municipalities are acutely aware of the needs of their residents and as such, PRDOH looks forward to collaboration with Municipalities throughout the life of the grant.

“Infrastructure: The Critical Infrastructure Resilience Program is one of the programs for which we have submitted a new activity, even though FEMA is going to grant funds to make reparations on infrastructure, we must recognize that these funds do not strengthen the Municipality of Rio Grande. Therefore, this activity will allow us to develop projects that will position the city in a resilient posture in the face of any other atmospheric event.

In this connection, we are submitting a project to rehabilitate the electrical system in several communities. The improvements made were to reactivate the electric energy service, but we have communities where the service is intermittent, and they are facing problems due to the fluctuating voltage. We also have one community that still does not have electric energy.

Infrastructure: Community Resilience Centers: We will be submitting a proposal for the creation of said centers in our municipality.

Multi-sector Initiatives: City Revitalization Program: we submitted several projects under this category.

The reconstruction of the Bridge in the Galateo Sector of the Jimenez Barrio and the reconstruction of the urban center.

We also request the inclusion of work to finish the sewage system in the La Dolores-La Ponderosa Community. Also, the installation of this system in the communities of Villa Realidad and Montebello.

We request the construction of water reservoir tanks for all the communities in the high part of our town. These communities face water supply problems because the system works with an electrical water bomb. We propose these water tanks so that the water can go down by gravity, in order to make these sectors resilient when the electricity service is interrupted.

Again we are thankful for the opportunity and trust that under this new stage we will be included to receive funding for the development of the projects that we have submitted, which are vital for the recovery of the El Yunque City.”

PRDOH Response: Thank you for your comment. More information, including how to apply, will be include in program guidelines, which will be published to www.cdbg-dr.pr.gov, after HUD approves the programs.

Comment: #248_10-21-18_Pedro González (Municipio de San Lorenzo)

Summary: The document submitted reiterates Project proposals previously submitted to PRDOH from the Municipality of San Lorenzo and offers the following quoted commentary specifically about the Action Plan.

“Firstly, the Plan Draft keeps the programs that had been included in the initial Plan, and adds eight (8) additional programs, of which only one –the Critical Infrastructure Resilience program– is exclusively aimed towards the municipalities as subrecipients. That is, of the 28 programs included in the Plan, which represent \$9,723 million, only \$700 million would be guaranteed for the execution of activities and projects. This represents only 7.1% of the total funds allocated to date by the Federal Government. On the other hand, of the total number of programs included in the Draft Substantial Amendment to the CDBG-DR Action Plan, municipalities are eligible to participate in less than half of the programs (only 9 programs) for which the State Housing Department recommends that municipalities should compete with other state agencies, quasi-governmental agencies, businesses, non-profit organizations, among others. This situation is still more critical if we consider what, to date, the Guideline schedules for submitting proposals have not been published.”

PRDOH Response: PRDOH values collaboration with Municipalities and looks forward to a continued positive working relationship with Municipalities for the life of the grant. More information regarding programs referenced in this comment, including how to apply, will be published at www.cdbg-dr.pr.gov, after programs are approved by HUD.

“Secondly, the Plan proposes ten (10) programs geared towards housing, which is one of the most important programmatic areas for the recovery of our families and citizens who were affected by the disasters. Of these 10 programs, municipalities cannot compete to execute any projects

directly. The proposed Action Plan excludes municipal governments as subrecipients for 100% of the funds allocated for housing. This distribution method only allows for the participation of the OSFL, state agencies, businesses, among other participants. This is cause for great concern, because many projects proposed by most municipalities are small and medium scale and aimed to provide housing for affected families and citizens. Historically, municipalities have worked with much more agility than state agencies or other entities.

As an example, the typical project for the acquisition and demolition of downtown buildings classified as public nuisances in order to build less than 20 houses should not be managed under a centralized model by a state agency in San Juan or other entities. We do not object to other groups or organizations with a historically proven capacity to participate in the execution of housing projects, but completely excluding municipalities from this program area is not acceptable. The governmental institutional history of Puerto Rico, under every Administration, points to the fact that this centralized model substantially delays progress, and the culmination of small and medium scale projects, substantially affecting the families and citizens that we seek to help due to the disasters occurred over one year ago.

This is even more crucial if we consider that the CDBG-DR program is designed by Federal Law to be managed by reimbursement, and the economic capacity of other entities might endanger the execution of the projects. To that effect, we request that the Department of Housing reconsider in order to correct this aspect of the Plan, so that municipalities can be added or included in the method of distribution as subrecipients, in order to execute housing activities and programs. Collaboration between the State Department of Housing and municipalities will be more effective when assessing results in short time periods, and within the strict rules of time expenditure imposed by the federal government.

Thirdly, it is important to note that, if we look at the history of the development of the funds from the Community Development Block Grant, and the CDBG-Disaster Recovery, funds have been assigned for execution mainly to municipalities in Puerto Rico, and to decentralized governments in the USA, such as cities and counties. The federal statute designates these as Units of General Local Government (UGLG). The proposed Plan does not follow this norm, and relegates municipalities to a secondary role, with the exception of the funds allocated to the areas indicated above. We find it strange that this model –which has been successful- should be changed. If we look at the Action Plans for the states of Texas and Florida, those jurisdictions kept the decentralized model, where the cities and counties are the main agents of recovery. The effective response of municipalities after hurricanes Irma and Maria should not be taken lightly. It was crucial for giving attention to the pressing basic needs of our communities to save lives. Municipalities have the ministerial duty to assist their residents equally, and they are the closest to the community, and have a close knowledge of the needs of our vulnerable populations. Non-profit organizations and other governmental agencies are important collaborators, but they do not substitute the legal responsibility of the municipality, through its mayor (and his structure), as the democratically elected official of the citizens of his or her municipality. In line with this recommendation that municipalities should be able to execute the activities and programs of the CDBG-DR, they should also have access to the use of funds for administrative purposes. In accordance with the Federal Register, page 5585^[1], 5% of the allocation, plus the income of the program, can be used for administrative costs by the grantee, municipalities or other

subrecipients. Therefore, we recommend that the Plan expressly delegate administrative funds to the municipalities.”

PRDOH Response: Thank you for your comment. PRDOH values municipal collaboration and has taken this into consideration.

The municipality of San Lorenzo proposed the following projects. Project descriptions in the original submission include estimated cost and duration of each proposed project.

- *Creation of an emergency operations center*
- *Construction of a municipal cinemas*
- *Acquisition and construction of 22 homes*
- *Repavement of streets*
- *Acquisition, demolition, and relocation of homes located in the La Marina Sector*

PRDOH Response: Municipal projects, like some of those listed here, may be eligible for assistance under the City Revitalization program, which establishes a fund for Municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #249_10-21-18_ Bernardo “Betito” Márquez (Municipio de Toa Baja)

Summary: The document received highlights the impacts of Hurricanes Irma and Maria on the Municipality of Toa Baja and provides an account of immediate response activities undertaken in the Municipality and an estimate of remaining unmet needs. Additionally, the document includes the following quoted commentary on alignment of projects proposed by the municipality and programs outlined in the Action Plan.

“1. Program for the Rehabilitation of Abandoned Homes – The program consists of using properties previously identified as public nuisances, rehabilitating them in a resilient manner, and making them available to families who have lost their homes due to hurricane Maria, or whose homes are located in a high risk area. This program is in accordance with Social Interest Housing program, the Single-family Repair and Reconstruction program, and the Multifamily Reconstruction, Repair and Resilience program presented in the Housing Category of the Plan.

2. New resilient residence – We propose the construction of new modular housing, which can be created in stages, in order to accommodate low-income families who were affected and have not received the necessary help. These structures will adapt to the new construction codes, as well as the principles of resilience, “Energy Star”, “LEED”, and “Green Building”. It will be executed through processes of community participation, where participants are presented with the construction design principle. This program is part of the Home Repair, Reconstruction or Relocation program, or the Assistance to Mortgage Buyers program, within the Housing Category, as presented in the Plan.

3. Closing costs and Mortgage Escrow – This project makes the allocation of funds to cover 100% of the escrow and/or closing costs viable in the acquisition of a first home, prioritizing families

who were displaced by the disasters. Our Municipality will establish the parameters of accessibility, using as basis the same parameters of the NSP “Neighborhood Stabilization Program”, which we operate, and for the management of which we have received praise. The help will allow for the reduction of the mortgage payments to something that is affordable for families, and guarantees its possession. This initiative is paired with the Home Buyers’ Assistance Program included in the Plan under the Housing Category.

4. *Auspice schools program* – This program consists of reusing the schools of the Department of Education which are currently not in use. The structures will be enabled for use as care and auspice centers for low-income aging people, or people with special conditions. During the emergency caused by hurricane Maria, the population of people over 65 years old was one of the most affected, due to their limitations of movement, purchase power, and general independence. This program is designed within the Housing Category, under the Social Interest Housing program.

5. *Generation transfer* - This project seeks the exchange or swap of homes between families. We have seen how aging people are left alone with large house of 3 or 4 bedrooms, where they raised their children, and which they cannot sustain anymore. With this project, we seek to acquire those houses that are in possession of the aging population, and transfer them, either by sale or rent, to families who do not have a home or need a bigger one, while the elder person will be provided with a home that has the size and characteristics that are appropriate to their living conditions. Priority would be given to the families affected by the disasters and to vulnerable populations. This initiative is in harmony with the Social Interest Housing program, and the Rental Assistance Program, under the Housing Category.

6. *Program for rehabilitation of the town of Palo Seco and its Historical Center* – This project will rehabilitate these areas with commercial and residential potential, which are currently socioeconomically depressed areas, and were also affected by the disasters. The investment on infrastructure in these areas will be conditioned by a combination of housing, rent, and commerce. This program is eligible under the Strategic Projects and Commercial Redevelopment program, within the Economy Category, and under the City Revitalization program, within the Multi-Sector Category. Undoubtedly, jointly with other projects that are already underway, this will be the most important economic development project for the Toa Baja Municipality since its foundation.

7. *Schools and Community Shelter Program* – This program consists of reusing the schools that have been closed by the Department of Education, which used to be shelters. The structures will be enabled to be used as arts schools, professional training facilities, and community centers. At the same time, spaces will be enabled so that the school can be used as a shelter in case of hurricanes, earthquakes, tsunamis, or other emergencies. Additionally, we will equip the eating hall and kitchen, the bathroom areas with showers, a drinking water cistern tank, and power generator. This program follows the policies established for the Community Resilience Centers within the Infrastructure Category.

With the new allocation of funds, and the expansion of the programs and categories, we have identified some projects and strategies that we need to implement in order to strengthen the recovery of our town.

Under the category of infrastructure, we believe that cleaning the pluvial waters distribution system is a priority for the prevention of flooding. The legal regime designates municipalities as the authorities responsible for the management and maintenance of pluvial waters. However, no funds, equipment, technical assistance are allocated, nor the location and direction of the pipes. Many of these were built over 50 years ago, and they need urgent maintenance. From the analysis of the professionals and experts who are assisting us, it is evident that the clogged pipes had an essential role in the flooding of many sectors. This activity is congruent with the Critical Infrastructure Resilience program, under the Infrastructure Category.

Our administration has designed a Plan to reuse over 200 acres of agricultural lands in the first stage, which we are sure is in accordance with the Re-grow PR, Urban and Rural Agriculture program, under the Economy Category.

On the other hand, in order to achieve the best results in the development of projects, especially those which tend to the needs of the communities, we need citizen participation. In Toa Baja, we have adopted this as one of the pillars of our administration, and the results have been extraordinary. Since we arrived at the Mayor's Office, we created the Municipal Institute for Cooperative Movement and Citizen Participation, with the purpose of organizing and enabling communities to achieve a level of self-management that will allow them to participate in the decisions about their own communities. To date, we have been able to execute several initiatives with the communities, to their own benefit. We understand that the integration of our Institute and our Communities to the Multi-Sector Category is pertinent in the projects eligible under the City Revitalization Program, and other re-development and community transformation projects.

The strategies and projects submitted have a total preliminary cost of \$210 million, which will allow Toa Baja to revitalize, and its citizens to have a better quality of life, with safe and resilient housing. During the previous public hearing, we asked to receive these funds as direct recipients, because we understand that municipalities have been "grantees" for a long time, and we have the experience needed to execute the work. However, we understand the policy for the management of funds established by Federal Housing. Notwithstanding, and due to the fact the the Department of Housing has a short period of time to execute thousands of projects, we believe that the most appropriate course of action is for municipalities to serve as subrecipients for the execution of several programs or projects.

As widely demonstrated during the emergency, due to their closeness to their constituency, local governments are more agile and efficient in the rendering of services for the people. Faced with the urgency for the use of these funds, and in recognition of the fact that we have the administrative competence, we promote the Autonomous Municipality of Toa Baja as subrecipient for the management of funds for the project to be executed in our territory. The municipality of Toa Baja has been a CDBG Grantee for the past 40 years, and we have ample experience in the management of cases and projects. This is why we are interested in having the state use our knowledge in order to maximize the resources that are being assigned to the Island today.

I thank the presidential table for the opportunity conferred to me to express the feeling of my people. I recognize that the Honorable Governor and the Resident Commissioner are interested in having the Municipalities work in coordination with the Department of Housing in the

reconstruction of a better Puerto Rico; and having municipalities such as the one I represent receive funds in proportion of the damages suffered. In this connection, we emphasize again that the original HUD list should be used, where there were estimates of unsatisfied needs and an allocation of \$175 million or 13,9% of the total of \$1,257 million of the CDBG-DR funds were allocated to Toa Baja. If we apply that same proportion to the total CDBG-DR funds of \$9,728 million, Toa Baja should receive \$1,352 million, which is consonant with the damages estimated by HAZUS, used by FEMA. Lastly, both FEMA and HUD have determined that Toa Baja was the municipality that sustained the most damages due to the hurricanes. This is why we will be ensuring that we receive the programs and projects for each Category, according to this reality.

Section six (6) of the communication published in the Federal Register requires that our comments be taken into consideration and included in the plan, as well as an answer in writing about the State's position with respect to said comments. As an elected official, I have managed the CDBG program with an equitable distribution of the funds, among the areas of greater need, and where the citizens want them. We expect nothing different at this time from the state. As a Toabajan, I request that the CDBG-DR funds be allocated to Toa Baja as subrecipient. We have the capacity to manage them, the trained human resources expert in the area, but most of all we have the commitment to serve our people and make our vision a reality. Toa Baja, a cooperative, solidary, democratic, fair, sustainable, inclusive, healthy, resilient, and transparent town."

PRDOH Response: Thank you for your comments. Programs outlined in the Action Plan are not geographically restricted within Puerto Rico. Residents of Toa Baja may be eligible to receive assistance.

Municipal projects, like some of those listed here, may be eligible for assistance under the City Revitalization program, which establishes a fund for Municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

PRDOH values collaboration with Municipalities and looks forward to a continued positive working relationship with municipalities throughout the life of the grant.

Comment: #250_10-21-18_ Yolanda Rodríguez (Municipio de Vega Alta)

"... In said proposal no funds were requested for Economic Development. However, it is of cardinal importance that this important component be added to the proposal submitted. Particularly as concerns the bases for attracting business activities. The reason for this has to do with the large amount of companies and businesses in our town that were affected by the hurricanes. The funds requested to drive the MUNVA's Economic Development component would be used for the following projects:

- *Reconstruction of the structure of El Morro, in order to convert it to an light industrial park, with the purpose of promoting the establishment of small businesses of different types.*



- *Acquisition of abandoned structures which used to shelter companies and businesses, in order to rebuild them and put them in the market for interested businesspeople and entrepreneurs.*
- *Development of a Municipal Corporations Program, which would be in charge of promoting entrepreneurship and provide technical assistance to existing corporations.*
- *Conversion of two schools not in use, which were transferred to the MUNVA, into business and investment opportunities.*
- *Acquisition of two schools from the Maricao and Bajuras Barrios, which belong to the Department of Education, and are not in use.”*

PRDOH Response: PRDOH values collaboration with municipalities and looks forward to a continued positive working relationship with municipalities throughout the life of the grant.

Municipal projects, like some of those listed here, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Large transformative projects which create jobs and/or cascading economic impacts may be eligible for funding under the Economic Investment Portfolio for Growth program. Currently available information regarding this program is available in the Action Plan.

Comment: #251_10-21-18_Víctor Emeric Catarineau (Municipio de Vieques)

Summary: The document received highlights the impacts of Hurricanes Irma and Maria on the Municipality of Vieques and provides an estimate of remaining unmet needs. Additionally, the document includes the following quoted commentary on alignment of projects proposed by the municipality and programs outlined in the Action Plan. The document submitted includes project proposals in the areas of housing, infrastructure and economic development. Projects proposed

Housing:

- *Construction of housing units on municipal-owned land*
- *Rehabilitation of housing in different sectors of the municipality*
- *Improvements to the municipal CDT, which provides dialysis and serves as a primary care clinic*
- *Construct and emergency operations center*
- *Improvements to the breakwater/pier in the Mosquito Sector of Florida*
- *Improvements to electrical infrastructure*
- *Improvements to the pier and boardwalk in the Playa Esperanza Sector*
- *Re-pavement of municipal streets and pathways*

- *Program to provide in-home aides*

The comments close, as quoted below, with a request that small municipalities be charged with leading recovery programs.

“We know the bureaucratic gigantism that exists in the Department of Housing and in every state governmental agency, as well as the newly created Office of Recovery’s lack of experience in the administration of CDBG funding. We know that they have the best intentions, but we believe that it is not the time for inventiveness and trial of new processes which, due to the existing regulations, cannot be substituted or altered. Therefore, we respectfully request that these funds be delegated to the municipalities, in accordance with the established process.

The integral development of our Municipality depends on working jointly with the State in the recovery and reconstruction process, with the allocated funds. It is our legal and moral responsibility to fight so that small municipalities can develop and manage their projects; have the power to hire local businesses to design and work on these projects; be able to”

PRDOH Response: Municipal projects, like some of those listed here, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Programs outlined in the Action Plan are not geographically restricted within Puerto Rico. Residents of Vieques may be eligible to receive assistance.

Comment: #252_10-21-18_Jelliam M. Díaz Pérez

Summary: The document submitted describes Centros Medicos Academicos Regionales de Puerto Rico (CMAR) as groups of one or more hospitals, health facilities, medical groups, and medical training programs whose mission is education, research and provision of health services, established by Law 136 of July 2006.

The document provides statistical data regarding medical graduates and practicing doctors in Puerto Rico and the impacts of Hurricanes Irma and Maria on public health services. To contribute to the socioeconomic recovery of the island, the document suggests a Plan for the Development of Medical Specialties, which contemplates creation of at least 50 graduate medical training programs, for an investment of \$120 million. The proposal indicates that 150 jobs would be created and list eligible activities which may be sited to support the program.

PRDOH Response: Thank you for the comment. Large transformative projects which create jobs and/or cascading economic impacts may be eligible for funding under the Economic Investment Portfolio for Growth program. Currently available information regarding this program is available in the Action Plan.

Comment: #253_10-21-18_ Zoraida Vega de Rodríguez (Esperanza Para la Vejez, Inc.)

Summary: The comment submitted is a project proposal for the rehabilitation of social interest housing under the Esperanza Para la Vejez organization, which sponsors 4 activity centers, 3 volunteer programs, and 3 housing programs in 16 municipalities across the island. The document provides statistics and data related to the elderly and aging population. The project proposed is for conversion of row houses in the Cuatro Calles Sector of Ponce to provide rental housing for elderly people of limited economic means. It is proposed that CDBG-DR funding be used to fund this project.

PRDOH Response: Thank you for your suggestion. The Multi-Family Rehabilitation, Reconstruction, and Resilience program provides funding for rehabilitation of multi-family housing projects. The Social Interest Housing program aims to provide dignified, resilient housing for vulnerable populations, including the elderly.

Comment: #254_10-21-18_Hispanic Federation

“We have organized and numbered our comment by theme, as follows:

I. Integrated Vision: we promote an integrated and comprehensive vision of housing. The Plan maintains a segmented vision about housing issues in the process of recovery, particularly reconstruction. Certainly, the Plan has improved on this subject in each of its versions. The “Multi-Sector Program” even recognizes the intersections of the different sectors in some potential activities. However, there absent or disassociated elements in the efforts proposed by the Plan. We believe that it is necessary to develop complementary programs, or to associate existing programs (public or private) through their referral (among other means) in several topics, even when some of these services are not eligible to receive CDBG-DR Funds. Even if the Plan concentrates in making the distribution of CDBG-DR funds viable, we cannot lose perspective that the recovery initiatives are not limited to this task. The Hispanic Federation believes that the answer to a complex problem requires approaches of a similar nature. Among the complementary services that we believe need to be associated, are the following:

i. Health (physical and mental)

ii. Disabilities (physical and mental)

iii. Domestic Violence

iv. Discrimination

v. Technical Assistance (varied)

vi. Financial Services

vii. Access to Capital

viii. Personal Care

ix. Legal Aid

X. Education

xi. Opportunities

xii. *Governmental Management*

xiii. *Others*

Due to the absence of a comprehensive public policy about the housing issue, we believe that it would be responsible and necessary not only to articulate such a policy for this effort, but also to prepare and submit legislative strategies to address the issues from the root, such as: the disparity in the need for affordable housing in comparison with what the market has to offer; gentrification; urban scattering; the real-estate bubble; inequality; proliferation of abandoned property; speculation and lack of effective regulation, which has allowed for the practices, trends and behaviors that have provoked these situations.”

PRDOH Response: Thank you for your comment and for your support of the addition of a multi-sectoral program. Your outline of key linkages between programs is helpful and PRDOH shares your view that these linkages are important, require a holistic view, and an ongoing emphasis on how to serve the person/ family/ community as a whole.

“2. Priorities: Despite our recognition of the need to diversify strategies about how to promote a fair recovery for Puerto Rico, we do perceive that the Plan is in many ways far from the main issue: Housing. With an allocation of over \$20 million (limited only to CDBG-DR Funds), we believe that the entire housing issue in Puerto Rico must be upset and transformed drastically and for the better.

In the Economic Recovery sector, (although it does happen in other Programs) it is difficult to make a direct link as to how these strategies or Programs with important elements, such as: 1) how they were conceived, designed, justified, and selected; 2) how they will directly impact people of low or medium income; 3) how they will positively impact the general economy of Puerto Rico.

We believe that, in order to ensure that these Funds are used responsibly, and canalized through local organizations of the community base, all Programs should have Maximum Allocations, even if they are distributed through other agencies.

According to the information provided in the respective description of the Programs, it is not possible to justify or clarify the amounts allocated to some items. Among these Programs, are the following:

- a) Economic Recovery Planning (\$22.5 million)*
- b) Title Clearance Program (\$40 million)*
- c) Economic Development Investment Portfolio for Growth (\$800 million)*
- d) Tourism and Business Marketing (\$100 million)*

As we identify the performance of these initiatives (in terms of a cost-benefit analysis including social factors), we will be able to see their potential impact. We believe that a more aggressive agent in the affordable housing sector is possible. Also, we believe that this should be reflected in the distribution of the funds. Therefore, we propose certain principles to be applied in a revision of the Plan:

Among these principles, we propose the following: 1) A clear incentive through housing re-development programs in urban centers, using the large inventory of currently vacant units, which are abandoned and not in use; 2) Granting more value to real needs, instead of to profitability or cost-effectiveness analyses, or to the presence of funds levered in projects that were designed before the disasters occurred; 3) Patently demonstrating, in an accessible and transparent manner, and through the use of the best available data, the response to the populations that were most severely affected by the events of the disaster; 4) Guaranteeing at all levels the inclusion of the citizens in general in the decision making processes.”

PRDOH Response: As the Department of Housing, PRDOH believes that housing is a fundamental, central part of the recovery. Housing is the single largest sector of the Action Plan, accounting for more than 40% of the programmatic allocation. As the oversight agency for Section 8 and Public Housing, we also understand that access to employment and economic opportunity is necessary to have a long-term, sustainable impact on the lives of low and very-low income households.

The programs outlined in the economic recovery section offer a comprehensive set of entry points for local businesses and workers, ranging from accelerators and incubators to small business financing and revolving loans. The PRDOH Section 3 plan will incorporate goals for all contracted firms for local hiring of business and low-income individuals. Job creation will be tracked and reported for all applicable programs.

PRDOH acknowledges your recommendation regarding financial modeling and plans to measure and track economic output of CDBG-DR investments related to the Puerto Rican economy. PRDOH also agrees that city-center redevelopment must be incentivized and will continue to seek the appropriate manners to do so, whether in the Action Plan or program guidelines.

“3. Rights for a Fair Recovery: Groups such as Legal Aid Puerto Rico have made great contributions to the drafting of a Manual for Lawyers amidst Disasters. Among the very useful contents of this guide, there is a list of rights of people affected by the events of a disaster. This type of list has been recognized in other jurisdictions, such as Texas, in the same processes.

Among the Rights to be highlighted are the following:

- a) Right to Dignified Housing*
- b) Right to Real and Effective Participation*
- c) Right to Stay*
- d) Right to Decide*
- e) Right to Equal Treatment and Non-Discrimination*
- f) Right to a Health Environment*

We recommend that this effort be recognized, and the inclusion of a bill of rights in the Plan. For further details, visit recuperacionjustapr.com

4. *Participation: We are very thankful for the public hearings, even if HUD (or the United States Congress) did not impose them as a requirement. Anyway, it shows receptiveness from the Department of Housing that the comments process was extended to 30 days, as previously suggested. We will make the observation that we understand that the process of public hearings should not be held at the same as the term for delivering the comments. It is expensive and complicated to designate resources and time to multiple processes simultaneously. We also recommend the promotion of educational material about the details of the Plan, like it has been done by the Department of Housing with other Programs, such as “Your Home Reborn” or “We Build”.*

We have previously heard talk about the creation of consulting bodies of community outreach to assist in the implementation of the Plan. We recommend that details such as their composition, processes, influence on the Programs and Initiatives, and how these instances would incorporate to the governing not only of the Plan, but of the future of housing in Puerto Rico.”

PRDOH Response: Thank you for your public policy recommendations. PRDOH is committed to reducing poverty and social inequality. Thank you for your recommendations regarding the public hearing process. In order to meet federal timelines, comply with posting requirements, and provide opportunity to review the public comment submitted and incorporate changes to the proposed plan, it is often necessary to conduct multiple activities concurrently. We also agree that educational materials are important and encourage you to monitor the CDBG-DR website and social media pages for new materials as they are released.

“We are particularly concerned about: 1) the context and criteria for the non-competitive selection of partners for the different programs; 2) the calculation of the participation and expectations of the programs without ever having conducted a formal process of calls to proposals (RFP). In case it is required that the organizations implement project to then collect a reimbursement, this will represent an unsustainable additional burden for many. We recommend a program that will tend to this, in order to guarantee more local and community participation.

5. *Transparency and Access to Information: Among the practices we recommend should be consistent throughout the whole process we include the following:*

- *Publication of every contract, with some information that the Comptroller’s Office does not include as categories for the description of use, justification and product of the funds. A link to the contractor’s website should be included.*
- *Publication of all subcontract, offering the same information.*
- *The documents and criteria used (technical and of public policy) for the selection of both partners and proposals and projects should be published. The same for each decision affecting the process, whether in form or its possible results.*
- *Publication of a guide of eligibility criteria for possible participation in each Program or initiative.*

- *Keep a website with all the information used for the decision-making process, including: reports, studies, tables, layers of geographic information, inventories, etc. This should identify the source of the information.*
- *In the cases of Programs, their distribution should work with a Society Model. Offer details about the expectations and preliminary models of the types of contracts that will be offered, and what the relationship between the contractors, partners and governmental agencies will be like.*
- *Creation of a virtual platform where people can have access to the progress of projects, and comment on these.*
- *Development of educational videos and/or information capsules answering frequent questions.*

6. Multi-Sector Programs: Both Programs, "Puerto Rico by Design" and "City Revitalization" are projects that should be defined in greater detail to guarantee more clear purposes and objectives. Limiting these funds to entities with levered funds limits greatly the character of the intervention, and affects the type of population that will potentially be impacted. The programs need guarantees that they will have an effect on fundamental problems about the housing issue. However, the activities are limited to: 1) creation and retention of jobs 2) development of public infrastructure.

7. Capabilities of the Affordable Housing Development Sector: We recommend that in the medium and long term attention should be paid to expanding and developing the capabilities of non-profit organizations dedicated to the creation of affordable housing and related services."

PRDOH Response: Thank you for your comments. PRDOH is committed to leading a responsible and transparent recovery effort. As required by 83 FR 5844, PRDOH must post information related to its CDBG-DR Grant to its website for public consumption. Information including procurement policies, contracts, Quarterly Performance Reports (QPR), expenditures, program policies and procedures, and other related information will be posted to PRDOH's disaster recovery website at www.cdbg-dr.pr.gov as it becomes available.

As mandated by HUD, PRDOH must follow HUD-approved procurement processes which encourage fair and open competition and comply with 2 CFR 200. Information regarding contracts procured by PRDOH related to its CDBG-DR grant, including contract value, start and end dates, summary of scope, and complete copies of executed contracts, is available publicly at <http://www.cdbg-dr.pr.gov/contratos/>. Program guidelines and outreach materials will be posted to the website for all programs as they are approved by HUD and ready for implementation. PRDOH is also committed to posting relevant reports to the website in the Reference Material section.

Comment: #255_10-21-18_Diane Cohen (Finger Lakes ReUse, Inc.)

“To Whom It May Concern, I am writing to encourage consideration, as part of a mixed-use neighborhood development plan, to include a place for the exchange of (reused) materials. All future neighborhoods should be designed with a community-based ReUse Center due to the multiplying benefits that occur when this type of infrastructure is in place. A huge contributor to resilient communities, ReUse Centers provide affordable materials to people who need them most, a convenient alternative to the landfill, a place to teach and preserve important skills, and they create quality jobs. Perhaps more importantly, they can not only be self-supporting financially once launched, they provide enormous assets and value to the community.

Material exchanges or ReUse Centers, in particular community-based ReUse Centers, are a powerful way to reduce waste and rebuild community. I am the Director of a nonprofit organization in Ithaca, NY, and have participated in EPA-funded disaster response training. Lack of reuse infrastructure is a universal problem, but please consider it in future planning. We offer a free online business plan template for any community who wants to start their own independent community reuse center: template.ithacareuse.org. I appreciate the opportunity to submit this comment.”

PRDOH Response: Thank you for your comments. PRDOH has taken this into consideration.

Comment: #256_10-21-18_Jannette Lozada (Comunidad San Isidro, Canóvanas)

“San Isidro developed in 1948 by way of a 275 lot grant provided by the DOH, is facing severe struggles in the community without municipal and state permits to build their homes. Areas of San Isidro were classified as a Special Community (Law No. 1 of 2001) due to the existence of families with low economic resources, high level of unemployment, poor access to health services and lack of water and electricity services.

Notification and participation:

- *FEMA and SBA responses were not effective and did not provide substantial aid to the community. FEMA supplied many denials due to lack of title. This has been appealed by many community member and assistance still has not yet reached them. Additionally, there have been situations with the FEMA inspectors themselves, mainly due to discrimination on origins and those who do not speak English.*
- *“Tu Hogar Renace program: has been ineffective. In some specific cases they made some minor repairs and then never returned, in others it was so much the time that passed between each inspection that residents decided to rebuild part of the residence with materials they found in the area and when they return the inspectors inform the resident that the only thing that remains is to paint and that they cannot do more repairs because they are already done. This causes that the reconstruction has not been effective or safe and that the residents feel affected by the process as well as by the treatment received from this program of the government of Puerto Rico. They keep residents in constant uncertainty by requiring follow-up calls and by not completing the processes properly.”*
- *Outreach: Residents have limited or no access to the internet or social networks struggle to get information about the CDBG-DR funds and the processes that are taking place such*

as the public hearings. Community was not notified of public hearings and had no way to present comments on how funds should be used in this town.”

PRDOH Response: Thank you for your comments. CDBG-DR funding is intended to satisfy needs not met by other sources, like FEMA and SBA. As outlined in the Action Plan, PRDOH will use traditional and non-traditional methods for verifying ownership.

“Housing:

Hur. Irma and Maria damage wiped out 40% of houses and houses that survived suffered greatly from 15 feet floods and strong winds, because of the damage sustained, the following assistance is needed:

- *Reconstruction of long-term stable and secure housing*
- *Restoration of power and clean drinking water for consistent use and consumption*
- *Restoration of the initiative of Renacer Comunitario y Autogestión (ReCoA) project that was implementing upgrades to the water system so there can be potable water which was paralyzed by the municipality*
- *Construction of a dam to prevent future floods that will impact this community.*
- *To maintain the community and its homes without having to resort to relocating or displacing people is the construction of a dam since the community is located within the river basin just above a wetland and in the floodplain of the river. Rio Grande de Loíza*
- *Quality Tools and resources needed to make rehabilitation repairs safely*
- *Funds assistance for housing as FEMA provided no aid or not enough to make the needed repairs.*
- *Serious consideration before trying to displace members of the community due to their health and economic conditions as there are many elderly people, sick, bedridden who do not have the facility to move.*
- *“Policies must be developed to protect the community from displacement. If they are going to relocate or relocate because the risk of loss of life is greater, they must prepare a relocation program. The guiding criteria of this program will be to ensure the fullest participation of the people affected in the relocation process and to keep people within their communities or close to them. The program should initiate an educational campaign explaining high-risk situations to residents. Housing options should be attractive to residents and there should be incentives to promote voluntary relocation, including better access to opportunities.”*

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. All relocation contemplated in the Action Plan is voluntary.

PRDOH agrees that planning works best when it is community driven and involves Municipalities and non-profit or community groups. PRDOH has designed programs such as the Whole Community Resilience Planning with those considerations in mind.

“Infrastructure needs and economic development:

- *Develop a plan on adequate use of the land and repair work that needs to be completed to roads, infrastructure, electric power systems, potable water system and construction of homes.*
- *Establish an actual electricity system, there is no legal infrastructure for the electric power system and there is no aqueduct and sewerage service. “This leads to their having to respond in a fragmented and immediate way, with the help of the municipality they fill the streets, causing residents install power lines in order to obtain energy. They rebuilt or cleaned the common areas, like the streets and the pipe itself. To fill the holes in the road used pieces of clay or collected money between the neighbors to be able to implement the fixes.*
- *Job creation and incentives for local businesses to reopen*
- *The College of Engineers and the College of Architects presented Project Chamber 1607 to make an office of access to design and construction for those people who do not have the resources to reach design professionals. The proposal is that licensed professionals and those who are doing their practices assist them. For this they are using some basic models for the construction of resistant homes. They presented the “My Resistant House” model used to design a house for the Martín Peña Canal, taking into consideration the conditions of that place. This is another proposal that could benefit the residents of San Isidro.*

Vulnerable population

- *The residents of San Isidro are under the age of 19 or between the ages of 40 and 59 years. The majority are women or recently graduated from high school, or not in the workforce and live below the poverty levels.*
- *“The data of the CENSO does not necessarily cover all the residential areas of the San Isidro neighborhood.”*
- *‘There are many residents with different health situations, mainly due to the lack of access conditions in which the community is located. Access to basic services of water, electricity, safe housing, medical services and food. Situations that worsened with the passage of the hurricane, even, that caused the death of some residents.’*
 - *Including those with gastritis, asthma, diabetes, anemia and kidney problems. Some residents were also affected by leptospirosis, including two deaths due to this disease. Pest situations were also a factor in the community due to water impoundment.*

Discrimination and mistreatment of residents is a consistent occurrence due to either the non-Puerto Rican background and difficulties speaking English and residents social condition. Specifically: Several residents commented that the inspectors spoke English or knew little Spanish.

“The residents have been mistreated by the inspectors, they were sent to shut up, they made jokes about the situation, they sent the letters in English even though the residents requested them in Spanish. Other residents did not receive guidance on the appeal process.”

Proposals

- *Main proposal: Construction of the dam for flood control and to allow for residents to remain in the area they choose to live and not have to relocate when that is not an option. This construction would benefit not only San Isidro, but also Monte Verde, Las Delicias and Parcelas Viejas.*
- *Consider and take into account the number of elderly people, sick, and the youth who are not able to be relocated due to their limitations.”*

PRDOH Response: Thank you for your comments. PRDOH understands that Spanish-language capabilities are of the utmost importance for recovery of Puerto Rico. Program implementation will be conducted in a manner which will not cause discrimination on the basis of race, color, religion, sex, disability, familial status, or national origin.

Infrastructure projects may be eligible under the FEMA Coordination, Critical Infrastructure Resilience, or City Revitalization programs.

Comment: #257_10-21-18_Marisel Canales (Compañía para el Desarrollo Integral de la península de Cantera)

“I refer to our past letter of May 23rd, a copy of which is included in this communication, and to our meeting the staff from the Department of Housing last July 5th, 2018. In these, we expressed our intention to have you consider the inclusion of certain projects under development in the Cantera Peninsula, using funds from the CDBG program, by the Company for the Integral Development of the Cantera Peninsula (CDIPC, by its Spanish acronym).

The economic development projects are our priority at this time, considering that the infrastructure systems that will serve these and the community in general are resilience and mitigation improvements. We deem important to mention that about 5,000 families live in the South and North Barrios of the Peninsula, and they require assistance for their houses, and therefore following our ministerial responsibility, as their immediate representatives, we have included comments on the housing projects.”

The summary of comments to the Action Plan for Recovery in the Face of Disasters is included below:

“COMMENTS TO THE SECOND DRAFT OF THE PLAN OF ACTION

1. General comments on Planning Projects

Whole Community Resilience Planning:

“The Company for the Integral Development of the Cantera Peninsula (CDIPC, by its Spanish acronym) has vast experience in the planning and development of all kinds of projects related with the redevelopment of a community, including: infrastructure, housing, re-accommodation,

and demolitions; as well as socio-economic projects from squares and promenades to economic, cultural and recreational development projects.

Months before hurricane Maria, we had begun some pilot project, and had obtained funding to develop sewage and improvements projects—restoration of pluvial sewage in several sector, using modern methods combined with the traditional systems accepted by the Aqueduct and Sewage Authority, while incorporating improvement in the quality of the water and the environment of the bodies of water that surround the peninsula. The inclusion of improvements of housing that might help the situation of the sewage would be incorporated to these projects.”

Agency Planning Initiatives:

“The Cantera Peninsula Project has all the characteristics listed in the Agency Planning Initiatives program, due to the need to register their lands and properties, prepare distribution plans, and finally deliver property title deeds to their residents. All of these activities are contained in their creating law (Law # 20, of July 10th, 1992), which requires their implementation by the Department of Housing and the Municipality of San Juan, and which due to various causes has not been resolved. In the past months before hurricane Maria, the CDIPC had begun efforts to finally resolve this situation)”

Economic Recovery Planning:

“The CDIPC sustained great losses in their ecotourism projects, which need to be reestablished, improved and expanded. There is also a need for spreading the possibilities for economic development associated with activities that the Cantera residents are familiar with, and would be inclined to start businesses for.”

PRDOH Response: Thank you for the comments. PRDOH has taken this into consideration.

“2. General Comments for Housing Projects

Flooding Areas:

The determination of the flooding areas on site is necessary following the standards used by the insurance companies. There are many cases where the flooding line “invades” areas with an elevation is higher than the flooding levels. This is because many times the map used as basis at the time of the determination of the elevations under the flood levels was not up to date with respect to the terrain. We recommend that this should be revised on site by conducting the relevant survey studies, so as to avoid mishaps and costly expenses to the residents of these areas.

Structures with an original base floor of two feet above the flood level for the Hundred-year Rain should be considered apt to receive the benefits of the programs as well.

On the other hand, research on possible improvements on flooding terrain should be conducted, to determine those where work could be done to rescue the terrain at a much lower cost than that implied in the relocation of its residents. Measures such as those suggested above for the CDBG-DR working plan and its objective of minimizing the displacement of residents should be taken to the benefit of the cost involved, both economically and socially. In the areas where it is finally determined that the best solution is relocating its residents and demolishing the properties, there should be a planning and terrain use study, so that these lands do not become a burden to

the state and adjacent residents due to lack of maintenance, or to give them appropriate uses that will generate socio-economic benefits for the general public.

The possibility of reusing these lands after relocation and demolition could include their filling, or engineering work that could have been done if structures had been in place, for the construction of projects of all kinds, including residences. In any case, it is necessary to designate a government agency that will be in charge of these, including the budget for their maintenance and potential socio-economic development.

Repair and Reconstruction of Affected Housing:

Hurricane Maria affected with its winds the covering elements of the roofs of approximately 292 structures which were mostly used as housing. Of these, approximately half are located in area outside flooding zones, according to the designation of FEMA maps. Most of these have the problem that they have no property title deeds, because they were lands whose owners have not been identified in the property registry. Both the San Juan Municipality and the Department of Housing and the Lands Administration, designated by Law # 20 of July 10th, 1992, according to its amendments, had the responsibility to manage this situation and grant property title deeds to the neighbors of Cantera. We have made great efforts to resolve this, but with positive results for no one.

The Company has requested that the disaffected lands in maritime terrestrial zones, and those whose title cannot be found in the Property Registry, which should be in favor of the Free Associated State, be transferred to the Company so that it can grant the relevant titles in accordance with its creating law. See P. of S. 931.

Given that this is a situation that the state has not been able to resolve, we respectfully request that the residents of are exempted from this formality, or else that they can start resolving the legal aspects that prevent a solution for this issue; as well as the allocation of funds so that the work of granting property title deeds in Cantera can be done, and their residents can participate in the restoration and repair programs for their houses.

Project Request:

For the Housing Programs, the (CDIPC) requests participation in the following programs:

a. Repair, Reconstruction or Relocation of approximately 350 structures in the South and North of the Cantera Peninsula

b. Granting of Property Title Deeds to the residents of Cantera”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

As outlined in the Action Plan, PRDOH will use traditional and non-traditional methods for verifying ownership. The Title Clearance program is designed to assist homeowners in obtaining clear title.

Thank you for the thoughtful comments regarding possible solutions for properties in the floodplain.

“3. Economic Recovery

Incubators and accelerators for small Businesses:

The Cantera Peninsula project created in the year 2012 an entity called Peninsula Expeditions, with the object of creating a corporation that would generate jobs for its residents, using the natural conditions of its environment with the lagoons of Los Corozos, San Jose and the channels system that exists leading to Boca de Congrejos. The project, which was successful then, was severely affected by hurricane Maria, particularly the infrastructure needed for its operation, which included docks, visitors reception areas, storage of aquatic vehicles, and access and exits from the project.

This project had trained personnel for these activities, and the DRNA permits for its facilities and operations. Now we have the opportunity to accelerate its reopening with the purpose of creating once more a source of employment for its residents, through that will attract again the trained staff and new candidates who will be prepared the different concepts offered by the project. These are thematic trips through the different bodies of water, observation of the flora and fauna wealth of its natural scenes, and visits to the community that is stepping away from the rampant poverty that it once had, and how they have worked for their own socio-economic recovery.

This project already had personnel trained for these purposes by the Department of the Environment and Natural Resources, DENR, with permissions to use its facilities and operations. Now there is an opportunity to accelerate its reopening in order to create once again a source of employment for its inhabitants through a program to attract trained personnel and new candidates who will be prepared for the different concepts offered by the project. These are thematic trips through the different bodies of water, with the observation of the richness of flora and fauna offered by its natural scenery and visits to the community that rises from the rampant poverty that it once prevailed and that now shows how it worked for its socioeconomic recovery.

For these purposes, fund availability becomes necessary for the recovery of the business and the acceleration and expansion of its operations along with the advantage of a project that counts with operating permits and existing facilities required for its function. This should be accompanied by infrastructure improvements for those streets and utilities that were severely impacted by Hurricane Maria.

To the above-mentioned project, it is necessary to add the interest of its inhabitants in the development of job training centers in a community that 40 years ago were sources of labor in technical tasks such as construction, wood and metal furniture manufacturing, turners, electrical work, plumbing, and vehicle transmitting. With the passing of time and the economic recession throughout the island, these trades have been lost. However, given the resurgence of reconstruction work and the need for know-how of emerging technologies and traditional crafts, there is an opportunity to create a job training program in the infrastructure of Sofia Rexach Elementary School scheduled to be vacated in 2019. Many residents in their advanced age are willing to transmit their knowledge and complement it with new technologies such as alternative energy sources.

It is necessary to mention the need to create well-trained technicians in the areas of environmental mitigation (asbestos and lead, water quality, etc.) as well as in environmental restoration projects along the bodies of water that make up the Cantera Peninsula. This type of technical training is also necessary for the guiding service available for Peninsula Expedition projects.”

PRDOH Response: PRDOH understands that economic recovery is a vital part of a comprehensive recovery effort.

“4. Investment Portfolio in Economic Development for Growth

The commercial areas located on Barbosa Avenue and the proposals for eco-tourism development require appropriate infrastructure to get back on track. For these purposes, it is necessary to carry out geometric, ornamental and utility upgrading works, as well as improvements to the existing rain and sanitary utility systems in the main access streets and the entrances to Cantera. These areas are common with other projects such as the ENLACE project for the Martin Peña Stream of which Cantera is part (G-8) and therefore its benefit will be shared with sectors suffering from similar problems.

Project Request

The following is petitioned for this program:

- *Relocation of the 115mv electric transmission line to the shore of the Martin Peña pipe according to an agreement between AEE, ENLACE and CDIPC. During the hurricane Maria this line collapsed on houses, schools, and shops with the good fortune of not being energized at the time. However, its reconstruction did not improve its design for similar events. This project requires the relocation of approximately 20 families and the demolition of some 30 structures. It will allow the construction of an access road for maintenance of the new 115mv lines and for the future construction of the pipeline Martin Peña.*
- *Geometric improvements at the intersection of Barbosa Ave and Rexach Street. This includes improvements to the local retention pond to improve flood conditions in the area.*
- *Signage Improvements in the marginal streets of the Barbosa Av. and of the access points to improve customer accessibility to existing shops.*
- *Improvements to the central streets to facilitate both entry and exiting of the extreme east part of the Peninsula where the eco-tourism projects are located. This also includes improvements to the access roads to the North of the Peninsula (Eduardo Conde Street). Both routes will become the main accesses for tourists, visitors and researchers who will be visiting the Linear Promenade facilities of the Peninsula Expeditions project.”*

PRDOH Response: The Whole Community Resilience Planning program offers communities an opportunity for community-led, comprehensive recovery plans. Infrastructure projects may be eligible under the FEMA Coordination, City Revitalization, or Critical Infrastructure Resilience programs.

Re-Grow PR Urban-Rural Agriculture:

The peninsula of Cantera has terrains that can locate agricultural companies in thresholds destined for the production of ornamental and edible plants and for the use of mitigation in canalization projects of the Martin Peña Stream and for the reforestation of mangroves and native plants that are located along the stream's shores and of the lagoons.

Meetings have already been held with the Agricultural Extension Service Staff regarding the launching of a pilot project for these purposes. Several residents have shown great interest in its development and are waiting to see the availability of funds to carry out this project.

Request

- *Assistance from the Planning Board to ensure the proposed activity on the site.*
- *Funds to build improvements to the site*
- *Funding for the construction of two thresholds of approximately 100 feet by 30 feet.*

5. Infrastructure Management

The mitigation and resilience of the community of Cantera is of paramount importance to minimize the effects of natural events in an area of low-income families with poor basic infrastructure. Rain infrastructure improvement projects will eliminate the effect of flooded streets due to deficiencies in their existing systems that affect the normal activity of children, adults and the elderly residing in the community. The fragility of the electrical distribution and lighting system in the neighborhoods and residential areas after Hurricane Maria constitutes a serious problem for the free coexistence and security of the good residents of the community.

We have previously mentioned the need to provide new access roads to the South of the Peninsula that will not only relocate electric transmission lines in systems that guarantee their resistance to natural events; but also to provide essential services to their residents as well as to improve the conditions of the existing main streets both in their geometry and in their infrastructure systems, mainly the pluvial one.

There is the possibility of creating community resilience centers with the advantage of having an organized community ready to initiate programs in existing structures (Sylvia Rexach School to close in 2019-2020) and the existing community center.

Request:

- *We believe that the Cantera peninsula project is ready to undertake projects within this program and we request that it be included in it.*

6. Multi-sector initiatives

We believe that the projects presented above would also qualify under this program. In the case of the Peninsula de Cantera project, according to legislation, this is made up of three organizations:

- *Cantera Peninsula Neighborhood Council - Nonprofit*
- *Business Support for the Cantera Peninsula - Non-profit*
- *Company for the Integral Development of the Peninsula of Cantera - Government Agency*

Thus, the advantage resulting from the organizational management of the various entities that could receive benefits under the CDBG-DR project is available as well as their physical infrastructure and professional resources.”

PRDOH Response: Programs in the Action Plan are not geographically restricted within Puerto Rico. Citizens of the Cantera Peninsula may be eligible to receive assistance under these programs.

Comment: #258_10-21-18_Jan Susler (The National Lawyers Guild Puerto Rico Subcommittee)

“Vulnerability is not simply a product of natural conditions; it is a political state and a colonial condition.

Floods wash away the surface of society, the settled way things have been done. They expose the underlying power structures, the injustices, the patterns of corruption and the unacknowledged inequalities.

The comments offered here endorse the comments of Puerto Rico Legal Assistance, and hope to put them in the context of the historical use of Community Development Block Grants – Disaster Recovery funds, aiming to avoid repeating the errors of the past disaster recoveries, which have adversely affected those hit hardest: low and middle-income people and their communities.

The U.S. Congress established the Community Development Block Grant program, in 1974, to provide flexible funds that states would control. Grants were historically awarded to grantees who met three Housing and Urban Development criteria: to (1) benefit low and moderate income people, (2) aid in the prevention or elimination of slums or blight, and (3) meet other urgent community development needs because the conditions pose a serious and immediate threat to the community. For more than 30 years, HUD allowed limited waivers to these criteria, usually to facilitate applications by low-income people. However, after September 11 (2001) and Hurricane Katrina (2005), the first two criteria were eliminated, and the third criteria was applied to business interests of the well-connected, obviating any plan for fair or long term rebuilding. In the hands of neoliberals, the disaster recovery program originally designed to assist the needy converted into its opposite, privileging the private sector and stranding the needy.

Specifically, following Hurricane Katrina, the state of Mississippi diverted CDBG funds “away from programs addressing the housing needs of LMI [lower and middle income] victims of Hurricane Katrina toward financing commercial port expansion,” contrary to the purpose of CDBG funding: The members [of Congress] are rightly outraged by a state plan that will siphon off more than a half-billion dollars in disaster aid for the redevelopment of the port of Gulfport, which local boosters have long envisioned as a hub for cruise ships and gambling. That is not what Congress intended when it voted to distribute the Katrina aid through the Community Development Block Grant program, which was set up in the 1970s to improve housing, economic opportunities and quality of life for the poor.

Kevin Fox Gotham, a sociology professor at Tulane University and an internationally known expert on real estate and housing policy, political economy of tourism, post-disaster recovery and rebuilding, called this diversion of CDBG funds “not accidental or unintentional. Rather, officials

in Mississippi, with the approval of HUD, attempted to reallocate CDBG funds to encourage port expansion and recovery efforts for commercial businesses, thereby engaging in a planned subversion of the original objectives of the CDBG program.”

Also after Hurricane Katrina, the state of Louisiana failed to apportion appropriate funding to renters, whose homes had been affected, a frequent criticism of CDBG recovery plans. An administrative complaint filed with HUD alleged that this amounted to “the planned misuse of federal funds” for its “refusal to provide adequate resources for renters;” the complaint also alleged that the state failed to detail how the CDBG funds would be allocated to meet the requirement that 50% of the funds be targeted to primarily benefit low and moderate income people. While protests eventually resulted in the allocation of additional funds, the significantly delayed funding fell far short of the needs of the population CDBG was supposed to assist. “In short, CDBG-DR program design and implementation rules diverted funding away from housing assistance for renters, privileging homeowners and thereby buttressing long-standing housing inequalities.”

New Jersey’s CDBG plans for recovery after Hurricane Sandy (which struck in 2012) similarly failed to take into account the needs of low and middle income people – who were disproportionately affected and who were disproportionately Black and Latinx – with inequitable volumes of funds allotted to benefit those in higher income brackets. The plan was thus criticized for failing to address an equitable recovery, i.e., for failing to address the vulnerabilities of the population CDBG is supposed to be designed to target.

Yet another historical problem important to avoid repeating is the use of CDBG and other post-disaster relief as an opportunity to implement far-reaching neoliberal policy reforms, while people are still reeling from the disaster, otherwise known as disaster capitalism or vulture capitalism. As with the diversion of CDBG funds from low income people to commercial port expansion in Mississippi, delays in financing the rebuilding of New Orleans and subsidies to high-end real estate in Lower Manhattan are not merely accidental side effects, policy failures or unforeseen consequences of otherwise well-meaning government programs and actions. Nor are the problems of recovery and rebuilding the result of institutional ineffectiveness or bureaucratic sluggishness. Rather, the shortcomings of the government response to Hurricane Katrina and 9/11 are constitutive features of neoliberal government action and policy that privileges speculative financing and market rule to engineering urban recovery.

On behalf of the Puerto Rico Subcommittee of the National Lawyers Guild, we endorse the comments of Puerto Rico Legal Assistance, encourage you to avoid repeating the above-cited errors made in previous disaster recovery situations, and urge you to enact an equitable plan that emphasizes the purpose of CDBG-DR, to benefit low and middle income people.”

PRDOH Response: Thank you for your comment. As required by HUD, 70% of the funding expended under this CDBG-DR grant must be expended to benefit low- and moderate-income (LMI) persons. The overall budget included in the Action Plan demonstrates what percentage of each program is expected to benefit LMI persons. PRDOH response to comment submitted by Ayuda Legal can be found within these pages.

Comment: #259_10-21-18 _Natalia Ramírez (Espacios Abiertos)

“Transparency and accountability are central to the fair and effective distribution of federal and local funds in the recovery and reconstruction process. At all times, there must be open and participatory mechanisms for citizens to hold the government accountable and, in this way, to monitor where aid is going and how it is channeled. On the occasion of the presentation of the draft for a substantial amendment to the Action Plan, we present our comments for your consideration.

According to the Action Plan, the Department of Housing, under the CDBG-DR federal program, is committed to leading a transparent and orderly recovery. However, it lacks effective mechanisms and procedures to ensure that it does. Let's see:

The Plan does not include the adoption and implementation of a policy of transparency and access to information that provides clear guidelines on what type of information should be public.

All parties concerned must commit to maintaining adequate accounting and providing information on the programs, aid flows and expenditures in a timely, transparent, comprehensive and accessible manner. The adoption of a Transparency and Access to Information policy will be a step forward in improving public management and will facilitate proper oversight of the process.

We refer for your consideration and, by way of example, Executive Order No. 125 signed by the Governor of New Jersey during the recovery and reconstruction process following Hurricane Sandy in 2012. The Executive Order requires that detailed information on the allocation and expenditure of recovery funds be posted on a website. Specifically: (1) each State agency and department must submit any potential project involving the expenditure of federal reconstruction resources to the State Controller's Office before the contracting process begins; (2) each State agency and department must designate an Accountability Officer responsible for overseeing the release and use of disbursed reconstruction resources; (3) the Controller, in coordination with the Office of Recovery and Reconstruction and the State Office of Information Technology, shall make public on a website all contracts awarded and paid for with recovery funds; (4) each agency and department shall publish fraud prevention notices and the same shall be posted on all construction projects involving the use of recovery funds. Similarly, notifications should include toll-free telephone lines to report fraud, squandering and abuse of these funds; and (5) the Controller and the Office of Recovery and Reconstruction should report periodically on the information posted on the website.

The Department of Housing's website does not contain any policy, regulation or ordinance regulating transparency in the process of granting and spending federal CDBG-DR funds. To this end, we recommend the enactment of a policy of transparency and access to information, detailing what type of information must be available to the public, the format in which it must be published, and the process that the Department must follow in order for the recovery and reconstruction to be transparent and orderly.

The Plan lacks transparency in the process of awarding contracts.

Monitoring, as well as external and independent evaluation of the contracting process are key to ensuring the transparent implementation of recovery and reconstruction programs and that

public resources are not diverted from their purpose, which is to help vulnerable populations. It is imperative that the Plan include appropriate mechanisms to ensure controls on contracting and avoid order changes that are not in line with the original objective. Some mechanisms could be: integrity pacts, evaluation criteria open to the public, time-bound master plans and construction requirements, among others.

By way of illustration, the website "NJ Sandy Transparency: Accountability. Integrity. Oversight", New Jersey, publishes information on all contracts by agencies and departments paid with recovery funds following Hurricane Sandy. The information published on the website includes details such as: the name of the contracted provider; the subject of the contract; solicitation documents; the provider's proposal; the final full contract along with other relevant documents; and the date the contract was awarded. It should be noted that the portal also includes a section on amendments and changes of orders to awarded contracts.

The Department of Housing's website only includes a link to the Central Office of Recovery, Reconstruction and Resilience (COR3) website, but it fails to disclose contracts awarded with federal recovery funds. Including a link to the official website of the Office of the Controller does not meet the standard of maximum disclosure of information, since it does not specify which contracts are paid with these funds and which programs and projects have been awarded. For this reason, we recommend disclosing all vendor name contracts, the subject of contracting and bid proposals.

The Plan does not provide the disclosure of information regarding federal CDBG-DR program funds in an open data format.

Data related to the distribution of CDBG-DR program funds must be published in an open data format. This means that any data collected or generated by the Department of Housing must be made available to the public so that they can use it freely in a simple and comfortable manner. This is important because it allows us to evaluate, analyze, and compare information that highlights trends, statistics, or patterns that show inequalities and challenges, as well as show progress in the use of these funds.

For example, the website "NJ Sandy Transparency: Accountability. Integrity. Oversight" mentioned above, contains a fund monitoring section for each state agency that has received recovery funds. It provides access in the form of open data and downloadable Excel spreadsheets through which information can be easily filtered and analyzed. The spreadsheets contain relevant data related to all the programs available that can be filtered by any state agency. It even offers the option to view all the data, a summary, and a reference glossary to understand the published data. The following information is provided for each agency: date, the source of funds (federal agency granting funds), the name of the program to which the funds are destined, its description, the name of the project, its description, the amount allocated, the amount obligated and the amount disbursed.

It should be noted that the COR3 Construimos portal does not meet open data standards, as Excel spreadsheets with the information required for the data are not included to be downloaded and reused for analysis.

In addition, the information provided on the website is incomplete, as it is unknown when public assistance funds were awarded by municipality or agency, what provider was awarded the contract or what bidding proposals were received, and how much money was allocated or disbursed per project. Similarly, the Construimos portal lists additional federal grants for the country's recovery; however, no information is available as to whether these funds have been released, to whom they have been awarded, nor the amount of the grant.

The Action Plan adopted should take advantage of federal compliance requirements for federal recovery funds in order to entrench a culture of access to information and accountability. The recommendations we endorse are precisely a roadmap for ensuring that CDBG-DR funds are used and distributed effectively and responsibly. In the spirit of greater transparency in the distribution of these funds, we respectfully request that you kindly evaluate and promote these good practices from the Department of Housing's CDBG-DR Program."

PRDOH Response: PRDOH is committed to leading a responsible and transparent recovery effort. As required by 83 FR 5844, PRDOH must post information related to its CDBG-DR Grant to its website for public consumption. Information including procurement policies, contracts, Quarterly Performance Reports (QPR), expenditures, program policies and procedures, and other related information will be posted to PRDOH's disaster recovery website at www.cdbg-dr.pr.gov as it becomes available.

As mandated by HUD, PRDOH must follow HUD-approved procurement processes which encourage fair and open competition and comply with 2 CFR 200. Information regarding contracts procured by PRDOH related to its CDBG-DR grant, including contract value, start and end dates, summary of scope, and complete copies of executed contracts, is available publicly at <http://www.cdbg-dr.pr.gov/contratos/>. PRDOH has communicated comment regarding the Construimos website to the Central Office for Recovery, Reconstruction and Resilience (COR3), who is responsible for maintaining this island wide transparency portal.

Comment: #260_10-21-18_Javier Rúa-Jovet (Sunrun, Inc.)

"Attached please find photo evidence of Sunrun's filing of Comments to PR Disaster Recovery Amended Action Plan for the Use of CDBG-DR Funds, sent via the infocdbg@vivienda.pr.gov designated email.

Please confirm receipt of comments."

Attached to email: Photos

PRDOH Response: Thank you. All comments received during the public comment period are memorialized and responded to in this document.

Comment: #261_10-21-18_Carlos Mercado (Puerto Rico Trade and Commerce Company)

"The Puerto Rico Trade and Commerce Company (PR Trade) appreciates the opportunity to present comments on Puerto Rico's Action Plan for the Community Development Block Grant

funds for Disaster Recovery allocated by the Supplemental Appropriations for Disaster Relief Requirements, authorized by Public Law 115-56 and Public Law 115-72 2017; and announced through Federal Register 83 FR 5844 on February 9, 2018. The comments are made to the Substantial Amendment to the approved Action Plan.

As part of the Government of Puerto Rico, PR Trade was in the frontlines of the emergency response and the recovery. Leading the task of assisting small and medium size businesses (SMEs) around the island regain their operations was crucial to ensure access and availability of basic goods and services, particularly in low and medium income (LMI) communities, severely affected by the hurricanes. The efforts, carried by the initiative “Puerto Rico Emprende”, provided much needed direct support to SMEs to remain or reopen, reinstate their supply chain and retain jobs.

Puerto Rico’s Action Plan for the CDBG-DR funds recognized the importance of SMEs for the local economy and support is included as part of the “Economic Recovery Programs” activities. Nevertheless, planning activities must extend to the local SMEs as part of the Government efforts to promote community resiliency. Acknowledging how important is for all sectors in the community to be prepared and able to respond during and immediately after an emergency is crucial to effectively face any disasters in the future. PR Trade supports the initiatives of the Government of Puerto Rico intended to maximize the CDBG-DR funds available and contribute to this effort with the following comments to the Action Plan.

Whole Community Resilience Planning Program (Page 113)

An important lesson learned in the mist of the emergency and the recovery process, was the limited readiness and resilience capacity among local SMEs. LMI communities rely and depend on their local businesses for their everyday needs. After the hurricanes, because a significant number of small businesses were unable to operate, communities struggle to access basic needs like food, water and medical services. The Whole Community Resilience Planning Program included in the Action Plan focused on facilitating comprehensive community recovery. Since it refers to the community as a whole, PR Trade recommends including activities that also target SMEs to develop effective planning and improve their readiness and resiliency management capacity.

PR Trade is ready to support the Government goal of more resilient communities by ensuring that SMEs integrate to the Whole Community Resilience Planning program, performed risk analysis and have in place readiness and resiliency plans aligned with their communities’ particular needs. These efforts will promote job retention and access and availability of critical goods and services in emergency situations.

Small Business Incubators and Accelerators (Page 159)

Supporting the growth and success for start-ups and new businesses in the early stages of operation is important to the island’s economic development. The Action Plan includes business incubators and accelerators to support star-ups and new businesses. PR Trade urges to include export accelerators as part of the eligible activities. Assisting local businesses expand to new markets promotes business continuity, retain and create new jobs; and increase tax revenue. After the hurricanes, PR Trade provided small businesses direct assistance to accelerate their export plans and participate in export missions to remain operational during the disaster recovery

process. These actions help retain and create jobs and expose local goods and services to new markets and created new business opportunities.

Incorporating export accelerators to the Small Business Incubators and Accelerators program will be an important element to the economic recovery.

The Strategic Projects and Commercial Development program (Page 169)

The Strategic Projects and Commercial Development program is aimed at commercial rehabilitation activities and it brings commercial structures up to code or to improve their facades. PR Trade recognizes the importance of this program and recommends the investment of CDBG-DR funds in promoting preparedness and resilience among the public marketplaces (Plazas de Mercado). All municipalities have at least one public marketplace, ensuring their capacity to remain operational after a disaster with alternative energy, communications, and potable water solutions is crucial for local economies and communities.

PR Trade is ready to work with the Government to increase small business readiness and mitigation efforts, for potential future disasters, through access to solar panels, Wi-Fi services, potable water and solid waste management strategies.”

PRDOH Response: Thank you for your comments. The Community Energy and Water Resilience Installations program aims to provide renewable, sustainable energy sources, like solar, to small businesses and residences. PRDOH understands that recovery is a multi-faceted effort and will take these comments into consideration during further development of programs and program guidelines.

Comment: #262_10-21-18_Rafael Candelaria (Primera Iglesia Alianza Cristiana y Misionera de Puerto Rico)

Summary: The attachment provides an overview of the capacity of organizations from the third sector to provide valuable support to residents of Puerto Rico in the wake of disaster and expresses the organization’s desire, as a religious entity, to be involved in the recovery effort. The white paper highlights that the organization has been serving the people of Barceloneta for over 100 years and offers the following proposed initiatives to complement the recovery efforts outlined in the Action Plan:

"Initiatives presented:

The initiatives we are going to present answer the question: How can our organization help the Puerto Rican government in its effort to rebuilt Puerto Rico?

1. Psychological assistance – Psychology services have been provided by a clinical psychologist and comply with the standards and protocols of the practice of psychologists in Puerto Rico. I must point out that Barceloneta is positioned as number 27th in the qualification list related to municipalities in Puerto Rico with minor mistreatments (1). In addition, Barceloneta has been confirmed as the 7th municipality in terms of emotional abuse, to children and young people. This landscape makes emotional care essential for our children and young people. Having a program

that meets these needs, provides a framework from which you can reduce other social problems such as dropout, suicide attempts, and others.

2. *Tutoring for children and young people – We count with experienced teachers in the fields of Spanish, Mathematics and English. At the moment, we have a registration of 29 students participating in this academic assistance. The testimonies we have obtained indicate progress, raising the self-esteem of those students who are severely marked by their poor academic qualifications. Our program continues to expand its offer for the welfare of the citizens in Barceloneta.*

3. *Women's Development Program – in the face of the great need that prevails in this demographic, we want to develop a program to support and assist in the integral development of women. Barceloneta ranks as the second municipality in Puerto Rico related to the percentage of women between 10 and 19-years-old who gave birth and who were already mothers at the time of childbirth. Sadly these young mothers have a reduced range of opportunities and now have to achieve their goals with greater effort. Helping this population of young mothers not only gives them a vision for their future and goals to achieve, but we help them be more interested in obtaining the best services for their children. Puerto Rico needs to attend this population urgently.”*

PRDOH Response: PRDOH understands that recovery is a multi-faceted effort and values collaboration with the third sector. Non-profit organizations are eligible applicants for several programs outlined in the Action Plan. Thank you for your comment.

Comment: #263_10-21-18_Natalia Guzmán (Popular Inc.)

Summary: Attached to the email was a spreadsheet containing the overall CDBG-DR budget, included in the Action Plan, with comments and recommended redistribution of funding. The below table represents the comments submitted in the spreadsheet.

Item	Comments	Next Steps	Recommended Budget	Recommended Budget as % of Total Budget
Program Administration	The details of these administrative costs should be provided. Why 5%? If the Government were to hire 200 individuals and pay them \$75k a year (including benefits)--which is very attractive for Puerto Rico--the total cost for the Government for running this program would be \$15mm per year. Running the program for 6 years, the total cost would be \$90mm, which is extremely conservative given the average	Need to understand program administration needs. At a very high level, 5% seems high.	\$340,478,670	3.50%

<i>Item</i>	<i>Comments</i>	<i>Next Steps</i>	<i>Recommended Budget</i>	<i>Recommended Budget as % of Total Budget</i>
	<i>salaries in Puerto Rico. Where is the rest of the money going? Full transparency in the numbers should be provided.</i>			
<i>Whole Community Resilience Planning</i>	<i>Read CNE's Blueprint. A planning award of up to \$500k per community plan is excessive. The cap should be up to \$250k. Award should be based on population and need.</i>	<i>Determine all the communities that need resilience planning.</i>	<i>\$55,000,000</i>	<i>0.57%</i>
<i>Agency Planning Initiatives</i>	<i>Our understanding is that a GIS database already exists with the itemized data requested here. This GIS database could be purchased immediately. No need to recreate it.</i>	<i>Negotiate with the firm(s) that have this data readily available.</i>	<i>\$10,000,000</i>	<i>0.10%</i>
<i>Economic Recovery Planning</i>	<i>The Government of Puerto Rico has easily spent over \$50 million in plans throughout the last decade. We need execution instead of plans.</i>	<i>Talk to DDEC and Governor about ways to execute and budget required to hire people to execute.</i>	<i>\$0</i>	<i>0.00%</i>
<i>Home Resilience Innovation Competition</i>	<i>Ok.</i>	<i>n/a</i>	<i>\$5,750,000</i>	<i>0.06%</i>
<i>Other Planning</i>	<i>What is the Description of this Item?</i>	<i>Until further details are provided, this item should be \$0.</i>	<i>\$0</i>	<i>0.00%</i>
<i>Land/ Property Banking</i>	<i>NEW. Funds should be available to purchase blighted properties and land that can be reused and repurposed for better and higher uses.</i>	<i>-</i>	<i>\$200,000,000</i>	<i>2.06%</i>

<i>Item</i>	<i>Comments</i>	<i>Next Steps</i>	<i>Recommended Budget</i>	<i>Recommended Budget as % of Total Budget</i>
<i>Single Family Home Repair, Reconstruction or Relocation</i>	<i>Eligibility threshold for substantially damaged should be revised. If the repairs exceed \$60k, and the cost to make it livable again is \$70k, it makes more sense to do rehab than total reconstruction. Recommendation is to require that the housing units are built utilizing vacant units and blighted buildings.</i>	<i>Add flexibility to substantially damaged threshold. Prioritize projects in urban centers and existing neighborhoods throughout the island.</i>	<i>\$2,175,570,050</i>	<i>22.36%</i>
<i>Title Clearance Program</i>	<i>Title clearance can already be provided via a "declaración jurada". The required need is to ensure that people register properties properly. Gear the funds towards ensuring that people register their units and pay the required fees.</i>	<i>Identify non-profits or for-profits that can provide fiscal oversight, ensuring that the majority of housing units have title.</i>	<i>\$15,000,000</i>	<i>0.15%</i>
<i>Rental Assistance Program</i>	<i>If the Government wants to really help low-income people for the next 24 months, this item needs to be much higher. Just in Act 173 units, the Government's budget is about \$14 million per year. It's imperative that the Government provides funds, either through federal or local funds, to ensure these individuals keep receiving rental subsidies.</i>	<i>Determine reasonable action plan to ensure low-income individuals at risk of not having a home because of lack of rental subsidies.</i>	<i>\$35,000,000</i>	<i>0.36%</i>
<i>Mortgage Catch-up Program</i>	<i>Ok.</i>	<i>-</i>	<i>\$100,000,000</i>	<i>1.03%</i>
<i>Social Interest Housing</i>	<i>At a cost of \$150k per unit, this budget would provide for only 217 housing units for homeless, battered women, and other people with special needs. This number is too low.</i>	<i>Increase budget. Work with non-profits to maximize the number of units needed.</i>	<i>\$50,000,000</i>	<i>0.51%</i>

<i>Item</i>	<i>Comments</i>	<i>Next Steps</i>	<i>Recommended Budget</i>	<i>Recommended Budget as % of Total Budget</i>
<i>Housing Counseling Program</i>	<i>Ok.</i>	<i>-</i>	<i>\$17,500,000</i>	<i>0.18%</i>
<i>CDBG-DR Gap to LIHTC</i>	<i>The \$100MM provided to fill the gap for the 9% LIHTC projects might not be enough to make the 11 projects viable that have been waiting 2 years to begin construction. The \$300MM provided on the second allocation would provide for approximately 6,000 new or rehabilitated housing units. Based on language on page 139, it seems that the Government is considering using these funds to provide loans, which as mentioned in other parts of this table, is unnecessary given non-governmental banks availability to fund. Recommendation is to require that the housing units are built utilizing vacant units and blighted buildings. In addition to using the CDBG-DR to fill the gap for LIHTC, approximately \$200mm should be segregated for small projects that can be funded with CDBG-DR only.</i>	<i>Maximize existing available Volume Cap of approximately \$350mm annually. Increase CDBG-DR to provide for over 10,000 new or rehabilitated low-income multifamily units. Prioritize projects in urban centers and existing neighborhoods throughout the island.</i>	<i>\$600,000,000</i>	<i>6.17%</i>
<i>Multifamily Construction (non-LIHTC)</i>	<i>NEW. This would provide the funds for non-profits and specific communities build small projects to fulfill the low-income housing needs, particular in town centers.</i>		<i>\$150,000,000</i>	<i>1.54%</i>
<i>Community Energy & Water Resilience</i>	<i>Ok. Low-income families should be allowed to use these funds to rebuild their houses so that they</i>	<i>-</i>	<i>\$436,000,000</i>	<i>4.48%</i>

<i>Item</i>	<i>Comments</i>	<i>Next Steps</i>	<i>Recommended Budget</i>	<i>Recommended Budget as % of Total Budget</i>
	<i>can have utilities at all times independently.</i>			
<i>Multifamily Reconstruction, Repair & Resilience</i>	<i>Ok. Could it be could combined with 4% LIHTC as well?</i>	-	<i>\$300,000,000</i>	<i>3.08%</i>
<i>Pre-Development Funds</i>	<i>NEW. This would provide funds for non-profits and specific communities to invest the pre-development funds necessary to pursue housing projects. A non-profit such as FIDEVI could manage the distribution of these funds.</i>	-	<i>\$12,500,000</i>	<i>0.13%</i>
<i>Homebuyer Assistance</i>	-	-	<i>\$150,000,000</i>	<i>1.54%</i>
<i>Small Business Financing</i>	<i>The Government of Puerto Rico should not be providing financing when the non-governmental banks are more than willing and able to provide financing. Why would the Government want to allocate precious federal funds for these purposes when non-governmental banks can provide them? Consider providing part of these funds to fund CDFI Funds and non-profits who are always seeking for additional capital to provide exactly what this program seeks. Small businesses and non-profits need equity. These funds should be used to fulfill the equity needs of small businesses and non-profits, and fund CDFI Funds or other entities that have the capacity to provide this sort of lending.</i>	<i>Determine CDFI Fund, Small businesses, and non-profits equity needs. For now keep at \$200mm, but with new uses.</i>	<i>\$200,000,000</i>	<i>2.06%</i>

<i>Item</i>	<i>Comments</i>	<i>Next Steps</i>	<i>Recommended Budget</i>	<i>Recommended Budget as % of Total Budget</i>
<i>Small Business Incubators & Accelerators</i>	<i>Consider increasing max grant amount to \$5mm. Some of the existing incubators have had a lot of success and could make more impact with a higher grant.</i>	-	<i>\$70,000,000</i>	<i>0.72%</i>
<i>Workforce Training Program</i>	<i>Workforce training is one of the most important needs of Puerto Ricans. The amount proposed is nothing compared to the need. The Boys and Girls Club alone could use over \$100mm for workforce development. It's important to maximize this amount.</i>	<i>Identify other nonprofits and for profits focused on workforce training programs to determine need.</i>	<i>\$200,000,000</i>	<i>2.06%</i>
<i>Construction & Commercial Revolving Loan</i>	<i>The Government of Puerto Rico should not be providing financing when non-governmental banks are more than willing and able to provide financing. Why would the Government want to allocate precious federal funds for these purposes when the non-governmental banks can provide them? Ok to allocate funds for capacity building. No funds should be allocated for financing. If non-governmental banks can't provide the financing, then the firm probably doesn't deserve the financing in the first place.</i>	<i>Determine specific needs for capacity building. Recommending \$10mm for now.</i>	<i>\$10,000,000</i>	<i>0.10%</i>
<i>Re-Grow PR; Urban and Rural Agriculture</i>		-	<i>\$100,000,000</i>	<i>1.03%</i>
<i>Tourism & Business Marketing Program</i>	-	-	<i>\$115,000,000</i>	<i>1.18%</i>
<i>Strategic Projects and</i>	-	-	<i>\$50,000,000</i>	<i>0.51%</i>

<i>Item</i>	<i>Comments</i>	<i>Next Steps</i>	<i>Recommended Budget</i>	<i>Recommended Budget as % of Total Budget</i>
<i>Commercial Redevelopment</i>				
<i>Economic Development Investment Portfolio for Growth</i>	-	-	\$800,000,000	8.22%
<i>Critical Infrastructure Resilience</i>	-	-	\$700,000,000	7.20%
<i>Community Resilience Centers</i>	-	-	\$75,000,000	0.77%
<i>FEMA Coordination</i>	-	-	\$1,000,000,000	10.28%
<i>City Revitalization</i>	<i>Prioritize putting cables underground in all key urban centers.</i>	-	\$1,200,000,000	12.34%
<i>Puerto Rico by Design (PR Design Build)</i>	<i>Unclear. How will the funds be distributed? As grants to the winning projects?</i>	<i>Clarify use. Lowered to balance budget.</i>	\$555,163,280	5.71%
			\$9,727,962,000	100.00%
<i>All Programs Subtotal</i>			\$9,316,733,330	

PRDOH Response: Thank you for the thorough analysis of funding allocation. PRDOH is committed to leading a fiscally responsible and transparent recovery. Information including procurement policies, contracts, Quarterly Performance Reports (QPR), expenditures, program policies and procedures, and other related information will be posted to PRDOH's disaster recovery website at www.cdbg-dr.pr.gov as it becomes available. PRDOH looks forward to collaborating with stakeholders throughout the life of the grant.

83 FR 5844 and 83 FR 40314 allow for a maximum of 5% of the total grant to be expended on program administration costs and up to 15% for planning costs. PRDOH will take these comments into consideration during further development of programs or during the development of new programs, if additional funding becomes available.

Comment: #264_10-21-18_Jenifer De Jesús (Organización Taller Salud)

Summary: The email attachment includes a description of Taller Salud as a feminist, community-based organization that is “dedicated to improving women's access to health, reduce violence in community settings and encourage development economic through education and activism”. The attachment offers the following specific commentary on the Action Plan.

Comments:

"Women in Puerto Rico represent 52% of the population. The current Puerto Rican family composition is mostly headed by women. 56% of Puerto Rican children live under poverty levels due to lack of employment of their parents. On average, women in Puerto Rico earn \$3,000 per year less than men when they have a job. According to statistics, women are the main victims of sexual assault and gender violence; both in dramatic increase. Due to the traditional roles that women have been assigned throughout history, they assume the care of children, sick family members, the elderly and their community. After the passage of hurricanes Irma and Maria also lost their homes, jobs and relatives, after the closure of 283 schools also transport children to more distant schools. The situation of women in Puerto Rico reflects enormous unmet needs in all areas of daily life.

Required action:

1- Establish protocols with a gender perspective for data analysis, project planning, qualification of beneficiaries and the implementation of public policy.

2- That projects are produced aimed at addressing the situation of inequality and vulnerability of women with priority.”

PRDOH Response: PRDOH is committed to serving impacted residents of Puerto Rico, including women. Program implementation will be conducted in a manner which will not cause discrimination on the basis of race, color, religion, sex, disability, familial status, or national origin.

“On page 7 of the draft of the Action Plan Spanish version, the 3 main causes of deaths after Hurricane Maria are presented. It is indicated that the third cause of death in Puerto Rico was the lack of access to health services.

Required action:

- *Rebuild, repair and mitigate the vulnerabilities presented in the 69 hospitals in Puerto Rico and expand to other facilities that provide critical health services such as dialysis centers, cancer treatment centers, delivery centers, centers that can guarantee conditions for asthma treatments, centers for early detection of preventable and terminal diseases, centers with sexual and reproductive health services, centers for services to people living with HIV, and health centers to meet the needs of the transgender community.*
- *Equip all health service facilities with renewable energy, with water cisterns, filtration or water purification systems and resistant communications systems. Taking these measures ensures that life is preserved even in an emergency situation.”*

PRDOH Response: The Critical Infrastructure Resilience program aims to fund the rebuilding, hardening, improving of critical infrastructure, which may include hospitals or healthcare facilities.

"Official data indicates that 81% of FEMA's post-disaster aid applications were denied. The appeals processes were confusing and unreasonable for people. The continued denial of aid to people degrades the physical and emotional health of those who have lost their belongings beforehand, means to satisfy their basic needs, the schools of their children and the separation of family nuclei either by migration or by death of members.

Required action:

1- Publish and disseminate in Spanish and effectively all the criteria, requirements, deadlines and options that the population has to access Dignified Housing, in order to minimize bureaucracy.

2 - That all criteria, requirements, deadlines and options are established based on the premise that you have the right to a decent home, that the situation of poverty is the result of the combination of factors of public policies, planning failures and implementation of projects and social marginalization. That the CDBG-DR funds be used to guarantee access to better conditions instead of resulting in the punishment of "informal housing and poverty."

PRDOH Response: Denial for FEMA or other assistance does not disqualify one from participating in programs outlined in the Action Plan. Eligibility criteria for each program is available in Spanish and English in the Action Plan. Further information such as program start dates and application deadlines will be published in Spanish and English at www.cdbg-dr.pr.gov, when it becomes available.

"The period of comments to the Plan of Action and the Public Opinions occurred in parallel, this resulted in a limitation for citizen participation, the real participation of citizens. We find it imprudent and hasty on the part of HUD to pretend that the citizens of Puerto Rico have the time available to carry out these actions at the same time in order to participate: 1) read an Action Plan of more than 250 pages 2) carry out community education efforts to discuss and be able to respond, comment and propose to the plan 3) organize to respond, comment and make proposals to the Plan 4) write papers 5) Attend public hearings. We demand that different dates be given to the participation processes and that the time of the communities be prioritized to allow a real process of just recovery.

During the Public Hearings, more time was given to the mayors and mayors than to the leaders of their communities, or people from community organizations. We believe that it is unfair to grant more time for participation to mayors and mayors than that given to community leaders, to participate in a fund called Community Development Block Grant. We understand that both the people who reside in the communities -who do the work voluntarily- have the same or more right to participate than people who occupy public positions, because they are the ones they talk about when projects are proposed. In addition, Public Hearings must be done in places that facilitate the participation of people, contemplating available transportation, facilities with access to people with functional diversity, among other elements that guarantee inclusion."

PRDOH Response: Thank you for the comment. As required by 83 FR 40314 and in accordance with commitments made by PRDOH, the substantial amendment to the Action Plan was posted for 30 days. PRDOH worked with numerous community groups, agencies, non-profit organizations and other stakeholders to distribute information regarding the substantial amendment to the Action Plan and its public comment period. All attendees of public hearings were given an option to make an oral presentation, regardless of title. Each person who opted to speak was allotted five minutes to present.

"We understand that many of the projects proposed by the Municipalities lack feasibility mechanisms. They are ambiguous in terms of the processes involved in these projects with the local communities in which they are contemplated. Questions like: who is affected by the proposed projects? How are they informed that they will be affected to guarantee their participation in the fair recovery processes? There are some that show ambiguity, which could result in lack of participation and violation of rights."

PRDOH Response: Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors. Municipalities must submit applications for consideration and approval by PRDOH after the program begins.

"Not only should the local labor force be hired over the foreign one for the projects of the Action Plan, but it should be guaranteed. In areas where there is not enough skilled labor, we want training for the local workforce. This guarantee must be long-term, so we are prioritizing the local human resource - who has a country context and a preparation adjusted to local needs - in addition to betting on local economic development on the economy of the visitor."

PRDOH Response: As mandated by HUD, PRDOH must follow HUD-approved procurement processes which encourage fair and open competition and comply with 2 CFR 200.

"In the municipality of Loíza, given the general danger of communities in flood zones, it seems important to recommend that no new construction be carried out until: 1) The Risk Mitigation Plan is completed, which also requires, by regulation, participation community (we do not understand how an Action Plan already exists when the study has not been completed to carry out and be able to count on the Risk Mitigation Plan), 2) Dredging is carried out in sector 23 and 3) The arrangement is completed/installation of sewerage systems (with pumping) and relevant sewage to address flood threats with any event involving heavy rains or storm surges. These actions allow us to take a conscious process with nature, recognizing that everything we do has an effect on the environment and taking into account that sea level continues to increase steadily. No new constructions should be proposed until the problem of drainage and sewerage is solved. We reiterate our commitment to the integral health of Puerto Rico and we know that it is only achieved when there is a balance and access to the satisfaction of social determinants. Access to decent housing, to health services, education of excellence with a gender perspective, with concepts of sustainability, with access to information, with real work opportunities, with the care and protection of our environment and resources, free from discrimination, and free of violence, both individual and state."

PRDOH Response: Thank you for your comment. PRDOH will take these comments into consideration during further development of programs or during development of new programs if additional funding becomes available.

Comment: #265_10-21-18_Mekela Panditharatne (Natural Resources Defense Council (NRDC))

“The Natural Resources Defense Council (NRDC) appreciates the opportunity to review and comment on the Draft Puerto Rico Disaster Recovery Plan (“Recovery Plan”). The NRDC is a national membership organization with over 3 million members and online activists, including members in Puerto Rico, dedicated to addressing environmental harms and social inequities. Please find comments on referenced programs below.

Housing Programs (pg. 126)

NRDC commends the plan for acknowledging the significant numbers of Puerto Ricans who may have been erroneously denied assistance for housing repair under the Individual Assistance program, and for considering alternative methods of documenting ownership. We recommend that locals with strong Spanish language proficiency be hired to conduct inspections to evaluate housing damage. Staff should be rigorously trained so that evaluation standards are applied consistently, and information is accessible. Protocols for damage evaluation should be transparent. Declarative statements signed under penalty of perjury should also count toward meeting FEMA’s standards to show contemporaneous occupancy in addition to notarized affidavits.”

PRDOH Response: Housing programs outlined in the Action Plan will use traditional and non-traditional methods of proving ownership for purposes of program eligibility. In addition, the Title Clearance program aims to assist homeowners in clearing title issues. Spanish language proficiency of program staff is important to PRDOH to ensure fair access to assistance.

“Home Repair, Reconstruction, and Relocation Program (pg. 125)

NRDC strongly supports this proposed action. As sea levels rise and extreme coastal storms become more likely, the risk of flooding will increase dramatically. Ensuring hurricane-damaged housing, located in flood and mudslide zones, is relocated or redesigned with consideration of this risk will help to improve Puerto Rico’s resilience to future large-scale events. Providing assistance to eligible homeowners to buy or build new homes in safer locations is a sound approach for ensuring such Puerto Rican citizens are not placed back into a situation of vulnerability.

In general, NRDC supports the two option approach for helping impacted homeowners relocate outside of high-risk floodplains. However, Option 1 (pg. 128) lacks clarity as to whether redevelopment would be permitted on the purchased land. In contrast, Option 2 clearly states “damaged properties acquired by PRDOH will be demolished and vacant lots will be maintained as open space.” If such a criterion applies to Option 1, the Action Plan must make this clear. If such a criterion is not applicable to Option 1, then this is an unacceptable approach as permitting redevelopment would result in infrastructure being placed in areas that are known to be high-risk.”

PRDOH Response: Thank you for your support. Damaged properties acquired by PRDOH under both option 1 and option 2 for relocation will be maintained as green space. The Action Plan has been updated to clarify this point.

“Community Energy and Water Resilience Program (pg. 143)

In addition to water catchment systems, water security and resilience can be enhanced at modest cost if the voucher program included water-efficient toilets, faucets, and showerheads to replace legacy plumbing fixtures in the homes of eligible participants. US EPA WaterSense certification provides performance benchmarks to ensure that labeled products save water while meeting consumer expectations for performance.

Moreover, the true scope of Puerto Ricans experiencing water insecurity is not well known. This is particularly true in rural and remote areas, served by small water systems. NRDC recommends that FEMA make eligible for funding an independent inventory of hurricane damage to non-PRASA water systems, and related costs, and investigate the viability of connecting isolated communities to nearby, larger municipal water systems. NRDC recently obtained the results of an assessment of 237 small, independent water systems conducted by EPA after Maria. These assessments were conducted in November and December 2017. Nearly half of the small systems—at least about 48 percent of those that reported—suffered from a significant deterioration in operational capacity several months after the storm, in some cases leading to a total inability to deliver water to residents. However, there was a wide degree of variability in the level of detail in reporting hurricane-related damage. Many systems did not comprehensively report damage or operational capacity.

We recommend that the Puerto Rico government contract an independent inventory of hurricane damage to non-PRASA water systems and related costs to remedy water security issues, and investigate the viability of connecting isolated communities to nearby, larger municipal water systems.

Multi-Family Reconstruction, Repair, & Resilience Program (pg. 146)

Housing affordability is improved when appliances and fixtures are energy- and water-efficient. The program description does not state how multi-family buildings would be made more resilient, nor the performance standards to be applied to eligible projects. US EPA WaterSense certification of toilets, faucets, and showerheads provides performance benchmarks to ensure that labeled products save water while meeting consumer expectations for performance, and should be required for eligible projects.

NRDC applauds the plan’s recognition that “high denial rates have left hundreds of thousands without critical assistance and a large unmet housing need.”

PRDOH Response: Thank you for the comment. PRDOH will take these comments into consideration during further development of the Community Energy and Water Resilience Installations and Multi-Family Rehabilitation, Reconstruction, and Resilience programs.

“Critical Infrastructure Resilience Program (pg. 180)

This proposed action is laudable as municipal-owned critical infrastructure should be made more resilient to future disasters, such as flooding. However, the proposed action must be fleshed out in greater detail to ensure CDBG-DR funds are spent effectively. The proposed action requires more specifics on how resiliency would be achieved, such as the standards to which such infrastructure would be rebuilt and how future conditions, like sea level rise, would be considered.

NRDC recommends that formal design specifications for critical infrastructure that could ensure a higher margin of safety against future flood risk be utilized. For example, critical infrastructure should be rebuilt so that it is elevated or flood-protected to either (a) three feet above the 100-year flood elevation, (b) above the 500-year flood elevation, or (c) to an elevation that accounts for future projections of sea level rise and the resulting flood risk over the lifetime of the project.

However, NRDC acknowledges such details may be finalized after Puerto Rico concludes discussions with the Federal Emergency Management Agency regarding funding for public infrastructure repair.

NRDC additionally recommends that FEMA consider funding independent evaluations of resiliency-building infrastructure improvements for drinking water and wastewater systems as part of the initial disbursement of infrastructure funds. Local government should be encouraged to apply for funding for an independent engineering firm with expertise in drinking water regulatory compliance to evaluate water systems. The firm should assess water and wastewater systems, provide a list and cost itemization of projects necessary to ensure compliance with federal drinking water safety standards and to target infrastructure investments to longer-term resilience.”

PRDOH Response: Thank you for your suggestions. PRDOH will take these into consideration during further development of the Critical Infrastructure Resilience program.

“Puerto Rico by Design (pg. 188)

NRDC is highly supportive of the proposed action: Puerto Rico by Design. As the acknowledged by the Action Plan, similar competitions have been conducted by the United States’ Department of Housing and Development, which have generated highly innovative design solutions for reducing the vulnerability of multiple communities to future disasters. Additionally, such competitions have produced multiple cross-sector benefits, and a competition tailored to Puerto Rico’s unique risks and opportunities would likely have the same impact.

NRDC commends Puerto Rico’s ambition to generate “shovel-ready” projects through the competition by the beginning of 2020. NRDC recommends that Puerto Rico Department of Housing contact Amy Chester at the organization Rebuild By Design, if it has not done so already, and secure that organization’s assistance in designing such a competition for Puerto Rico.”

PRDOH Response: Thank you for your support and suggestions.

Comment: #266_10-21-18_Marianne Ramírez Aponte (Museo de Arte Contemporáneo de Puerto Rico)

“As a note on the outlined section for Economic Recovery Programs contained in the draft for the Puerto Rico Disaster Recovery Action Plan, the Museo de Arte Contemporáneo de Puerto Rico (MAC) would like to highlight the value of arts and culture as essential tools that can be leveraged for recovery efforts as well as for long-term economic development in Puerto Rico. Investing in our cultural infrastructure serves the dual purpose of stimulating local business activity throughout various communities and supporting a thriving visitor economy by enhancing Puerto Rico’s position as a global destination.

In the aftermath of Hurricane Maria, the MAC has recognized the profound impact that a coherent action plan involving arts and culture has on the economic recovery of affected communities. Empowering this sector is key in establishing resiliency and revitalizing local economic activity that can translate tangibly into exportable cultural products, but also supports marketing strategies that promote Puerto Rico as a competitive destination. Puerto Rico’s cultural capital should be recognized an indispensable asset to the tourism sector and the visitor economy and thus contemplated as a valuable component of any economic development strategies implemented. On behalf of Puerto Rico’s cultural organizations and creative industries suggests that the CDBG Action Plan Draft for Public Comment issued on September 21, 2018 be further amended as follows in recognition of the contribution this sector can make in the island’s recovery:

Strategic Projects and Commercial Development Include arts and cultural economic development projects as an additional “Program Accomplishment” and allocation additional funds to ensure that funding for additional projects will be available.

City Revitalization Program Include arts and culture-related activities as activities incorporated within the revitalization goals of this program. The current Program Objectives includes “improvements to public space (plaza, town squares), cultural and art installations. Specific funding should be set aside for direct funding to nonprofit cultural institutions to carry out these activities.

About the MAC: The Museo de Arte Contemporáneo de Puerto Rico (MAC) is an artist-founded, collecting art institution located in the Santurce neighborhood of San Juan. It is devoted to the study, documentation, collection, preservation and promotion of art produced since the mid-20th century in Puerto Rico, the Caribbean and Latin America and by their respective migrations. The MAC has developed and implemented a wide range of community-based art and culture initiatives to bring cultural equity to economically vulnerable communities.”

PRDOH Response: Thank you for your comment. PRDOH will take these into consideration during further development of the referenced programs. Non-profit entities are eligible to apply for funding under several programs outlined in the Action Plan.

Comment: #267_10-21-18_Millie Marcano (Municipio Naguabo)

“Comment submitted is a version of the presentation given during public hearings, which represents several programs the municipality of Naguabo is interested in pursuing. Also attached is a copy of the proposal submitted on March 7, 2018. The March 7 proposal was reviewed and

responded to in the appendices of the initial submission of the Action Plan. Projects suggested in the new proposal include:

- *Rehabilitation of homes*
- *Acquisition of homes that are not compliant with code*
- *Asphalt in different sectors of the Municipality of Naguabo.*
- *Rehabilitation of the Public Square.*
- *Rehabilitation of the Malecón Kiosks.*
- *Rehabilitation of the Malecon.*
- *Reconstruction of the Fishing Village in the Húcares neighborhood.*
- *Reconstruction of the Fishermen's Wharf in the Húcares neighborhood.*
- *Reconstruction of the Benigno Ramos Coliseum.*
- *Reconstruction of Adolfo Carrillo Park.*
- *Rehabilitation of 12 basketball courts in various sectors of different neighborhoods.*
- *Reconstruction of the Barrio Daguao Community Center.*
- *Rehabilitation of the Ismael García Ball Park.*
- *Construction of El Malecón Parador in the old Faustino R. Fuentes School.*
- *Acquisition of the Malecón Castle for economic development.*
- *Construction of the Gabion Wall on the Rio Blanco River, Sector Cubuy, PR-191.*
- *Construction of Gabion Wall in the Daguao River.*
- *Construction of Gabion Wall in the Los Viudos River of the Mariana Neighborhood.*
- *Construction of Gabion Wall in the Pueblito de Los Perros Sector in Barrio Duque.*
- *Construction of the Gabion Wall in the La Residencia Sector, Barrio Peña Pobre.*
- *Improvements to the Canal de la Urb. Río Blanco Heights, Río de Las Gallinas of the Río Blanco neighborhood.*
- *Construction of a Containment Wall in Caño La Cambimbora.*
- *Rehabilitation of the Mayor's Office.*
- *Rehabilitation of the Municipal Theater.*
- *Rehabilitation of the Acoustic Court (next to the Public Square).*
- *Construction of a floating bridge in the Malecón area.*
- *Linear walk and kiosks.*
- *Reconstruction of Kiokos in Tropical Beach.*

- *Improvements to the Malecon.*
- *Construction of sidewalks in the residential area of PR-31 near OMME.*
- *Linear walk construction that connects the Runway with the Benigno Ramos Coliseum.*

PRDOH Response: Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for Municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

In addition, the proposal lists specific commentary regarding the draft substantial amendment to the Action Plan. Commentary regarding the Action Plan is as follows:

"After reviewing the first amendment of the Action Plan, we request:

- *That the unmet needs of our citizens be met.*
- *Active participation of the municipality in the implementation of the programs.*
- *Ownership of the participants (What documents will be accepted?)*
- *We understand that the programs are of vital importance for the recovery of Puerto Rico.*
- *We request that housing rehabilitation, municipal infrastructure and*
- *commercial renewable energy (water, electricity and any efficient energy model).*
- *Other comments that the mayor deems necessary."*

PRDOH Response: Programs outlined in the Action Plan are not geographically restricted within Puerto Rico. Residents of Naguabo may be eligible to receive assistance. PRDOH will use traditional and non-traditional methods of verifying property ownership. Information regarding specific documents which will be accepted to prove ownership will be included in program guidelines. In addition, the Title Clearance program provides assistance to homeowners in obtaining clear titles.

The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. The Community Energy and Water Resilience Installations program aims to provide sustainable, renewable energy to residences and small businesses.

PRDOH values a positive working relationship with municipios and looks forward to working with them to serve the people of Puerto Rico throughout the life of the recovery process. Thank you for your comment.

Comment: #268_10-21-18_Millie Marcano (Municipio Las Piedras)

Summary: Attached to the email is a version of the presentation given during public hearings, which represents several programs the Municipality of Las Piedras is interested in pursuing.

Projects suggested in the proposal include:

- *Repair, reconstruct or relocate homes in Las Piedras*
- *Acquisition of homes that are not compliant with code*
- *Creation of rental housing*
- *Rehabilitate urban area*
- *Rehabilitate public plaza*
- *Improvements to road and pedestrian infrastructure*
- *Reconstruct emergency management center*
- *Canalize bodies of water*
- *Sanitary sewers and pluvial systems*

PRDOH Response: Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for Municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

In addition, the proposal lists specific commentary regarding the draft substantial amendment to the Action Plan. Commentary regarding the Action Plan is as follows:

"After reviewing the first amendment of the Action Plan, we bring to your attention: There are still many residences in our Municipality that could not be rebuilt or rehabilitated in its entirety. The response from FEMA, although in some effective situations, in another due to lack of ownership and others, has not paid off for our citizens. The Tu Hogar Renace program was a relief for many, but it did not cover all the needs. The population of medicines, the economically disadvantaged population have not been able to fully rehabilitate their homes. Activity in the Urban Case fell as a result of the flight of businesses due to energy complications. That is why we bring before your consideration the most relevant points for us:

- *Active participation of the municipality in the implementation of the programs.*
- *Fulfillment of the unmet need of our citizens.*
- *Documents that will be accepted as part of the ownership of the dwellings.*
- *We request the inclusion of housing rehabilitation, municipal infrastructure and commercial, renewable energy (water, electricity and any efficient energy model)."*

PRDOH Response: Programs outlined in the Action Plan are not geographically restricted within Puerto Rico. Residents of Naguabo may be eligible to receive assistance. PRDOH will use traditional and non-traditional methods of verifying property ownership. Information regarding specific documents which will be accepted to prove ownership will be included in

program guidelines. In addition, the Title Clearance program provides assistance to homeowners in obtaining clear titles.

The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. The Community Energy and Water Resilience Installations program aims to provide sustainable, renewable energy to residences and small businesses.

PRDOH values a positive working relationship with municipalities and looks forward to working with them to serve the people of Puerto Rico throughout the life of the recovery process. Thank you for your comment.

Comment: #269_10-21-18_Ariadna Michelle Godreau Aubert (Ayuda Legal Puerto Rico)

Summary: The following comments are presented by Ayuda Legal of Puerto Rico. Comments were prepared and compiled by this group to include the input of people, communities, groups and organizations that are Community Participants CDBG-DR. Their motivation is to promote and facilitate the space for education, participation and advocacy means that result in the protection of decent housing and just recovery.

Comments were organized into three parts:

- *Recommendations on the rights of the people affected by Hurricanes Irma and Maria that need to be included in the finalized Action Plan.*
- *Detailed comments on the various programs included within the Draft Amended Action Plan (BPA)*
- *Final Recommendations.*

"Recommendations on the rights of the people affected by Hurricanes Irma and María that should be included in the final Plan.

Required Action: Include the rights listed below in the Action Plan and use them as guiding principles for the plans that the Government of Puerto Rico proposes from the CDBG-DR funds

1. Right to decent housing- This right includes the enjoyment of a safe, accessible, adequate, dignified and community housing.

2. Right to real and effective participation - There is a right to participation in long-term recovery in a direct, real and effective way. When vulnerable communities are not part of the government's plans, their needs are ignored and they risk being displaced. To safeguard their right to a decent life and housing, participation is essential. This includes the real possibility of obtaining information, commenting, going to public hearings, being really heard or heard in these, and being part of the processes related to CDBG-DR funds and other post-disaster recovery processes.

The highest standard of accessibility must be considered so that populations with functional diversity can participate, in accordance with the provisions of local and federal regulations.

3. Right to remain - People affected by the disaster have the right to remain or return to their communities, as long as they are safe and livable. We define safe and habitable as those homes and communities to which they have been given a real, participatory and reasonable opportunity to mitigate the damages suffered by the disaster. Mitigation should always be considered as the first alternative to relocation.

When the relocation of communities and individuals is necessary, the government must give priority to maintaining the integrity of the community, respecting geographical proximity and special needs that may exist.

4. Right to decide - The right of individuals and communities to decide where they want to live must be respected. This includes the responsibility of the government and its contractors to promote community participation and prior consent informed of relocation, relocation and eviction proposals. Communities have the right to make decisions about their future lives and the reconstruction of the country.

5. Right to equal treatment and freedom from discrimination- The government of Puerto Rico must guarantee fair, equal and non-discriminatory treatment to affected persons by providing adequate assistance throughout the recovery process. This includes the long-term recovery of their communities. Through a dignified and just recovery, each community and person must be treated without distinction because of race, sex, sexual orientation, gender identity, age, functional diversity, social condition, national origin or other classification. Equal treatment should be ensured in the achievement of projects aimed at flood protection and, equally, fair treatment in the implementation of housing, infrastructure and economic revitalization projects.

The government of Puerto Rico must assume a proactive role in the protection and defense of the rights of historically vulnerable groups and identities such as the elderly, women, impoverished communities, people with functional diversity, LGBTTIQ communities, homeless people, immigrants and others

6. Right to a healthy environment- Reconstruction and recovery must minimize the environmental impact. The focus should be on improving the quality of life of the most disadvantaged communities and those most impacted by the hurricane disaster. Living on a tropical island exposes us to greater consequences of global warming. The recovery must take into account the right to a sustainable and conscious development of the current state of the environment."

PRDOH Response: PRDOH values your feedback and has taken your comments and suggestions into careful consideration. All relocation contemplated in the Action Plan is voluntary. Program implementation will be conducted in a manner which will not cause discrimination on the basis of race, color, religion, sex, disability, familial status, or national origin.

"II. General comments

1. Lack of real and effective citizen participation

Required Action: Make available an official translation of the first Allocation Notice (AN) to Spanish and information on other matters related to CDBG-DR funds to ensure effective communication about the program to communities, as well as extensive notification of availability and Eligibility criteria for these funds.

Action required: Hold separate public hearings of the period to submit comments to the BPA-E so that the communities have enough time to evaluate whether the programs presented in the BPA-E effectively respond to their housing, infrastructure and revitalization needs economically, and can access and participate effectively in both processes.

The AN establishes the requirements for citizen participation and the publication of the action plan. We acknowledge that the Housing Department (PRDOH) has listened to the complaints we have presented and that to that end, the comment period was increased to 30 days (instead of 14) and new public hearings were held. We understand that these are steps in the right direction.

Adequate participation includes accessibility of the language.¹ However, the first AN, dated February 9, 2018, was not translated into Spanish, so its content - particularly regarding the criteria with which the Department must comply of Housing (PRDOH) in their plan - they have not been published in a format and language accessible to the general population. Thus, any attempt to participate in the CDBG-DR funds is ineffective. There are also no educational materials on the AN in Spanish and the material available on the CDBG-DR page of the PRDOH that has been translated from English is extremely short.

The AN requires notification to the affected citizens prior to the publication of the B-PA. The PRDOH has kept the publications and information notifications of the process through its online portal. It is not a timely, effective and adequate notification to notify citizens in general about the process of the funds - process of comments and public hearings - only through online notification platforms or methods. The broad campaign that the PRDOH has made on the platform "We build" demonstrates the possibility of the agency to access other media channels such as radio, press and television.

It was not until after the BPA-E was published, and within the term of thirty (30) days of comments, that the public was informed of the holding of public hearings, which were held in this same period. The real and effective participation of civil society in general and of vulnerable communities is not promoted if two participatory processes are organized that conflate. It is an onerous burden to educate you on a highly technical and extensive action plan. Adding the presentation of comments as well as the preparation of papers for public hearings within the same term nullifies the actual participation."

PRDOH Response: The public hearing process was open to the public and resulted in a wealth of information exchanged. Hundreds of submittals from the public were received. Although each proposal may not have been referred to by name in the Action Plan, all submittals have been reviewed carefully by PRDOH and were considered in the development of the plan. Notification of public hearings was advertised on social media, in the newspaper, and in circulated newsletters, in addition to being posted on the PRDOH website, www.cdbg-dr.pr.gov.

PRODH has requested that HUD provide the Federal Register notice in Spanish. PRDOH welcomes collaboration regarding outreach strategies.

"The data used as a basis for BPA-E are not adequate

Required Action: Identification of unmet needs through census data collected by community leaders

The sources used to support the identification of needs discovered in the BPA-E are inadequate and insufficient. Some of the main sources of BPA-E are FEMA, SBA and the Rebuilding Better Report of the government of Puerto Rico. Predictably, the most emphasized data are those provided by FEMA. While the norm is to use this information, we are not convinced that it is the "best available data" in accordance with HUD regulations."

PRDOH Response: Thank you for your comment. The unmet needs assessment included in the substantial amendment to the Action Plan was developed in accordance with guidance in 83 FR 5844 and updated in accordance with 83 FR 40314, using best data available. A description regarding methodology used to calculate unmet needs is included in the Action Plan and a complete list of data sources, including census data, is included in the appendices.

"Transparency

Required Action: Continuous and updated transparency exercise.

Action Required: Publication of the entities that will manage the programs of the final action plan and their work to carry out the programs, as well as the qualifications to select them.

Action Required: Publish a guide of clear eligibility criteria so that citizens can know how, when and where to access the different assistance programs that promotes the programs.

Required Action: Publish the calls for proposals, contracts and subcontracts related to the CDBG-DR funds in a timely manner and accessible to the general public. As part of the process of the CDBG-DR funds, it is essential that the PRDOH be transparent both in the process of approving the funds and in the selection process and agreements that are held with the actors or subrecipients to whom they are destined to carry out the programs of the final action plan. Primarily, it is necessary that the implementation guides for each of the programs and the eligibility criteria be published as soon as possible.

It is important that the entity selection processes are public and accessible. It is also important that if auctions are called, they in turn comply with the applicable statutes and regulations. Beyond the fact that the PRDOH publishes all the agreements and contracts in the online portal, it is imperative that the updated information on the development of the final action plan programs be published and that there be a record of which communities and how many low-income families victims of Hurricanes Irma or Maria are providing assistance so they can achieve a long-term recovery."

PRDOH Response: PRDOH is committed to leading a responsible and transparent recovery effort. As required by 83 FR 5844, PRDOH must post information related to its CDBG-DR Grant to its website for public consumption. Information including procurement policies,

contracts, Quarterly Performance Reports (QPR), expenditures, program policies and procedures, and other related information will be posted to PRDOH's disaster recovery website at www.cdbg-dr.pr.gov as it becomes available.

As mandated by HUD, PRDOH must follow HUD-approved procurement processes which encourage fair and open competition and comply with 2 CFR 200. Information regarding contracts procured by PRDOH related to its CDBG-DR grant, including contract value, start and end dates, summary of scope, and complete copies of executed contracts, is available publicly at <http://www.cdbg-dr.pr.gov/contratos/>.

"Alignment with other government plans

Required Action: Align all plans that advance the government's public policy regarding community development and long-term recovery. There is an almost complete lack of alignment and coherence between the different action plans presented by the Government.

It must be taken into account that the BPA-E includes the requirement of the second AN, that the BPA-E be compatible with the Economic and Disaster Recovery Plan for Puerto Rico (PREDPR). For these purposes, the specific course of action corresponding to the PREDPR is included in each of the BPA-E programs. However, to date, said PREDPR has not been approved by the United States Congress. Obviously, if PREDPR is not approved and this is amended, they will have the effect of amending the PAE and said amendments must also be subject to citizen participation.

We also draw attention to the fact that both documents (BPA-E and PREDPR) must be evaluated together. However, the only PREDPR published in Spanish is the draft that was subject to public comment, but not the final document submitted to Congress for approval, which constitutes an impediment to the exercise of citizen participation, especially if we take into consideration that, Like the PA submitted by PRDOH to HUD, the final PREDPR submitted to the Congress had substantial changes after the comment period."

PRDOH Response: As required by 83 FR 40314, the substantial amendment to the Action Plan was evaluated for consistency with Puerto Rico's Fiscal Plan and Puerto Rico's Economic and Disaster Recovery Plan. All substantial amendments to the PRDOH Action Plan will be accompanied by a 30-day public comment period, as outlined in PRDOH's Citizen Participation Plan, which is available at <http://www.cdbg-dr.pr.gov/participacion-ciudadana-eventos/>.

"III. Detailed comments on the Draft Amended Plan of Action (BPA-E)

A. Planning

1. Whole Community Resilience Planning Program

Action required: Publish the criteria that led to the formalization of the partnership with the Foundation for Puerto Rico, including any written agreement between the parties.

Action required: Publish the eligibility criteria of the communities that will receive grants through this Program.

Action required: Use the censuses that already exist in numerous communities (also known as community plans) as the axis of comprehensive community resilience planning.

Action required: Promote communities to formalize municipal advisory councils to influence and monitor the planning and implementation of the AP.

Comprehensive community planning is essential to ensure that the identified needs to be met with CDBG-DR funds are identified by the communities themselves. It also allows determining the way in which the different programs will be implemented once the plan is approved, guaranteeing community participation throughout the process. It is for this reason that this program must be, among all, the most carefully detailed.

In the PAE it is indicated that the same will be under the co-administration of the PRDOH and justify the designation of the Foundation for Puerto Rico as co-manager of this program. It is not specified if said non-profit organization has specialized knowledge in planning, community work or if it has had previous experiences that validate it as a member of this program. The written agreements that - we suppose - must mediate between the PRDOH and the Foundation for Puerto Rico have not been published with the objective of fulfilling this delicate task.

The amount allocated to this program was increased from \$35 to \$55 million. While municipalities have a small role within the process (up to \$20,000 per municipality), it is through the Foundation for Puerto Rico that grants of up to \$500,000 will be handled for "some communities." We are not satisfied with what is established in the plan so that the criteria on what these communities will be announced in the first quarter of 2019. The centrality of this program requires transparency and specificity from the beginning, so we demand that they be published. the eligibility criteria in the AP."

PRDOH Response: Specific eligibility criteria regarding phase 2 of the Whole Community Resilience Planning program will be published in the first quarter of 2019, as outlined in the Action Plan. All agreements between PRDOH and partner agencies will be made public at <http://www.cdbg-dr.pr.gov/contratos/>, when available.

"Housing"

1. Title clearance program

Required action: Complete the necessary processes before HUD to accept the affidavit of ownership accepted by FEMA for cases where there are no formal titles.

Required action: Eliminate or substantially reduce the money earmarked to be destined to this program to assign it to the one of communitarian strategic planning, according to the parameters discussed above.

Required action: Publish data, maps and other information on which the determinations on floodplains, flood-prone or high-risk areas that shall prevent the program eligibility are based.

This program was not part of the BPA's first allocation. Neither was it part of the Action Plan presented for public participation. It appeared in the Plan submitted and approved by HUD on July 29. We require that the program is considered, in its entirety, as a substantial amendment and that the following comments are taken into consideration.

It should be taken into consideration that the AN overtly establishes that the following modifications are substantial amendments: a change in the benefits of the program or the eligibility criteria; add or delete activities; or the allocation or reallocation of funds. When facing a substantial amendment, the process established in the AN has to be complied with, including the period of citizen participation. Likewise, in PA "substantial amendments" is defined as "changes in the criteria of some program on benefits or eligibility, the addition or removal of the activity, or allocation or reallocation of more than 10% of the grant funds", which will be published for at least fourteen (14) days, to allow the public to provide supplies before incorporating them into the PA.

Regarding the content of the program, which receives \$ 40 million, it does not explain how the authorization of titles will be achieved pursuant to the current public policy in Puerto Rico. The individual legal strategies do not represent a real solution to the situation of ownership in Puerto Rico. Moreover, there is a real concern on how people will be handled and taken care of, people who will be determined to live in areas prone to flooding or unsafe areas, particularly when these areas "prone to flooding or unsafe areas" have not been identified by the Government and plans of flood remain under review.

The PRDOH knows that FEMA denied between 40,000-77,000 applications for individual assistance claiming that ownership could not be verified. Contrary to what is established in federal regulations, FEMA required the owners to have deeds of ownership or else, to present affidavits to prove ownership. The disparate treatment received by the applicants caused that thousands of people who had the right to repair their homes were unable to get a permission for their structures and enjoy fair housing. Ayuda Legal Puerto Rico, next to other Puerto Rican organizations, directed a legal effort that ended in the development of an affidavit according to the FEMA guidelines, which includes the definition of "owner" pursuant to the federal law. This was accepted by FEMA and it allows people who were denied assistance due to the fact that they were not able to verify ownership to appeal their case again. The approval of FEMA is based on the fact that, both for the local and the federal law, a formal title is not required to consider a person as the owner of the property, thus being eligible for assistance. The fulfillment with the affidavit is enough to satisfy the requirement of ownership, pursuant to what is required by the Program of Individuals and Family of FEMA, and to be eligible for assistance.

In Texas, a similar process was carried out, where the legal community developed an instrument (affidavit of heirship) to allow the people to prove ownership before FEMA. After Hurricane Ike in 2009, the local State Government, by means of the Land Agency - approved that this same standard could be used with respect to CDBG-DR funds and that it was not necessary to authorize the titles to consider people as owners and eligible to the program.

Accepting the statement as proof of ownership under the PAE would not only expedite the recovery with the CDBG-DR funds but it would also provide the space to debate and promote public policy changes that are relevant for addressing the issue of ownership in a definite and fair way in Puerto Rico. This would dramatically reduce the need to include this money in the PAE, and may allocate the same community strategic planning component discussed before."

PRDOH Response: PRDOH will use traditional and non-traditional methods of verifying property ownership. Information regarding specific documents which will be accepted to

prove ownership will be included in program guidelines. More specific information regarding the Title Clearance program will be published as part of program guidelines at www.cdbg-dr.pr.gov, when available.

“Home Repair, Reconstruction, or Relocation Program

Required action: To define the concepts of repair, reconstruction and relocation.

Required action: Publish data, maps and other information on which the determinations on floodplains, flood-prone or high-risk areas that shall prevent the program eligibility are based.

In this program, the concepts of repair, reconstruction or relocation are not defined. Due to the fact that these are conditions that directly affect the right to fair housing, to decide and to stay, these definitions are indispensable. The specific criteria that allow discerning in which cases there will be access to repair, reconstruct or relocate is not specified. The remark which refers to the ineligibility of those people whose residences are located on alluvial plain, land prone to flooding or unsafe areas, forces to us to reiterate what was established in the previous point:

"There is also concern on how people will be handled and taken care of, people who will be determined to live in areas prone to flooding or unsafe areas, particularly when those areas "prone to flooding or unsafe areas" have not been identified by the government and flood plans remain under revision. "

PRDOH Response: Thresholds and criteria outlining what constitutes rehabilitation, reconstruction, or relocation are available in the Action Plan. Relocation offered under this program is voluntary. PRDOH is committed to affirmatively promoting housing choice.

“3. Low income housing tax credits

Required action: Establish incentives to prioritize the purchase of evicted or vacant homes, rather than encourage new construction.

In the PAE, the allocation of this program is increased from \$100 to \$400 million. This allocation would be directed to offer tax incentives to developers of "social housing" projects. As it was mentioned on numerous occasions, the construction of new properties does not promote the sustainable development of housing in the country. This when, according to the Puerto Rican Planning Society there exist near 360,000 abandoned properties in Puerto Rico. Compliance with the cost-effectiveness criterion provided in the AN, must first include the occupation of existing non-dwelling houses”

PRDOH Response: Low Income Housing Tax Credits (LIHTC) are not issued by PRDOH. LIHTC are governed by the United States Internal Revenue Code (IRC). Thank you for your comments. PRDOH will take these into consideration during further development of the CDBG-DR Gap to Low Income Housing Tax Credit (LIHTC) program.

"Economic revitalization

Required action: The BPA-E does not detail or include how the presented programs of economic revitalization complied with the minimum criteria established by Section 3 of HUD

Required action: That the PRDOH establishes standards of mandatory compliance with hiring and training people and local businesses in complying with the minimum criteria required by Section 3.

The BPA-E suffers from the same failures in the description of the programs of economic revitalization as the PA approved by HUD. Programs under this line do not yet describe how LMI people will benefit from its implementation. It is requested to the PRDOH to establish how the economic recovery programs will benefit these populations, in particular, those for whom an exemption from HUD was requested, as the Tourism and Business Marketing Program, for which about \$115 million will be allocated.

BPA-E lacks specificity regarding compliance with what is set out in Section 3. This section establishes minimum requirements regarding hiring, training and opportunities for individuals and small local businesses. Now, PRDOH can adopt higher standards covering the minimum requirements in section 3, thus providing mandatory compliance with all recipients of CDBG-DR funds. Setting high standards would not only increase and protect the local workforce, but it would also keep the flow of funds within the jurisdiction, benefiting the communities in a direct way and in the long term. The gender perspective shall be taken into consideration when it comes to contracting, taking into account the feminization of poverty and its worsening after the disaster.”

PRDOH Response: As required by HUD, 70% of the overall CDBG-DR grant must be expended to benefit low- and moderate-income persons. An estimated percentage of funding spent for each program which will benefit low- and moderate-income persons is included in the overall budget table included in the Action Plan. Program implementation will be conducted in a manner which will not cause discrimination on the basis of race, color, religion, sex, disability, familial status, or national origin.

“Workforce training program

Required action: it shall be specified how the workforce training in the hospitality and tourism industry would benefit LMI people.

Required action: It shall describe the content of the integrated program to be implemented throughout the island in order to identify the most crucial economic sectors to achieve recovery.

The workforce training program seeks to promote the construction, hospitality and tourism industries. It indicates that there is a shortage of skilled labor within these industries for the demand that has emerged in these post-hurricane areas. This program does not describe how the training in the areas under these lines will benefit LMI people. Training in hospitality and tourism could limit the development of the local workforce in the long run.

In turn, within this program, an integrated training program is mentioned, which will be managed by the DDEC. The program indicates that it will work to identify better practices and identify strategies needed to create a program of particular integrated training for Puerto Rico to be implemented throughout the island. A component of citizen participation shall be included in the development of integrated training programs, in particular to identify areas where they can develop capacity and thus contribute to an economic development in the long run.

The integrated training program mentions a component that will be addressed together with the Destination Marketing Organization (DMO) and the Tourist Board of PR by identifying candidates who may serve as sponsors that hire trainees. We request that standards and controls be established about who these sponsors will be, who will come to hire local trainees. It shall be guaranteed that they are companies and local businesses that start the process of hiring trainees. In turn, controls should be established on the long-term development of trainees in these areas to guarantee sustainable jobs in the long term.

In order to promote the food sustainability of Puerto Rico, an entry of this program must be included for workforce training in the area of sustainable agriculture. The Universidad de Puerto Rico (University of Puerto Rico) in Utuado, for example, has academic programs in sustainable agriculture and agricultural technology. A partnership with universities serving these areas - as well as a program of trainees in them--would foster the development of a workforce that would promote agricultural economy and work long term for food sustainability."

PRDOH Response: Thank you for your comments. PRDOH will take these suggestions into consideration during further development of the Workforce Training program.

"Tourism and business marketing program

Required action: The capacity or experience of Invest Puerto Rico to manage this program shall be published, as well as the agreements that exist with Invest Puerto Rico and the DMO

Required action: Describe how the tourism and business marketing program will comply with the objective of benefiting LMI people.

The PRDOH will assign DDEC, the DMO and Invest Puerto Rico a portion of the \$115 million designated for this program. It indicates that the majority of the recovery and expansion of business services is focused on marketing and advertising campaigns. PRDOH must describe how these programs benefit LMI people and, in turn, publish the capacity that InvestPR has to receive and manage a portion of these funds, the amount it received and to publish the agreements that may exist between the PRDOH and this entity."

PRDOH Response: As by HUD, 70% of the overall CDBG-DR grant must be expended to benefit low- and moderate-income persons. An estimated percentage of funding spent for each program which will benefit low- and moderate-income persons is included in the overall budget table included in the Action Plan.

All agreements between PRDOH and partner agencies will be made public at <http://www.cdbg-dr.pr.gov/contratos/>, when available.

Re-Grow Puerto Rico - Urban and Rural Agriculture

Required action: Effectively and really integrate small farmers who have reported their needs including participation as a priority. This, as a central axis to design or develop a plan related to jobs, services and investments within the agricultural area.

Required action: Add a program that benefits artisanal fishermen, protects their communities and, at the same time, promotes food sustainability.

The Re-Grow program within the BPA-E is aimed at gastronomic tourism as a model to boost economic sustainability, without including in this program support or strengthening for small farmers. The program does not describe how gastronomic tourism will benefit LMI people.

The program has no guidelines on how the proposed agricultural activities will be carried out, like community gardening, greenhouses and aquaculture. There is no description of the parameters or the environmental and ecological standards which the companies must comply with for sowing. As mentioned, the small farmers are not included in the programs, including ways of supporting and protecting their crops.

As well, part of this program should work together with a workforce training program in the area of sustainable agriculture. In this way, the prevailing need for food sustainability is addressed, thus fostering workforce development in these areas in the long term, the creation of new work and preventing the escape of young skilled people in these areas.

In the same way, nothing is said in this draft about programs which benefit the artisanal fishing. Fishing communities are in a vulnerable position - due to environmental pollution and erosion of the beaches among other things - so there must be a program that benefits these fishermen. After the hurricane, fishing village facilities, docks and boats were affected at an island level. This program seeks to encourage artisanal fishing, thus really and effectively integrating these fishermen, so that sustainable economic development is encouraged in this industry. At the same time that these fishing communities are benefited, the country's food sustainability is being helped."

PRDOH Response: The Re-grow PR Urban-Rural Agriculture program is a food security initiative which may provide assistance to urban or rural, large- or small-scale agriculture, livestock or aquaculture installations. Thank you for your comments. PRDOH will take them into consideration during further development of the program.

"Coordination with FEMA

Required action: Publication of the assessment made for the allocation of funds to the program

Required action: Include the criteria and the description of eligible projects under the program, including how they comply with the objectives of addressing vulnerable populations and LMI people and the unsatisfied housing needs

In the BPA-E presented for comments, there was no amount for this program. In the PA sent and approved by HUD on July 29, 2018, the amount of \$100,000,000 was allocated to this program, information that was added later after comments. Now, in BPA-E, the allocated amount is increased to \$ 1,000,000,000.

The program, as it was presented in the BPAE, is limited to indicate the possibility of matching funds of the FEMA Hazard Mitigation Grant Program (HMGP) with CDBG-DR funds. Although projects that benefit LMI people are identified as program priorities, the reality is that the program does not specify what the resilience projects that would qualify would be and it does not contain the eligibility requirements for project applications submitted under this program, nor does it include how these would benefit LMI people."

PRDOH Response: As by HUD, 70% of the overall CDBG-DR grant must be expended to benefit low- and moderate-income persons. An estimated percentage of funding spent for each program which will benefit low- and moderate-income persons is included in the overall budget table included in the Action Plan. Match funding for FEMA Hazard Mitigation Grant Program (HMGP) and FEMA Public Assistance (PA) projects are contemplated under this program. Specific, individual projects to be funded using a global match have not been identified at the time the Action Plan was submitted. All projects will be evaluated in accordance with federal regulations and program guidelines.

Critical infrastructure resilience program

Required action: Include specific criteria and parameters for activities eligible under the program.

Required action: Expression of how this program meets the objectives of the unsatisfied housing needs, vulnerable populations and LMI people.

Required action: Specify how this and other infrastructure programs will address the needs of people with functional diversity or different mobility.

This new program is allocated \$700,000,000 to finance reconstruction, strengthening and improvements to crucial infrastructure. The increase and protection of health and safety of the residents in the affected area is identified as program achievement.

The municipalities are the only ones eligible for this program, these having to prove that the impact was due to the hurricane. The proposed activity must be eligible for CDBG-DR grants and serve 16 crucial infrastructure sectors. Although the program indicates what those 16 sectors are, it lacks any guidelines or specific parameters to determine eligible activities under it.

According to the content of the program, this is aligned with the PREDPR in activities that give priority, in the short term, to crucial health and safety needs. Now, when evaluating the identified courses of action, we see that most of them are aimed at the telecommunications area and a single activity related to planning of shelters for emergencies (CPCB 7), being these activities, according to their description, of long-term implementation.

While it is true that addressing the problem of telecommunications infrastructure is vital, the reality is that it is also important to address other areas such as roads and bridges. We cannot ignore the fact that many communities were cut-off when the highways and bridges which gave access to them collapsed. In addition, this same situation prevented rescuers and supplies from accessing these communities.

On the other hand, it is well-known that the BPAE must be aligned to the bare needs of vulnerable individuals. Defined as those groups that may be most vulnerable to losing their homes after a disaster, these populations include people with functional diversity. Infrastructure planning must recognize the right to the city of these people ensuring, for example, that sidewalks are in optimal conditions for the transit of persons with diverse mobility, that there are ramps, signs of danger or visible warning signs and other criteria pursuant to the federal law "Americans with Disability Act" and the section 504 of the Rehabilitation Act.

PRDOH Response: Thank you for your comments. PRDOH is committed to adherence to all local and federal laws and regulations concerning accessibility for those with access and functional needs and other disabilities. PRDOH will take these suggestions into consideration during further development of this program. More specific information regarding the program will be published in program guidelines, after HUD approval of the program.

"Community resilience centers

Required action: A specific definition of "community resilience centers" and the functions they will perform must be included in the BPA-E.

Required action: To establish specific eligibility criteria for non-governmental organizations and municipalities.

Required action: Expression of how this program meets the objectives of the unsatisfied housing needs, vulnerable populations and LMI people.

This newly created program is assigned \$75,000,000 for the creation of a network of community resilience centers (CRC) around on the island, to provide support and services during disasters.

The program lacks a concrete definition of what a CRC is, and of the specific functions of these centers.

Although the program indicates that both municipalities and non-governmental organizations (non-profit) are eligible for it, the reality is that the way in which the program is designed is more aimed at non-profit organizations, requiring that you have premises or a building that will serve as CRC, which is registered and which can cover the operating and maintenance expenses throughout the year, every time that CDBG-DR funds under this program cannot be used for these expenses. However, the program envisages that a CRC is not incorporated into an entity of an existing agency, which seems contradictory.

According to the program, the CRC will be created by the renewal of existing facilities, but it also includes the construction of new facilities. The program does not indicate the criteria to determine the cases in which the renewal of the facilities shall be applied, or the scope of such renewal (if it refers only to a physical plant or if it includes other aspects). The criteria to determine how feasible the construction of new facilities is, is not established.

When examining courses of action, corresponding to the PREDPR, identified in the program, we do not see how these relate to the creation of the CRC."

PRDOH Response: Thank you for your comments. PRDOH will take these suggestions into consideration during further development of this program. More specific information regarding the program will be published in program guidelines, after HUD approval of the program.

The Community Resilience Centers program is not intended to meet immediate housing needs. However, PRDOH recognizes that recovery is a multi-faceted effort. Programs like this are essential to the long-term success of housing programs because they provide

opportunities necessary to ensure homeowners and renters feel secure in their communities, and to ensure that housing is supported by sufficient resilient infrastructure.

PRDOH has reviewed corresponding courses of action associated with programs in the Action Plan.

Multisector initiatives

The PAE includes a new program of multisector initiatives related to economic development and revitalization, infrastructure, planning and housing. It also includes two (2) programs of new creation: city revitalization program and Puerto Rico by design.

City revitalization program

Required action: Expression of how this program meets the objectives of the unsatisfied housing needs, vulnerable populations and LMI people.

Required action: The specific eligibility criteria for municipalities, NGOs and non-profit organizations shall be included, as well as the criteria and parameters for the projects to be considered under the program.

According to the BPA-E, this program seeks to fulfill the achievements of revitalization of urban centers, specifically businesses, and ecological rehabilitation, for which \$1,200,000,000 is assigned to the program. The program identifies the municipalities, NGOs and non-profit organizations as applicants and the applications must comply with the national objectives of LMI and the prevention or elimination of poor areas.

It calls our attention that the program includes the financing of improvements to public spaces and cultural, artistic and recreational facilities. Every time that eligible projects under this program are also covered by the housing, infrastructure and economic development programs, the allocation of these funds to the municipalities can be diverted to address issues that are not related to the objective of meeting the unsatisfied housing needs, and they would not benefit those populations of low or moderate income. For example, by means of this program the municipality of Cataño can obtain funds to make improvements to the Parque Esperanza, Centro de Actividades Wilson Ramos or the Convention Center, and not to meet the prevailing and unsatisfied housing needs and communities mitigation as Juana Matos.

In terms of ecological rehabilitation, the program lacks specific criteria for both applicant organizations and projects.

This program has a reserve of \$100,000,000 for the development of urban areas and shops around the precinct of Río Piedras and Mayagüez of the UPR. Now, the reason why these two precincts are benefited and not all the precincts of the UPR are not indicated. Neither the strategic investments to which priority is being given are included, nor who would qualify for these funds.

As far as the courses of action corresponding to the PRED, except for the municipal points of wireless connection (CIT 19), the others do not keep relation whatsoever with the purpose of this program.

2. Puerto Rico by design

Required action: Expression of how this program meets the objectives of the unsatisfied housing needs, vulnerable populations and LMI people.

Required action: To publish an assessment which has been carried out in order to determine the allocation of funds to this program.

By means of this program \$700,000,000 are allocated to make an international competition of design and construction during 2019, to begin the construction of the winning project in 2020. However, the main objective is the economic development and the infrastructure. It is expected to obtain incidental benefits in housing, among others.

The program does not establish criteria for eligibility of participants or projects to be presented. It is exactly due to the lack of these criteria or guidelines as to the nature or objectives of the projects to undergo that the program is designed rapidly and in a vacuum, being unreal its intention to start the competition in January 2019. Now, of the courses of action corresponding to the PRED, we can infer that among the projects to be considered there are: redevelopment of the Roosevelt Road Naval Base (ECN 15); redesign, reorganization and reconstruction of parks (NCR 20); and improvements to the airport Rafael Hernández (TXN 3).

It is clear that this program does not meet the main objectives of allocating CDBG-DR funds to meet unsatisfied housing needs, nor does it benefit LMI population."

PRDOH Response: Thank you for your comments. PRDOH will take these suggestions into consideration during further development of this program. More specific information regarding the program will be published in program guidelines, after HUD approval of the program.

Multi-sector initiatives are not intended to directly meet immediate housing needs. However, PRDOH recognizes that recovery is a multi-faceted effort. Programs like this are essential to the long-term success of housing programs because they provide opportunities necessary to ensure homeowners and renters feel financially able to care for and maintain their homes, secure in their communities, ensure that housing is supported by sufficient resilient infrastructure.

PRDOH has reviewed corresponding courses of action associated with programs in the Action Plan.

"III. Final Recommendations

As we said in our past reviews, the comments presented here - as well as others which have come up in other groups - could and can be corrected by means of real and adequate participation of civil society. What was proposed by the Department of Housing will only move towards a fair recovery if the work the most affected communities by the disaster, as well as their needs is recognized. Otherwise, the priorities of the development will always be others: the enrichment of sectors that do not contribute to the economy, the procrastination of the needs of vulnerable populations, the marginalization and displacement of impoverished sectors. It is for this reason that, once again, we make ourselves available to accompany and amplify the community voices that claim the protection of their rights.

We repeat what we have already stated in our previous comments:

"We should not lose perspective that these funds should be directed to develop a recovery plan for disasters, which might serve on future occasions and which treats the long-term rebuilding." Instead of displacement of communities, development of more housing and structures or directing these important funds to aspects that are not urgent at the moment or that do not respond to the needs of the most impoverished populations, it is urgent to adopt comprehensive mitigation plans together with grassroots, nonprofit and community groups. In the same way, it should be a priority to develop comprehensive community plans which involve the development of housing, infrastructure, and economic revitalization in response to social and economic needs of the diversity of people and families that coexist in a community."

PRDOH Response: Thank you for your comment. PRDOH looks forward to ongoing collaboration with Ayuda Legal throughout the life of the CDBG-DR grant.

Comment: #270_10-21-18_Marisel Canales

"I attach comments and recommendations on the Action Plan Amendment 1 - CDBG-DR funds published on September 21, 2018."As a consultant specialist in housing programs and federal programs, I include my recommendations to the published Action Plan.

I. In the Area of Programs under the Housing Category

Recommendations;

DISTRIBUTION METHOD

1. To evaluate the possibility to separate part of the budget designated for these programs to be assigned to the municipalities based on population criteria, and estimated damage to homes. The eligible municipalities would be like subgrantees and would comply with a plan of development, rehabilitation and/or relocation of homes affected by the disasters.

II. Social Interest Housing Program, community facilities, reconstruction, repair and resilience of multi-family housing and assistance for buyers

Recommendations;

ELIGIBLE SUBGRANTEES

1. Modality of Consortiums and "Joint Venture (JV)" for these programs must be included. Where it is allowed to present projects by Consortiums of public entities, Consortiums of mixed entities [public and private], "Joint Venture (JV)" of several corporations.

III. Category of Economy Programs [Re-Grow PR; Strategic Projects and Commercial Redevelopment; Investment in economic development from growth portfolio]

Recommendations;

ELIGIBLE SUBGRANTEES

Include modality of Consortiums and "Joint Venture (JV)" for these programs. Where it is allowed to present projects by Consortiums of public entities, Consortiums of mixed entities [public and private], "Joint Venture (JV)" of several corporations.

IV. Infrastructure Category Programs [Community Resilience Centers]

Recommendations;

ELIGIBLE SUBGRANTEES

1. Include modality of Consortiums and "Joint Venture (JV)" for these programs. Where it is allowed to present projects by Consortiums of public entities, Consortiums of mixed entities [public and private], "Joint Venture (JV)" of several eligible corporations.

V. Multi-sector Category Programs

Recommendations;

ELIGIBLE SUBGRANTEES

1. Include modality of Consortiums and "Joint Venture (JV)" for these programs. Where it is allowed to present projects by Consortiums of public entities, Consortiums of mixed entities [public and private], "Joint Venture (JV)" of several eligible corporations"

PRDOH Response: Thank you for your comment. PRDOH will take these comments into consideration during further development of the programs outlined in the Action Plan.

Comment: #271_10-21-18_Michael Fernández Frey (Comunidad de Vietnam)

"This comment is addressed to the action plan of the municipality of Guaynabo in the sector of Pueblo Viejo, Vietnam community.

Identification of community:

La comunidad de Vietnam is located on the coasts of the municipalities of Guaynabo and Cataño. To the North, there is the Bay of San Juan, to the South, the Amelia community and to the West, the Sabana community. The place where it is located is known as Pueblo Viejo by the residents.

This place where life stories converge regarding a community identity that goes back to decades of solidarity and effort by residents who seek to contribute to the common well-being of every single person, whether male or female.

II. Community Details

The Vietnam Community belongs to the group of communities identified by the state as special communities by means of the approval of Law Nr. 1 of 2001. Currently, it has about 225 people of the third age, which reflects this being the most significant population. By means of studies carried out with community partners, the following diseases were identified: diabetes, asthma, high pressure, difficulty in mobility, eye problems, cancer and heart disease, between 20 to 25 people are bed bound. Regarding income per family, they find themselves with diminished income, affecting a state of survival in social demands and the high cost of living, generating barriers in availability and accessibility to have quality basic services.

Regarding housing, since Hurricane Maria, the infrastructure has been in a state that deserves immediate attention, a significant number of residents do not enjoy fair housing despite being women and men who work and contribute to the country, moreover, approximately 45% of the community does not have property title because they are heirs. To conclude, the community does not have a power line related to lighting poles in their roads nor do they have a sewer system, thus exposing the community to face situations related to public health.

III. Needs raised by the community

The needs listed below are in order of priority according to the community.

- *Sewage*
- *Lighting*
- *Road improvement*
- *Community Center*
- *Increase drinking water pressure*
- *Make recreational areas suitable for various populations*
- *Health Centers near the community*
- *Construction repairs of houses affected by hurricane Maria.*

In view of the significant number of elderly people, a housekeeper is required.

IV. proposals

Vietnam Community, for a decade has been working on a community development plan using a methodology for planning and citizen participation. After multiple assemblies and meetings on the streets, the community has generated various proposals to address the various challenges that they face every day.

The development plan arises from a holistic and integral perspective for the biopsychosocial, spiritual and cultural development of the community. Before a full development of the human being, the community is in the process of:

Review the community development plan to adapt it to the new reality provoked by María:

A community development plan was carried out in 2015.

It is under review after Hurricane Maria.

For the review process, there are and we are recruiting technicians from different fields for developing a holistic and participatory plan.

Incubator planning: through the development of eco-tourism. Where the intention is to develop educational, interactive and historical routes on the community, offered by community guides, who are residents of the community. This generates a local economy and jobs.

Community Housekeeper program: we are in the exploration to identify people wishing to belong to the Group of community housekeepers.

Community land: the community has a large number of spaces resulting from the illegal process of expropriation. The community, together with a group of architects, has started the works of community plans and visualizations of the collective spaces.

Community Resilience Center:

The community does not have a center with solar panels, tank, rain water collection to be used in a time of emergency. There is an urgent need for a space to channel and improve distribution networks for the community. This, in turn, can work as a shelter.

Community Center: the community does not have a Community Center. The Community Board is exploring alternatives to the acquisition of a property or the construction of a structure for such purposes.

- *To have recreational and sports spaces.*
- *Tutoring Center: we have a tutoring Center, but we would like to expand the services currently offered.*
- *Community signage: carry out a campaign for naming streets and community spaces.*

PRDOH Response: The Whole Community Resilience Planning program offers an opportunity for communities to create long-term plans for thoughtful and resilient community-wide recovery. Please review the Action Plan for more information regarding the program.

Comment: #272_10-21-18_Carmen Maritza Rodríguez Droz (Comunidad Tiburones de Ponce)

"My name is Carmen Maritza Rodríguez Droz, leader of the Tiburones community. Our community has needs that must be satisfied in order to have a quality of life and, above all, safety in our homes.

Some aspects to be addressed:

Housing:

In our community we still have blue awning houses since they were not helped by FEMA for title deeds.

- *lack of titles*
- *Infrastructure:*
- *lack of lighting on the access road to the community*
- *Debris collection*
- *recreational facilities in poor condition*
- *Unhooking of trees*
- *Road cleaning*
- *River flood*

- *Economic Development*
- *lack of guidance to encourage people to identify alternative means for living*
- *incentive to establish training alternatives for people in the community so they can develop their small business.*
- *incentive for the unemployed*

Proposal and solutions:

As a community, we propose that our needs should be satisfied.

- 1. Granting property titles to the residents of their homes.*
- 2. Reconstruction of the roofs that still have their awnings.*
- 3. Renewable energy in the lighting of road 581 that gives access to the community.*
- 4. Assignment of debris collection and timely report to residents.*
- 5. Reconstruction of recreational facilities, including health services.*
- 6. Incentive for the unemployed people in the community so they can clean the roads. In this way, they will contribute to the economic development of the community.*
- 7. Training of residents on cooperativism to establish some incentive mechanism for them.*
- 8. Establish labor training programs aimed at agriculture and home garden programs that help us grow our own food to be consumed during a disaster.*
- 9. Training on resilience.*
- 10. This is an issue that we have been requesting for years and it would help to avoid that we have to move from our homes. I understand that this is an issue for the government of Puerto Rico to work together with the Municipality of Ponce.*

I would like to highlight an important aspect that is health, after the hurricane, animals continue to arrive and their provenance is unknown and we are concerned about the health of the members of our community."

PRDOH Response: Thank you for your comment. The Whole Community Resilience Planning program offers an opportunity for communities to create long-term plans for thoughtful and resilient community-wide recovery.

The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. The Community Energy and Water Resilience Installations program aims to provide sustainable, renewable energy to residences and small businesses.



The Re-Grow PR Urban-Rural Agriculture program is a food security initiative which may provide assistance to urban or rural, large- or small-scale agriculture, livestock or aquaculture installations.

Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #273_10-21-18_Marisol Jimenez Melendez (Condado Lagoon Neighbors In Action)

Summary: The Condado Lagoon Neighbors in Action submitted comment which states that the original comment submitted by the organization during the public comment period was not found in the Action Plan, and therefore, the organization resubmitted the original comment. The document requests that the Condado Lagoon Revitalization Project be added as a new program in the Action Plan.

The proposal submitted describes the organization as a community group representing approximately 600 households, lists the actions already taken by the organization toward carrying out the project proposed and offers the following specific items associated with the project proposal:

“Planning Activities - The community is interested in carrying out planning activities focused on:

- Housing needs*
- Fitness and healthy lifestyles*
- Access to food*
- Infrastructure needs (roads, utilities, etc.)*
- Shelter/evacuation procedures ○ Emergency medical needs*
- Preventable health conditions (e.g., vector borne diseases)*
- Economic vitality*
- Ecologic sustainability*
- Access to alternate/sustainable power sources*
- Plans for how local government agencies, local NGOs, national, and international aid organizations will communicate and collaborate to address needs*
- Funding can also be invested in other types of planning, including plans for vehicular access to communities and economic revitalization plans.*

Infrastructure Activities:

The Condado Lagoon Revitalization Project would focus on:

- Urban interventions to enhance community cohesion including investments in sidewalks and common areas like parks and plazas*

- *Garbage management and disposal system*
- *Reconstruction of aqueducts/sewage/sanitary and storm drainage infrastructure*
- *Flood control to prevent contamination of the bodies of water through runoff, including the establishment of dikes and the installation of pumps*
- *Establishment of parking garages to increase parking spaces near businesses and tourism attractions*
- *The establishment of trails and other fitness circuits to promote community health*
- *Landscaping and irrigation systems*
- *Acquisition of solar/alternate power generation equipment*
- *Acquisition of illumination, high technology security equipment and closed circuit cameras to prevent crime and improve safety*
- *Establish a community police station*
- *Renovation of dilapidated infrastructure, including bridges and roads, that allow access to our communities*

Economic Revitalization Activities

The Condado Lagoon Revitalization Project would focus on investment in enhancing the offering to services and public spaces to further attract tourists and taking advantage of the natural resources offered by the Condado Lagoon to establish sustainable eco-tourism that supports small business development and creates employment.

The following activities types of can be funded through CDBG-DR:

- *Address issues related to runoff which is contaminating waterways and beaches which are a major factor in attracting tourists*
- *Establishment of outdoors fitness circuit, bicycle routes and bridges across highly trafficked streets and highways which fully connect the communities surrounding the Condado Lagoon (including Santurce, Miramar, Condado and Old San Juan)*
- *Beach nourishment projects which expand the area of beach which the hurricanes eliminated*
- *Public bathrooms near tourist attractions and natural attraction*
- *Leveraging and connecting existing infrastructure like the Jaime Benitez Park, Ventana al Mar, Parque del Ancla and Paseo Linear by improving transportation alternatives and vehicular access, establishing a fund for eco-friendly/small business to maximize recreation and culinary activities and roads/sidewalks to improve access to the Lagoon*
- *Funding for the establishment of housing and supportive services for the homeless*
- *The Condado Lagoon is a strategic economic development asset for Puerto Rico and investments need to be made to maintain and expand its impact on the local economy.*

However, the water quality of the Lagoon after the Hurricanes has been affected due to runoff and flooding from damages to our community as can be seen in the attached pictures below.

Preparedness and Mitigation Activities

The Action Plan should ensure that CDBG-DR funding can be used for other activities including the following which are all necessary in our community:

- *Flood barriers, contention walls and other strategies to mitigate and control flooding and storm surge*
- *Mangrove re-forestation activities to mitigate the effects of erosion*
- *Dredging of sediments in local water ways like el Cano Martin Pena which produce flooding and erosion to the communities in the San Juan Bay*
- *Installation of water pumps to drain the area in cases of flooding and disaster*

For these aforementioned reasons we consider that the Condado Lagoon Revitalization Project is of critical importance to Puerto Rico's recovery and should be adopted and added as a new program to the Action Plan."

PRDOH Response: Although each proposal may not have been referred to by name in the Action Plan, all submittals received in relation to the initial Action Plan and its substantial amendment were reviewed carefully by PRDOH and were considered in the development of the plan. The comment and response to the original submission by this organization is included as comment number 40 in the Public Comment Appendix to the initial Action Plan.

Thank you for your comment. The Whole Community Resilience Planning program offers an opportunity for communities to create long-term plans for thoughtful and resilient community-wide recovery. PRDOH anticipates that guidelines for this program will be published in the first quarter of 2019 to www.cdbg-dr.pr.gov.

Comment: #274_09-23-18_Hector L. Velez Cruz (US Environmental Protection Agency)

"Thank you for your commitment and work assisting disaster survivors in Puerto Rico in the aftermath of Hurricanes Irma and Maria. We want to thank you for the opportunity provided to submit comments on the Amended Action Plan for the Community Development Block Grant-Disaster Relief (CDBG-DR) for Puerto Rico.

Attached you may find:

Transmittal letter to your attention from EPA Region 2 Regional Administrator, Mr. Pete Lopez; EPA's comments and recommendations related to the CDBG-DR Amended Action Plan; and List of projects with unmet needs."

Email Attachment

Summary: The EPA provided a letter and additionally two attachments; one containing a table of detailed comments specific to sections in the action plan as listed below:

Specific changes to the Action plan are in quotations below. Other suggestions are outlined based on the area upon which they were focused.

General

- *"When performing the analysis to establish the costs reasonableness of the goods and services under CDBG- DR, PRDOH should ensure that prices are consistent with market costs that a prudent businessperson would pay today. The Government should avoid when conducting a procurement process, considering bids that have unreasonable inflated costs if such increase is solely due to the Government being the requestor or solicitor of the good and services, like it has historically occurred (in general, bidders tend to quote higher for the Government when compared to a private party)."*

PRDOH Response: Thank you for the comment. As mandated by HUD, PRDOH must follow HUD-approved procurement processes which encourage fair and open competition and comply with 2 CFR 200. Information regarding contracts procured by PRDOH related to its CDBG-DR grant, including contract value, start and end dates, summary of scope, and complete copies of executed contracts, is available publicly at <http://www.cdbg-dr.pr.gov/contratos/>.

Building Back Better Page 19

- *Include language in "The Green Building Standard which focuses on 3 primary attributes: Healthy Homes, Lower Operating costs, and Sustainable Lifestyle means that PRDOH will require all applicable construction meets, at minimum, the Energy Star (certified Homes or Multi-Family High- Rise) and EPA Indoor AirPLUS program.....PRDOH will ensure that the 3 primary attributes of the Green Building Standard will be used in the program policies and procedures, as per HUD requirements."*
- *Include language "All buildings (residential and commercial) shall be designed and constructed in accordance with the International Energy Conservation Code (IECC) and the 2018 Intl. Building Code (2018 IBC)."*
- *Include language "Overall, it is recommended that the Government of Puerto Rico designs its building code to also comply with the 2018 International Green Construction Code (2018-IgCC). The 2018-IgCC is to provide fundamental criteria for energy efficiency, resource conservation, water safety, land use, site development, indoor environmental quality and building performance that can be adopted broadly. By adopting green building requirements into its code, it can lure more projects into LEED certification by setting prerequisites and establishing credits that can be earned by meeting Puerto Rico's new building code like California has done. This will result in LEED certified buildings that will save energy, water, resources, generate less waste and support human health."*

PRDOH Response: Thank you for your suggestions. PRDOH has taken them into consideration.

Unmet Needs Assessment Page 22 to include:

- *Include language “Large-scale infrastructure activities and broader impact are assumed to be captured in the Build Back Better report published in November 2017 and are not re-listed here. Additionally, the 12 -month Economic and Disaster Recovery Plan conducted under FEMA’s engagement of the Homeland Security Operational Analysis Center (HSOAC) contains a much broader analysis with greater access to additional data. However, it is not known how much funding large-scale infrastructure activities are going to receive through congressional appropriations as of now. A full list of data sources and literature analyzed for this unmet needs assessment can be found in Appendix A. Therefore, the unmet needs assessment will also be updated as additional data becomes available and as part of the Action Plan process for additional CDBG-DR allocations. A full list of data sources and literature analyzed for the unmet needs assessment in this plan can be found in Appendix A.”*
- *Impact to the overall system in terms of debris generated and lack of capacity is significant. This should be captured in the Unmet Needs chart on p. 77. Estimated needs for landfill closure, new landfill construction, and related solid waste infrastructure, based on the RAND Report are \$700M. These numbers are exclusive of any attempt to address/relieve pressure on landfill capacity through source reduction, composting, recycling, etc.*

PRDOH Response: Thank you for the comment. Although PRDOH cannot be sure, PRDOH assumes that comment or is referring to the Economic and Disaster Recovery Plan for Puerto Rico as the “RAND Report.” This report informed the updated unmet needs assessment included in the substantial amendment to the Action Plan.

Infrastructure unmet needs Page 76

- *Include language “Public Assistance data is slow to materialize as municipalities and Puerto Rico government agencies work on creating project worksheets.”*
- *Include language: Unfortunately, FEMA’s Open FEMA Dataset: Public Assistance Funded Projects Details - V186 currently has only some of the closed-out project data for Category A (Debris Removal) and Category B (Protective Measures), and limited data on projects across the six additional project areas; Roads and Bridges, Water Control Facilities, Public Buildings, Public Utilities, Recreational or Other, and State Management. Also, limited data is available on municipal stormwater systems, watershed management and solid waste management projects that may not be covered under the FEMA’s six project areas. FEMA, EPA and USACE are working collaboratively to raise the necessary data on damages and capacity building needs to identify possible projects and funding streams.*

PRDOH Response: Thank you for the suggestion. PRDOH has incorporated feedback into the final draft version of the Action Plan.

Planning

- *Whole Community Planning Page 113*



- *Include language “Recovery Plan Alignment: The whole community Resilience Planning program aligns with the following courses of action from PR’s Recovery Plan:CPBG 9, HSS-2 (Prevent Disease through a capacity building Healthy Housing Initiative Targeting Mold, Lead, and Asthma); HSS 22, WTR 16, WTR 17, WTR 18 and MUN 7”*
- *Economic Recovery Planning Page 116*
 - *Include HSS2 Recovery Plan Alignment program aligns with following courses of action from Puerto Rico’s Recovery Plan: CPCB 4, CPCB 12;HSS 2, etc.”*

PRDOH Response: Thank you for your comment. Program alignment with courses of action has been reviewed by PRDOH.

Housing

- *Define Substandard Housing on page 10 (26pdf)*
- *Define Moderate Income on page 97 (113pdf)*
- *PR construction to design building codes to comply with International Green Construction Code (2018-IgCC)*
- *Housing Programs on Page 122 should consider “the inventory of surplus properties resulting from foreclosures in single housing and multi- family housing should be highly considered when finding housing solutions.”*
- *Social Housing Program*
- *Capitalize AIDS on pages 39-40*
- *“The inventory of surplus properties resulting from foreclosures in single housing and multi- family housing should be highly considered when finding housing solutions.”*

PRDOH Response: Thank you for your comments. PRDOH has taken them into consideration. A glossary of frequently used terms, including Low and Moderate-Income, is included in the appendices to the Action Plan.

Home Repair, Reconstruction, or Relocation Program Page 124:

- *Include “individual household wastewater disposal systems (i.e., septic systems). Approximately, 41% of the population overall and 65% of the population in rural areas handle their wastewater service needs through septic systems, which are owned and operated by home owners.*
- *Include the following under hurricane impact “Tens of thousands of homes suffered hurricane damage and are still in need of repair, including individual household wastewater disposal systems (i.e., septic system).” Due to overland runoff for at least 50% of septic systems which are incapable of functioning to prevent sewage contamination and 5% of septic sewage systems directly discharge raw sewage.*

- *Include the phrase “Reconstruct housing, including septic systems, to higher resilience standard.”*
- *Include WTR-17 in “the Home Repair, Reconstruction, or Relocation Program aligns with the following courses of action from Puerto Rico’s Recovery Plan: HOU 1, HOU 3, HOU 10 and WTR 17.”*

PRDOH Response: Thank you for your comments. PRDOH has taken them into consideration.

Social Interest Housing

- *Page 134 include HSS2 in the statement: “Recovery Plan Alignment: The social interest Housing program aligns with the following course of action from PR’s Recovery Plan: HOU 2, HSS 2”*

Housing Counseling Program

- *Page 136 should include WTR 17 in “The Housing Counseling Program aligns with the following courses of action from Puerto Rico’s Recovery Plan: HOU 3, WTR 17 and HSS 30.”*
- *Page 137 should include , prevent sources of lead contamination in homes, how to maintain septic systems to reduce sewage exposure in “Counseling services can range from individualized, one- on-one counseling to help homeowners identify and address barriers to permanent, safe and affordable housing, to advocacy with insurance and mortgage companies, to group education addressing how to remediate mold, prevent sources of lead contamination in homes, how to maintain septic systems to reduce sewage exposure or how to avoid common scams.”*

Community Energy and Water Resilience Installations – Recovery Plan Alignment Page 143

- *Include WTR 12 and WTR 19 in “The Community Energy and Water Resilience Installations program aligns with the following courses of action from Puerto Rico’s Recovery Plan: CPCB 4, and WTR 3, WTR 12 and WTR 29.”*
- *WTR 12 proposes the increase of off -grid renewable energy and WTR 29 proposes the strengthen the redundancy and diversification water reuse practices.*
- *Use the “Organizational Solar Readiness Assessment Tool,³ the Renew300: Advancing Renewable Energy in Affordable Housing,⁴ the Support States In Developing Community Solar Programs” to promote renewable energy and community micro-grid.*

Multi-family Reconstruction, Repair & Resilience Program Page 146

- *Include language in the Recovery Plan Alignment- The Multi-Family Reconstruction, Repair & Resilience Program aligns with the following courses of action from Puerto Rico’s Recovery Plan: HSS 2, HOU 2, HOU 3, HOU 8, and HOU 12 and WTR 19.*
- *Include language in Program Accomplishments “Enhance the resilience of multifamily units in communities across Puerto Rico, by incorporating green building standards, energy and water efficiency, and storm resiliency.”*

- *Include language in Eligible Activities “Housing construction, Acquisition, Green Building Standards which focuses on 3 primary attributes: Healthy Homes, Lower Operating costs, and Sustainable Lifestyle.”*

PRDOH Response: Thank you for your comment. PRDOH has taken these suggestions into consideration. Program alignment with courses of action has been reviewed by PRDOH.

Infrastructure

Executive Summary Comments on the Construction Cost Verification

Infrastructure impact Page 73

- *Address the PR solid waste crisis due to more of waste still being generated from building demolition. “Landfill status/capacity and post-storm solid waste management were not mentioned as part of the Infrastructure Impact section.”*
- *Highlight Debris Management and include*
 - *Landfill closure*
 - *Landfill development*
 - *Transfer Stations*
 - *Equipment needs*
 - *Island-wide composting (diversion program)*
 - *Recycling/source separation initiatives*
- *Highlight the damage to the drinking water/wastewater infrastructure and use of CDBG-DR to assist in those facilities page 74*
- *Impact on Public Services Page 85*
 - *Water, electricity, education, solid waste etc. are all critical public services that impact health and should also be discussed here.*
 - *To address capacity and resiliency issues the following is suggested to be addressed “open dumps need to be closed, new compliant landfills need to be sited, designed, and constructed, and PR needs to address solid waste diversion and management island-wide.”*
 - *To address preparedness and resiliency “develop and implement a disaster debris management plan”*
- *Include language on page 110 (126 or 218 pdf) “There is no line-item for solid waste management or landfills. Landfill capacity should be addressed (by name) under critical resilience infrastructure.”*

Infrastructure Coordination page 176

- *Include language “As public assistance projects are developed, and additional mitigation funds are sought through FEMA, EPA, USDA and other federal funding streams Puerto Rico*

will align future allocations with infrastructure needs. At this time, with the severity of the unmet housing needs and the Stafford Act restrictions regarding Duplication of Benefit, the infrastructure approach will be centered around planning activities (funded under the Planning programs) and close coordination with FEMA, other federal agencies and community stakeholders (such as NGOs), as appropriate.”

PRDOH Response: Thank you for your comment. PRDOH has taken these suggestions into consideration.

Economic Development

Workforce Training Program Page 161

- *Include Capacity building in Green building standards as part of the Healthy housing initiative HHS-2 for the Construction Industry*
- *Include language “However, Puerto Rico is experiencing a distinct shortage of skilled labor within the construction and hospitality industries due to storm damage, recovery and resilience needs and the outmigration of families before and after the hurricane. It is also experiencing shortages of skilled labor to operate and maintain community water aqueducts and to manage municipal solid waste and municipal stormwater sewer systems. As the solar industry is expected to grow, additional efforts should focus on the creation of consistent, high-quality workforce training and skills-credentialing in the solar industry and beyond.”*
- *Include language on Page 161 “Apprenticeships can provide a deeper level of technical and life skills training and financial and logistical support services will help train, coach and employ unemployed and/or underemployed workers so they learn and earn their way to independence and prosperity. Similarly, training programs, including apprenticeships can provide the technical, managerial and financial skills needed for the current workforce dedicated to providing public services, such as, drinking water through community water aqueducts, and solid waste and stormwater sewer system services at the municipal level. Also, a solar curriculum/job training program should be established in Puerto Rico to produce local qualified solar installers. This can be done by identifying local educational institutions (such as community colleges, vocational schools, career centers) and NGOs as potential collaborators that may offer training/certification opportunities on solar systems that can have participants be recognized in the industry as a professional solar installer.”*
- *Include HSS 2 in “Recovery Plan Alignment aligns with the following course of action from PR’s Recovery Plan: ECN 2, CPCB 12, HSS 2, and MUN 2.”*
- *In the Recovery Plan Alignment section include “The Workforce Training Program aligns with the following course of action from Puerto Rico’s Recovery Plan: ECN 2, ECN 23, ECN 26, CPCB 4, CPCB 12, WTR 16, WTR 18, WTR 21 and MUN 2.”*

On page 163 include language “

- *Construction: Green Building and Energy Efficiency; Energy Star and Indoor AirPLUS, Healthy Homes Specialists, Mold remediation;*
- *Healthcare: Community Health Workers; Healthcare Providers”*

Include language on Page 163 “Workforce training programs and the proposed new Apprenticeships will be developed in those industry sectors identified in the economic development plan and may support recovery activities offered in the following categorical areas:

- *Construction [...]*
- *Community Water Aqueducts*
- *Stormwater Management*
- *Solid Waste Management*
- *Tourism and Hospitality*
- *Healthcare*

Other identified unmet workforce training needs to support Puerto Rico’s long-term recovery goals

- *Include language “Puerto Rico’s Apprenticeship program will train a workforce that can learn while they earn as they become part of the narrative in recovery and economic investment. This Apprenticeship model will include:*
- *Partnerships with NGOs to provide continuous training support to community water aqueducts, stormwater management and solid waste management practitioners.”*

PRDOH Response: Thank you for your comment. PRDOH has taken these suggestions into consideration.

FEMA Coordination

- *FEMA Coordination program Page 178 should not be limited to FEMA grants only. It should be expanded to cover local match obligations from other federal funding streams such as EPA and USDA.*
- *Include language Page 178 “Federal Coordination” instead of FEMA coordination*
- *In the program accomplishment section include language “Ease local cost share burden to qualified projects and potentially expedite FEMA Public Assistance and HMGP project funding and other federal grant-in-aid programs through coordinated or global match.*
- *Include language under eligibility criteria “The federal-funded project must meet a National Objective (usually Unmet Need or LMI) and be a CDBG eligible activity as well as an eligible activity based on the federal grant-in-aid program requirements.*

PRDOH Response: Thank you for your comment. PRDOH will leverage other funding sources, when possible.

Critical infrastructure Resilience Program Recovery Plan Alignment Page 180

- *Include language “The Critical Infrastructure Resilience Program aligns with the following courses of action from Puerto Rico’s Recovery Plan: CIT 12, CIT 21, CIT 29, WTR 1, WTR 15, WTR 11, WTR 18, WTR 23 and CPCB 7.”*
- *Include water on page 180 in “Activity is CDBG-DR eligible and addresses one of the 16 critical infrastructure sectors: energy, dams, manufacturing, communications/broadband, chemical, government facilities, defense industrial base, health and public health, food and agriculture, commercial facilities, emergency services, water and wastewater, financial services, transportation systems, or nuclear reactors, materials and waste”*
- *Add landfill closure and new landfill siting, design, and construction to the list of eligible activities under Section 105(a)(9) of the HCDA*
- *Discuss traditional solid waste management infrastructure and sustainable materials management aspects of the identified infrastructure needs.*
- *Sustainable materials management covers much more than solid waste management and includes lifecycle assessment, embodied energy and natural resource capital of materials, green purchasing, source reduction, reuse, recycling, and product stewardship. This approach should be used with respect to all infrastructure planning and development. The economic impact of this approach is substantial with well documented studies demonstrating cost savings, human health and environmental benefits, and green job creation. For example, with respect to organics management, there is tremendous opportunity to transform what is considered a waste stream into the valuable commodity is through thoughtful planning and development including diversion, collection and processing infrastructure which could result in a marketable compost product for agricultural development, landscaping, and flood control and water quality filtration technology applications. This approach should be discussed with respect to materials management (collection-trucks, materials recovery facilities, composting facilities, secondary materials micro-enterprises) as well as the other infrastructure needs including water, wastewater, the built environment (housing, commercial buildings, bridges), and energy.*
- *A cohesive sustainable materials management program should be included and cover the commodities stream of recyclables including organics, municipal solid waste and debris management. The debris management Sustainability and resilience planning and infrastructure development should be included throughout the plan and specified wherever possible. For example, not only should disaster resilient and sustainable building/facility siting and codes be used but sustainable alternatives should also be identified included constructed wetlands for wastewater, rain harvesting/catchment for drinking water, mangroves and compost swales for floodwater retention, earth sheltered structures, daylighting, passive solar, renewable energy options (e.g., wind, solar, geothermal, hydropower and tidal) and off-grid and micro-grid energy solutions including co-generation and distributed generation options.*
- *Sustainability and resilience planning and infrastructure development should be included throughout the plan and specified wherever possible. For example, not only should*

disaster resilient and sustainable building/facility siting and codes be used but sustainable alternatives should also be identified included constructed wetlands for wastewater, rain harvesting/catchment for drinking water, mangroves and compost swales for floodwater retention, earth sheltered structures, daylighting, passive solar, renewable energy options (e.g., wind, solar, geothermal, hydropower and tidal) and off-grid and micro-grid energy solutions including co-generation and distributed generation options.

PRDOH Response: Thank you for your comments. PRDOH will take these suggestions into consideration during further development of this program. PRDOH does not have authority to update eligible activities included in the HCDA.

Community Resilience Centers Page 182

- *Include language in the Recovery Plan Alignment section “The Community Resilience Centers program aligns with the following courses of action from Puerto Rico’s Recovery Plan: CIT 5, CIT 29, CPCB 4, and CPCB 5, PBD 7 and WTR 30.”*
- *Include language on page 186 “The City Revitalization Program aligns with the following courses of action from Puerto Rico’s Recovery Plan: CIT 19, CIT 32, CPCB 5, and CPCB 10 and WTR 19.”*
- *Include language on page 189 “The Puerto Rico by Design program aligns with the following courses of action from Puerto Rico’s Recovery Plan: CPCB 10, ECN 15, NCR 20, WTR 9 and TXN 3.”*

PRDOH Response: Thank you for your comment. Program alignment with courses of action has been reviewed by PRDOH.

The second attachment the EPA provided is a list of project proposals based on the existing unmet needs. The following is a summary of those projects which included a detailed description of the Issue, Costs, Need and Funding Sources.

Energy: Renewable Energy/Alternative Energy Microgrids for Culebra and Vieques

- *\$25,000,000*
- *Funding sources: CDBG-DR funds; EQB DERA Grant funds; EQB Volkswagen Settlement fund; U.S. Economic Development Administration grants; USDA loans; HUD Brownfield Economic Development Initiative (BEDI) Competitive Grant Program; HUD Section 108 Loan Guarantee Program.*

Energy: Renewable Energy/Alternative Energy Microgrids for 21 landfills and 2 former naval sites

- *\$241,910,600 (all 23 sites)*
- *Funding Sources: CDBG-DR funds; EPA/EQB DERA Grant funds; EQB Volkswagen Settlement fund; U.S. Economic Development Administration grants; USDA loans; HUD Brownfield Economic Development Initiative (BEDI) Competitive Grant Program; HUD Section 108 Loan Guarantee Program.*

Integrated Solid Waste Management Program

- >\$800 Million
- *Funding Sources: The 2018 Bipartisan Budget Act assigned \$50 million to EPA to provide support to Puerto Rico and the USVI through a hazardous waste and solid waste RCRA grant. This supplemental budget assignment will be divided at approximately \$40 million to Puerto Rico and \$10 million to the USVI. Although there are other federal agencies with supplemental funding sources and programs, such will still fall short for the overall need of the islands in putting together sound sustainable and resilient solutions to handle the current solid waste challenges and future extreme weather events. Other potential funding sources include: CDBG-DR; USDA; HUD's Brownfields Economic Development Initiative (BEDI) Competitive Grant Program; HUD's Section 108 Loan Guarantee Program.*

Cano Martin Peña Ecological Restoration Project

- *\$815 Million in estimated costs*
- *Funding Source: CDBG-DR*

Water: Puerto Rico Aqueduct and Sewer Authority

- *\$2.83 Billion estimated costs*
- *Funding Source: FEMA PA, FEMA HMGP, CDBG-DR, EDA, USDA, Government of Puerto Rico, PRASA, private insurance, public-private partnership*

Water: Community Aqueducts / Non-PRASA Systems

- *\$63.8 million + \$21.4 million. + \$13.9 million in total estimated costs.*
- *Funding Sources: USDA; CDBG-DR, EPA SRF, FEMA-PA, Government of Puerto Rico*

Water: Septic Systems / Small Private Wastewater Systems

- *\$1.812 billion + \$1.249 billion + \$3.0 million in total estimated costs*
- *Funding Sources: Clean Water Act State Revolving Fund; CDBG-DR, USDA*

Water: Municipal Stormwater Infrastructure

- *\$418.7 million + \$1.005 billion in total estimated costs.*
- *Funding sources: Clean Water Act State Revolving Fund; USDA; FEMA PA; FEMA HMGP; CDBG-DR USDA, DOC EDA, Government of Puerto Rico*

PRDOH Response: Largescale infrastructure projects may be eligible for assistance under the FEMA Coordination or Critical Infrastructure Resilience programs. Additionally, municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipals to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

PRDOH looks forward to an ongoing working relationship with the EPA and other vested parties interested in furthering the recovery of Puerto Rico. Thank you for your comments.

Comment: #275_09-24-18_Mayra Ortiz

"Greetings. I would like information about whether there is help for families who don't have a house of their own and are in the process of building one. Since I lost the roof of the home where I lived in Irma, my father helped me to repair the roof and then it was lost in Hurricane Maria, as well as my belongings. I looked for help and since the house is not registered on my name they did not help me, they tried to ask for it through the owner without success I asked for loan without success, the only savings that I had to begin to opposite my schedule I used them to be able to enable that house to my children."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

The Homebuyer Assistance program offers down payment and closing cost assistance for the purchase of a new home. PRDOH will use both traditional and non-traditional methods for verifying ownership.

Comment: #276_10-03-18_Olga N Ramos

"I live in Vega Baja and the condition of the house is not the best"

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. Information regarding this and other housing programs is outlined in the Action Plan.

Comment: #277_10-14-18_David Ortiz

"My idea about the help for housing funds is that these funds are offered to all public employees, not only to teachers, but also to counselors, police officers, firefighters, school cafeteria employees who wish to buy their first home"

PRDOH Response: The Homebuyer Assistance program offers down payment and closing cost assistance for the purchase of a new home. This program is not restricted only to teachers.

Comment: #278_10-14-18_David Ortiz

"My idea about the federal funds to use is that the funds should be used for the public employees who are married and also the single ones for the purchase of their first home"

PRDOH Response: The Homebuyer Assistance program offers down payment and closing cost assistance for the purchase of a new home. This program is not restricted by marital status.

Comment: #279_10-14-18_Brendaly Marcano

"We need to revitalize the economy through job creation. We must include projects and/or plans to invest in the health sector, especially the hospital industry, which is so important for our country. The jobs generated are of good quality."

PRDOH Response: PRDOH agrees regarding the importance of economic revitalization in the overall recovery process. Thank you for your comment. Information about economic development programs can be found in the Action Plan.

Comment: #280_10-19-18_Matt Tindall

"In the Multi-Family Reconstruction, Repair & Resilience Program called for in the Substantial amendment, we request that the acquisition program and/or the existing buildings reference in the reconstruction/repair program clearly include adaptive reuse or conversion of existing space to provide multi-family housing. On page 128 under Program Caps, you indicate that "The maximum award for housing rehabilitation in place is \$60,000 in construction and/or hard costs per unit." On Page 125 under Program Objective & Description, it states that "Homes become eligible for reconstruction when the property estimated cost of repair exceeds \$60,000 or 50% of the current value¹³² – as confirmed through program inspection". i. Comment – what happens when a home's value is determined to be \$160,000 and the estimated cost of repair of the home is \$65,000? In this case, if you repair the home, you exceed your rehab cap, but the home does not qualify for a reconstruction because the recon decision cap is 50% of the value of the home (or \$75,000 in this case). Does the applicant not get served? This is another scenario that will likely be encountered throughout the recovery efforts that further supports having a hard dollar decision criterion to determine whether the home will be a rehabilitation or reconstruction"

PRDOH Response: Thank you for your comment. Under the Home Repair, Rehabilitation, or Relocation program, homes become eligible for reconstruction when the property estimated cost of repair exceeds \$60,000 or 50% of the current value. In the scenario described, cost of repair exceeds the rehabilitation cap, and the home would be classified as a reconstruction or relocation or evaluated on a case-by-case basis.

Comment: #281_10-16-18_Cabo Rojo Municipio

Summary: Cabo Rojo has proposed 10 projects which address areas of need in their community, pluvial infrastructure, improvements for bridges, reutilization of lost spaces for public nuisance spaces etc. as part of their goals to recover from Maria and Irma.

PLANNING

- *For the whole community resilience planning they cite a need to double max award for personnel in the municipios working on collecting the data, developing the database and plans since the actual costs will be greater than \$20,000.00.*
- *The GIS planning program doesn't specify or incorporate municipios in that planning process. Access to data is not discussed in the program design and how work will happen at a local level.*

HOUSING

- *For the social interest housing program, municipalities are not mentioned as well as construction of housing for vulnerable populations*

INFRASTRUCTURE

- *On the FEMA coordination program they favor the 25% as contribution for the municipios for the categories C-G projects.*

ECONOMIC DEVELOPMENT

- *The construction commercial revolving loan should also include users of commercial small businesses and medium sized businesses to focus on existing local economies.*
- *Workforce training program doesn't mention how resources will be distributed across regions and how the municipios would participate so that vulnerable populations are identified to promote local investment.*
- *Tourism and Business Marketing doesn't identify the distribution of funds or promotion through the municipios that have local tourism economies outside of the metropolitan areas. It doesn't allow municipalities to apply for this funding directly.*

PRDOH Response: Thank you for your comment. Programs outlined in the Action Plan are not geographically restricted; residents of Cabo Rojo may be eligible to receive assistance. Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

PRDOH has taken these suggestions into consideration. PRDOH values collaboration with municipios and looks forward to a positive working relationship with municipios throughout the life of the grant.

Comment: #282_10-14-18_Daniel Acosta

"Pursuant to the Disaster Recovery Action Plan approved July 29, 2018 and the First Amendment to the Disaster Recovery Action Plan currently pending approval, the Puerto Rico Department of Housing established a CDBG-DR Gap to Low Income Housing Tax Credits (LIHTC) Program to address the impact on thousands of homes that suffered damage from the Hurricanes. The program's eligible activities include construction of resilient affordable rental housing units for

projects that are eligible for funding under LIHTC which provide rental housing needs at affordable rents.

In 2016, McCormack Baron Salazar ("MBS") received 9% LIHTC allocations of 2018-2020 credits in the amount of \$8,602,239 and 149 project-based vouchers for the multifamily and elderly phases, which together constitute the redevelopment of the former Jose Gautier Benitez Public Housing Community.

These two Projects are comprised of 438 units (238 new multifamily units and 200 new elderly units) on the former Jose Gautier Benitez Public Housing site, split into two development phases. The Jose Gautier Benitez sites are surrounded by job centers and a variety of other neighborhood assets and amenities, making the sites ideal redevelopment sites. The Consolidated Medical Plaza, an office medical complex, is located directly across the street from the site. Parque Marigola Municipal Park is directly adjacent to the site; the park includes a small community center, recreation track, play equipment, and skate park. To the west of the site, the Plaza del Carmen shopping center includes a variety of major retail chains, including grocery stores, clothing stores, and a pharmacy.

MBS estimates these new developments will have a direct, indirect and induced economic impact of \$130 million during construction and \$17.6 million during administration and operation. Additionally, the developments are estimated to generate 811 full-time temporary construction jobs and 433 indirect and induced jobs during construction as well as 52 full-time positions and 48 indirect and induced jobs during the annual administration and operation when these residential communities are fully occupied.

The total development cost for the projects is \$132.767 million of which roughly \$66.445 million in Low Income Housing Tax Credit Equity, \$1.407 in deferred developer fee, and \$36.726 million in HUD Capital Funds and program income totaling 78.76% of the funding sources will be committed for developments.

Additionally, site and public improvement work in the amount of \$13.659 million will be done in conjunction with the Housing developments. Pursuant to the CDBG-DR Gap to Low income Housing Tax Credits (LIHTC) Program's eligible activities, we respectfully request Puerto Rico Department of Housing allocate \$41,849,667 in CDBG-DR funds to close the funding gap and successfully achieve the financial closing of these new developments.

McCormack Baron Salazar, RBC Capital Markets, and Citi Community Capital are committed to investing in the long-term recovery and restoration of affordable rental housing in Puerto Rico and have been working actively, with the endorsement of the Municipality of Caguas, towards the developments of these 438 affordable housing units. We appreciate your consideration and support to bring the Jose Gautier Benitez Elderly mixed-income I mixed-finance development to a financial closing."

PRDOH Response: Thank you for your comment. Information on how to apply for the CDBG-DR Gap to Low-Income Housing Tax Credit (LIHTC) program will be published as part of program guidelines when available.

Comment: #283_10-14-18_Carlos Burgos

"Regarding the draft Substantial Amendment to the Action Plan, the signatory is an Assistant Sheriff of the Judicial Branch of Puerto Rico. My legitimate wish is that, like our brothers in the Puerto Rico Police, we should be included in this plan as agents of public order that we are. That both the Marshals and Auxiliary Marshals can benefit from this plan; in the same way as other First Responders and the country's teaching class."

PRDOH Response: The Homebuyer Assistance program is not limited to the Puerto Rico Police. The definition of critical recovery workforce has been expanded upon in the Action Plan.

Comment: #284_10-11-18_Junta Comunitaria de Residentes Los Usubales

"For the participation of comments, request the assistance from the repair and reconstruction for the unmet needs and infrastructure in Urb. Usubales in Canóvanas from Hurricane María through the CDBG-DR funds.

Additional comments;

For the first round, comments were provided from which assistance was requested and we never received any response from the agency regarding the participation and commentary for the use of CBDG-DR funds.

We are sending again a second round of comments including the ones mentioned above.

According to the draft first-time action plan, it does not specify several points.

- *The participation of non-profit organizations and community leaders*
- *The requirements to request the funds*
- *Consider and know the needs discovered to raise the country*
- *The control of funds*
- *New public views with citizen participation*
- *Second phase of funding CDBG-DR funds*
- *Participation of comments for the second phase for the participation of comments of the draft action plan*

The action plan must be included;

In the record of the participation of previous comments and in the second part of the draft action plan should appear the names of all the participants of organizations, individuals, government and others,

Participation of community organizations, individuals, government and others, should be included in a registry to receive information on the use and management of funds and explain the hiring process for community leaders. How much participation.

The participation and mandatory integration of community leaders set organizations, community meetings, voluntary community networking and others of all the processes in each community that carry out the development for the recovery of funds CBDG-DR post María and Irma which municipalities have explained that you can not deny the participation of Community leaders the inspection and observation and recommendation in the manner of use and distribution for each community of funds and work to be done.

Regarding the displacements in the communities;

The list of municipalities must be published, with recommendations and evaluations already listed or considered of the alleged communities to be displaced throughout Puerto Rico.

The manner in which these movements will be carried out

The guarantees of the rights to the people to be displaced, the recommendations, the criteria of why they are going to displace them

Consultations with community leaders for the areas to be moved

The work plan for the displacement.

What they will offer displaced people in areas of high risk of flooding What alternatives to mitigate floods.

As for the recovery process, it has been slow year after the catastrophic passage of the Irma Marra Hurricanes. Many affected people continue to live without roofs and in old tarps.

The mitigation we consider that you all should do more to what has truly taken place because the current situation is the problem that affects the country, causing so many floods and losses in terms of the infrastructure in the energy part, you all should develop renewable energy models

These areas that should be mitigated especially we would mention

Dams that are currently in poor condition, channeling, lakes, rivers, streams. Construction of dams that protect communities, with a high degree of flooding to avoid displacements and other ...

Regarding the unmet needs, there are still many people who were denied the aid for one reason or another we do not know, it should include some items for necessities, solar panels and other

As for studies of flood areas, those communities with high flood risks due to their distance to a refuge should be included, when the one they had closed, as for example the only nearby refuge was a school.

These vacant schools must be handed over to the communities so that in the event of a disaster they can be facilitators to the refugees in coordination with state and municipal emergency management.

PRDOH Response: The comment and public hearing process for both the initial Action Plan and substantial amendment was open to the public and resulted in a wealth of information

exchanged. Hundreds of submittals from the public were received. Although each proposal may not have been referred to by name in the Action Plan, all submittals have been reviewed carefully by PRDOH and were considered in the development of the plan. Notification of public hearings was advertised on social media, in the newspaper, and in circulated newsletters, in addition to being posted on the PRDOH website, www.cdbg-dr.pr.gov.

PRDOH values ongoing collaboration with community leaders and looks forward to a continued positive working relationship with community groups and other stakeholders throughout the life of the grant. PRDOH is committed to leading a responsible and transparent recovery effort. As required by 83 FR 5844, PRDOH must post information related to its CDBG-DR Grant to its website for public consumption. Information including procurement policies, contracts, Quarterly Performance Reports (QPR), expenditures, program policies and procedures, and other related information will be posted to PRDOH's disaster recovery website at www.cdbg-dr.pr.gov as it becomes available.

All relocation contemplated in the Action Plan is voluntary.

Comment: #285_10-11-18_JW Jennings (Green Star)

Summary: Green Star submitted a proposal outlining a project plan to provide Puerto Rico with a "patent-pending system for 100,000,000 gallons of clean drinking water a day and 1,000 megawatts of power". The proposal outlines a description of the suggested projects, including cost estimates.

PRDOH Response: As mandated by HUD, PRDOH must follow HUD-approved procurement processes which encourage fair and open competition and comply with 2 CFR 200. Parties interested in contracting opportunities with PRDOH should monitor www.cdbg-dr.pr.gov for information.

Comment: #286_10-19-2018_Voz Activa Comunidad Organizada de San Salvador

Summary: Voz Activa submitted a proposal which summarized the impact of Hurricane Maria and suggests the following activities to be funded under CDBG-DR.

Infrastructure:

- *Construction of microgrids in Caguas*
- *Use CDBG-DR funding as a 20% stake in the financing of the project*
- *Leverage CDBG DR funding with Solar Investment Tax Credits which will provide a leverage of \$5 to \$1 (CDBG-DR)*
- *Partner with Community Based Development Organizations who will own and purchase the equipment provided*
- *Provide energy to LMI communities*

Economic Recovery:

- *The microgrid project mentioned above will create jobs in the installation, operation and maintenance of the system*

PRDOH Response: These projects and activities have informed PRDOH during the development of the Infrastructure and Economic Recovery Programs. PRDOH understands the importance properly repairing the condition of public infrastructure and is committed to pursuing projects that will create long-term resilience to natural disasters and hazards. PRDOH also understands the need for efficient alternative energy sources which will improve the resiliency for Puerto Rico. Through the Economic Recovery Programs outlined in the Action Plan, PRDOH is committed improving the economic landscape of the island by focusing efforts around post-storm economic recovery activities. Currently available information regarding these programs and program sectors is outlined in the Action Plan.

Comment: #287_10-19-2018_Municipio de Morovis

Summary: On 10/19/2018, the Municipality of Morovis submitted a proposal which summarized the impact of Hurricane Maria and suggested activities to be funded under CDBG-DR. Morovis suggests the following activities be funded under CDBG-DR funds. A total of \$86,373,074.00 is requested across all proposed projects laid out below.

Housing funds requested: \$27,809,074.00

- *Construction of 382 new housing units*
- *67 units - \$2,534,074.00*
- *Acquisition of 15 abandoned structures - \$1,275,000.00*
- *Development of 300 new units - \$24,000,000*
- *Material and equipment for waterproofing and a construction team or group that can assist for 2 years - \$4.18 Million*
- *Additional Material for reconstruction of housing*

Infrastructure funds requested: \$47,989,074.00

- *Solar panels for remote housing - \$1.5 Million*
- *New construction of 12 bridges in Morovis - \$4 million*
- *Additional Infrastructure and Economic Development projects - \$42,489,074.00*
- *Repavement of highways*
- *Development of green spaces and public parks in disadvantaged communities*
- *New cemetery construction*
- *Acquisition of 2 unused buildings in the urban center*

- *Reconstruction of the Coliseum*
- *Development of sports activities*
- *Construction of the Coe office*
- *Acquisition of Energy Efficient light bulbs*
- *Ball park stadium seating roof covering*
- *Construction of a heliport*
- *Acquisition of medical teams*
- *Acquisition of 3 trolleys*
- *Reconstruction of a basketball court*
- *Security system cameras for public works projects*
- *3,000 Cisterns for potable water*
- *2,500 solar powered water heaters*
- *Housekeepers program*
- *Training program for personnel managing federal funds*

Economic Development funds requested: \$5 Million

- *Urban center commercial development*

PRDOH Response: These projects and activities have informed PRDOH during the development of the Housing, Infrastructure, and Economic Recovery Programs. PRDOH is committed to implementing housing programs that meet the immediate housing needs of the most vulnerable populations by serving low-to-moderate income households and prioritizing the elderly population. PRDOH understands the importance properly repairing the condition of public infrastructure and is committed to pursuing projects that will create long-term resilience to natural disasters and hazards. Through the Economic Recovery Programs outlined in the Action Plan, PRDOH is committed improving the economic landscape of the island by focusing efforts around post-storm economic recovery activities. Currently available information regarding these programs and program sectors is outlined in the Action Plan.

Comment: #288_10-19-2018_Municipio de Loiza

Summary: Municipality of Loiza submitted a proposal which summarized the impact of Hurricane Maria and suggested activities to be funded under CDBG-DR. Loiza suggests the following activities be funded under CDBG-DR funds.

Housing funds requested: \$24,320,000.00

- *Playa Bahia Apartments Phase 1 - \$3,600,000.00 and Phase 2 - \$11,400,000.00*

- 31 New Housing units in the urban center for elderly and those who did not qualify for any other source of help - \$2.22 Million
- 22 units of Housing Rehab in the urban center for the elderly - \$440,000.00
- New construction of 100 units for families with small children, provide better sanitary housing, and eliminate blight - \$6.66 Million

Infrastructure funds requested:

- Mitigation and flooding controls - \$9 million
- Creation of a community service center which can service the elderly, disabled and other special interest community members - \$12.5 Million
- Relocate the Emergency Management Office from a flood zone - \$18 Million
- Center for Socio Economic Renewal to service new businesses and provide support services in the initial phases of business development - \$10 million

Additional Comments

- Requested the incorporation of the mayor during the decision-making process

PRDOH Response: PRDOH is committed to implementing housing programs that meet the immediate housing needs of the most vulnerable populations by serving low-to-moderate income households and prioritizing the elderly population. PRDOH understands the importance properly repairing the condition of public infrastructure and is committed to pursuing projects that will create long-term resilience to natural disasters and hazards. PRDOH values the participation of all mayors and municipios and looks forward to a working relationship at the municipal level throughout the life of the grant.

Comment: #289_10-19-2018_Municipio de Gurabo

Summary: Municipality of Gurabo submitted a proposal which summarized the impact of Hurricane Maria and suggested activities to be funded under CDBG-DR. Gurabo suggests the following activities be funded under CDBG-DR funds. Total of \$12 Million is requested which includes Housing and Infrastructure Proposed Projects.

Housing:

- Repair, Reconstruction or Relocation needs for residents.
- Additional Senior housing for Bo. Rincon from a rehabbed school campus.

Infrastructure:

- Highway, curb, and other urban road improvements.
- Installation of gabions and retention walls for Hato Nuevo, Celeda, Masas y Santa.
- Asphalt for roads.

- *Complete the Sports Complex.*
- *Rehab of two Cemeteries.*
- *Rehab of public plazas.*
- *Construction of an Emergency Intake center.*
- *Construction of a facility to be used as daycare center for children and those with Autism.*
- *Improvements to the municipal library.*
- *Expansion of the Bridge in Bo. Celada.*
- *Installation of solar plates in municipal buildings.*

Economic Recovery:

- *Digitalization of systems.*
- *Construction of an aquatic park for tourism.*
- *Business incubator program.*

Additional Comments

- *Requested more clarity in the Title program*
- *Requested to prioritize unmet needs*

PRDOH Response: These projects and activities have informed PRDOH during the development of the Housing, Infrastructure, and Economic Recovery Programs. The Home Repair, Reconstruction or Relocation Program allows for home rehabilitation or voluntary relocation to eligible applicants and prioritizes the elderly population. PRDOH understands the importance properly repairing the condition of public infrastructure and is committed to pursuing projects that will create long-term resilience to natural disasters and hazards. Through the Economic Recovery Programs outlined in the Action Plan, PRDOH is committed improving the economic landscape of the island by focusing efforts around post-storm economic recovery activities. Currently available information regarding these programs and program sectors is outlined in the Action Plan.

Comment: #290_10-20-18_Leslie Martinez

“The action plan establishes that there will be housing for the homeless. This population after Hurricane Maria has potentially increased.

We recommend rehabilitating empty and/or abandoned properties. Commission those who serve their sentence by training them in community micro aqueducts, renewable energy, home gardens and all the skills necessary to maintain a transitional home not only for ex-convicts but also for homeless people. The amount of housing to be rehabilitated must be proportional to the number of homeless and ex-convicts per Municipality.”

PRDOH Response: Thank you for your comment. PRDOH will take this suggestion into consideration during further development of the Social Interest Housing program.

Comment: #291_10-20-18_Wilmarie Pizarro

"I am a housing counselor for HUD certified agency in mortgage mitigation, I worked the national NMFC program with which we were able to rescue many foreclosure mortgages, in the plan presents the MORTGAGE CATCH-UP program. I understand that covering the months of the mortgage is a supportive solution to the problem of foreclosure because after 12 months the client will have his/her usual payment again and can relapse into arrears, as happened with the moratorium offered with the passage of Hurricane Maria. My suggestion is that those 20,000 be offered to clients who are over 55% of income vs. debts and this is applied to the principal, with them will permanently reduce what remains of mortgage payments and thereby ensure that the client does not relapse into arrears because their payment is already permanently lowered. The model you are using is the one used by Florida HARDEST HIL (UMAP) and you should use the model (MLRP) or both after 5 years working with mortgage prevention programs and the experience that I have lived with so many Puerto Rican families, I'm sure a study should bring a real solution as U.S.A. did with reference to other program models <http://www.flhardesthithelp>."

PRDOH Response: Thank you for your comment. PRDOH will take these suggestions into consideration during further development of the Mortgage Catch-Up program.

Comment: #292_10-20-18_C rmen Villanueva (Comunidad Hill Brothers Sur in Rio Piedras)

Summary: The Hill Brothers Sur submitted a proposal which includes a description of considerations for designated special communities under Law 1 of 2001 and Law 10 of 2017. The proposal states that Hill Brothers Sur were not consulted by San Juan and outlines the following suggestions for inclusion in the Action Plan.

"Our Community Hill Brothers Sur has a Comprehensive Plan that exposes its short and long term needs, this was designed along with the community by the firm Jose Marcano & Associates, supervised by the Department of Transportation and Public Works and the Office of Special Communities. It is well known that after Hurricanes Irma and Maria our reality is different and that is why we want the following to be included within the specific suggestions that impact our community in the Action Plan:

The Department of Housing as part of compliance with the Special Communities Act and based on the PDI of the community, was transferred to the members of the Community, 6 plots that were drawn among 6 families. The Department's process was interrupted in this administration for the following reasons:

- first because of the lack of confidence and the no validation of the granting of plots,*
- second, the delay of the process by the Department of Housing to segregate the plots, and*
- third, sources of financing accessible to families to build their homes.*

While waiting, two of the families looked for other alternatives to get their home and one of the cases was disqualified. This is why we ask that families who totally lost their homes in our community be evaluated and their alternative is new construction, to be beneficiaries of these plots granted to the community and thus complying with the Special Communities Law. In addition, that they can be evaluated through CDBG funds to build their homes for the 6 families. It is important to know that there is a structure in one of the plots that only needs maintenance and was repossessed by the Department of Housing. These facilities were compromised for the community and are in the records for more than 15 years through assembly and under administrations of both parties. It is urgent to work these cases because of the situation of anguish that these families live. They are second to fourth generation families in the community.

The community has the Quebrada la Margarita also known as Los Ruices. The foundations of 7 homes have been undermined, leaving them on the edge of possible landslides, as well as 4 other families where the road that gives them access is undermined and allows limited access to them. At the moment the ambulances and pieces of garbage collection do not want to transit through it. We need that within the mitigation funds the community can have an allocation to work with these cases and prevent these homes from being lost and prevent a human misfortune.

We ask that our lighting system be evaluated in order to change it for solar energy bulbs, this because of the high population density that we have.

We respectfully suggest that our suggestions and requests to be included in the CDBG-DR Action Plan and the study of how much potential it is at this time to use the figure of the Perpetual Trust to rebuild in the special communities and to create confidence in the Federal Government about the fulfillment of this plan.

We reiterate our availability and willingness to work along with the Department of Housing in the achievement of the Country we want."

PRDOH Response: Thank you for your comment. The Whole Community Resilience Planning program offers an opportunity for communities to create long-term plans for thoughtful and resilient community-wide recovery. PRDOH anticipates that guidelines for this program will be published in the first quarter of 2019 to www.cdbg-dr.pr.gov.

The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #293_10-19-18_Drustva Delgadillo (KaBOOM)

"On behalf of KaBOOM!, a national non-profit dedicated to ensuring that all kids get the childhood filled with the balanced and active play needed to thrive, we would like to thank the Puerto Rico Department of Housing for the opportunity to provide comments in response to the Puerto Rico Disaster Recovery Action Plan (Amendment 1, Sept. 21, 2018).

As municipalities, city planning agencies, NGOs and community stakeholders work together to rebuild Puerto Rico, we strongly encourage that rebuilding and resilience planning efforts – including those described under the Multi-sector initiatives, City Revitalization Program (pg. 186), and Community Resiliency Centers (pg. 182) – consider the inclusion of and equitable access to recreational and play spaces for children and youth.

The health benefits of play: At KaBOOM! we know how transformative – and magical – a playground can be for children, especially for children living in poverty. Without great places to play, children have less access to the wide-range of benefits play provides for cognitive, physical, social, and emotional health:

- Play is linked to healthy brain development during the early childhood years. [1]*
- Children who take part in free play gain important social-emotional skills – such as confidence and resiliency – while improving their abilities to share, negotiate, communicate, and cooperate with their peers. [2] [3]*
- Increased physical activity during play can also lead to decreased risk of obesity and diabetes and improved bone health. [4]*
- Play provides parents an important opportunity to spend time with their children, which is conducive to maintaining strong parent-child relationships and social cohesion. [5]*

City revitalization efforts that incorporate play spaces and multi-generational recreational areas have been proven to be powerful drivers for greater community cohesion and economic vitality. To this end, we encourage the Puerto Rico Department of Housing to place priority on city revitalization plans that include accessible and safe areas where children and youth can play, have fun, and regain their sense of normalcy.

Providing play opportunities following a disaster or crisis: Children are exceptionally vulnerable to experience significant stress and grief during and after a natural disaster or emergency. Research has shown that exposure to adversity – such as a severe disruption to their daily routine and sense of security following a crisis – can increase a child’s heart rate, blood pressure, and production of stress hormones, such as cortisol [6]. Children who experience frequent or prolonged levels of toxic stress can have lifelong health consequences that disrupt or impair healthy child development.

A child’s ability to respond during and after a disaster relies heavily on their home and community environment. When a child is surrounded by supportive and caring adults and mechanisms that provide buffers to their stress responses, children are able to “bounce back” emotionally and physiologically [7]. To this end, we encourage the Puerto Rico Department of Housing to require each community resiliency center to include resources and tools — such as mobile, safe playgrounds – to help restore children’s access to play and help bring normalcy back to their lives.”

PRDOH Response: Thank you for your comment. PRDOH will take these suggestions and information into consideration during further development of programs or during development of new programs if additional funding becomes available.

Comment: #294_10-19-18_Armando J. Rodriguez (Grupo HIMA San Pablo)

"According to the draft of the substantial amendment to the approved Action Plan, the impact that Hurricanes Irma and Maria had on the services of hospitals and primary care centers was significant. At present, the network of private and public medical services in Puerto Rico are not

sufficient to satisfy the demand for services that is predominantly served by private hospitals and sponsored by the health insurance plan of the Government of Puerto Rico.

Therefore, and in response to the need to develop infrastructure and recruit over 900 new jobs, we request that the Action Plan include the allocation of funds to address a proposal for economic development by the Turabo Medical Center Corporation (CMT), which is the parent corporation of the HIMA Group• San Pablo that operates five hospitals in Puerto Rico; Hospital HIMA• San Pablo Caguas, Hospital HIMA•San Pablo Bayamon, Hospital HIMA• San Pablo Fajardo, Hospital HIMA• San Pablo Humacao, and Hospital HIMA• San Pablo Cupey.

The HIMA-San Pablo hospital system faces a significant challenge to improve and expand the specialized and sub-specialized services on the Island. As the largest employer in the eastern region of the country with 4,875 employees, the Hospital Group is interested in expanding the specialized and accredited medical care services unique in Puerto Rico such as the Oncology Hospital accredited by the Cancer Commission of the “American College of Surgeons (ACS)”, the only Primary Stroke Center (STROKE); the only burn center in Puerto Rico; among other subspecialty services.

It is for this reason that we seek the attention of the Government of Puerto Rico so that the usage of funds of the CDBG-DR plan may sponsor a proposal for the amount of \$350,000,000.00 to give a "grant" or financing to the half percent of interest for the economic revitalization of the hospitals in order to remodel, expand, modernize, equip facilities, or refinance debts that allow us to strengthen the specialized medical services that the Island requires".

PRDOH Response: Large transformative projects which create jobs and/or cascading economic impacts may be eligible for funding under the Economic Investment Portfolio for Growth program. Currently available information regarding this program is available in the Action Plan.

Comment: #295_10-20-18_Gilberto Perez Valentin (Municipio de Maricao)

"It is worth mentioning that the Municipality of Maricao belongs to the Central Region of the Mountain and that we were one of the most devastated sectors caused by Hurricane Maria because it is one where our infrastructure is very fragile and deteriorated. This caused our town to be isolated for several months.

As a fully agricultural town, the Hurricane caused our farmers not only the loss of their homes, but also the loss of their crops, which was their only livelihood, and raising agriculture again takes 3 to 4 years.

A large part of our population obtains their income from agriculture, which does not allow them to have their houses in perfect conditions to withstand the winds of 100 mph which caused their fragile houses to be totally and partially destroyed. None of them can claim insurance because they are not insured.

All the accesses to our municipal roads were devastated by heavy rains and landslides. So much so that it took us three months to reach many of those families who lived in the rural area in order to give access to their residences.

That is why we are requesting that our town of Maricao be considered as a priority to other municipalities that were not affected; at the time of providing the allocation of CDBG-DR Funds and that the areas such as Housing, Infrastructure and Agriculture be urgently served.”

PRDOH Response: Programs in the Action Plan are not geographically restricted within Puerto Rico. Residents of Maricao may be eligible to receive assistance.

Comment: #296_10-20-18_Samuel Gonzalez Cardona (United Way of Puerto Rico)

“United Way of Puerto Rico recommends that the federal government be asked to exempt the non-profit organizations of the rule for the reimbursement of the CDBG and other recovery funds and let them receive the funds in advanced.

Therefore, UWPR recommend that the payments could be arranged as follows: o advance of 40% to start the projects o advance of 30% in a second payment with the submission of a partial report o A refund of the remaining 30% with the submission of a final report.

This support is request, because of the leading role taken by the non-profit sector, and they proved to be the first line of aid to the community during and after the crisis of Hurricane Maria. During the disaster the non-profit affiliated to United Way Puerto Rico performed invaluable work in our communities. Most of them served over 15,000,000 of prepared meals, more than 50 non-profits were disaster donations coordination center, provided over 29,000 case management sessions, provided over 43,600 mental health counseling sessions, offered over 26,300 nights emergency shelter, over 14,500 people received help to pay medical expenses, over 14,900 families were connected thru satellite communication. UWPR affiliated non-profit support over 2,400,000 people during the hurricane aftermath.

Hurricane Maria showed that the non-profits were a key in the emergency response and the recovery of the Island. However, they are facing economic challenges. One survey conducted by United Way of PR between November 2017-January 2018 shows that our organizations have an account receivable of \$12,336,293 by different Puerto Rico’s Government Agencies. This is one of their major sources of funds, who represent 30% or more of their income for 33% of them according to a study conducted by United Way of PR on May 2015. During the performance evaluations carried out in March 2018, it was found that 72.1% of the affiliated non-profit have accounts receivable and a 18.5% of them have overdo accounts for more than 7 months. The evaluation also showed that 25.6% of the affiliated non-profit have credit lines and for 42% of them, it represents an economic burden. They had other loss of sources of funds like special events, individual investors and corporate gift. This situation impacts their capacity for provide programs and services to the community and reduction or even shutdown of services.”

PRDOH Response: Thank you for your comment. PRDOH has taken this into consideration. The Action Plan offers multiple opportunities for NGO’s to apply for assistance. PRDOH values collaboration with non-profit organizations throughout the life of the grant.

Comment: #297_10-20-18_Jardany Diaz Salgado (Municipio de Luquillo)

Summary: The attachment lists potential projects and detail the unmet need, the activities needed, how the project complies with a national objective for CDBG-DR funding, the cost estimate for the project, other sources of funding available for that project and the itinerary for the project.

Housing

1. Creating new housing for low- and moderate-income people in properties that are currently abandoned or dilapidated"

Estimated cost \$5,500,000 for 20 new units and first time homebuyer assistance with a focus on veterans

2. "Housing Rehabilitation"

An estimated \$300,000 total assuming each unit will be \$15,000

3. "Transitional housing"

"\$2,000,000, including remodeling and equipment"

4. "Emergency Shelter"

"1,000,000 including remodeling and equipment"

5. "Rehabilitation of the Kiosks of Luquillo"

"\$2,500,000 , including repairs to common areas and mitigation to avoid future disaster damage"

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipals to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors. Municipals must submit applications for consideration and approval by PRDOH after the program begins.

Comment: #298_10-20-18_David Haddock (Fundación Comunitaria de Puerto Rico)

Summary: The proposal submitted outlines the contributions of Fundación Comunitaria de Puerto Rico immediately following Hurricanes Irma and Maria. During the period following the storms, the Foundation granted \$1.8 million in immediate assistance to more than 120 organizations. The proposal offers the following suggestions regarding the Action Plan:

"The following are some recommendations that we would like you to consider, and we are available to discuss them in the forums that you consider appropriate.

Working capital fund

CDBG-DR funds will be provided through a credit line from the Housing and Urban Development (HUD), which must be requested by the government of Puerto Rico, as progress on the initiatives proposed in the Action Plan is needed. It is our understanding that nonprofit organizations that are participants in CDBG-DR grants or funds will receive the money for reimbursement. That is, they have to provide services and operate with their own funds, and then apply for reimbursement.

Based on our experience with the FIC, and as a partner of nonprofit organizations for the past 33 years, we know that the vast majority of nonprofit organizations find it difficult to operate and cash flow when they have to incur expenses, pending refunds following a billing process. What's more, we know of instances that have turned to FIC, our loan program, to request cash advances in a way that allows them to retain their employees and maintain their operations.

To address this issue, we present two recommendations:

- *Cash advances. That the CDBG-DR fund guidelines may allow cash advances (a first payment advance) to selected nonprofit organizations that participate in Action Plan programs. This provides them with financial capital so that they do not have to resort to indebtedness and reduces the risk of programmatic noncompliance. The disbursement of the second payment should be subject to compliance with the plan and budget related to the first quarter received as an advance.*
- *Capital Access Fund for Non-Profit Organizations. That the Community Investment Fund of the FCPR be considered as the proven mechanism that provides operational capital to nonprofit organizations. The capitalization of the CIF provides an opportunity for organizations to receive advances (through loans) to operate while waiting for reimbursement of CDBG-DR funds. This capital access structure would allow nonprofit organizations to participate in CDBG-DR funds, retain jobs, and in turn, provide stability to the nonprofit sector in reconstruction initiatives. It should be noted that the terms and conditions, as experienced by the FIC, are comfortable and tailored to nonprofit organizations. Moreover, the interest rate is lower than the traditional financial market."*

PRDOH Response: Thank you for your comment. PRDOH has taken this into consideration. The Action Plan offers multiple opportunities for NGO's to apply for assistance. PRDOH values collaboration with non-profit organizations throughout the life of the grant.

"Definition of Communities

Through the Action Plan, the concept of community is mentioned in various functions. For example, in the proposed Comprehensive Community Resilience Planning program, the "community" is mentioned as affected, beneficiary and/or proponent (applicant). Also, in the same section of the plan, high-risk communities are mentioned, and in other parts of the plan, special communities are mentioned. Being an important part of the Action Plan (Integral Planning of Community Resilience), and having other instances where the community is mentioned, it is convenient to define and specify better what is referred to by community, or at least, that there is a definition and conceptualization as a reference. The definition would make clear the minimum community eligibility and clarify whether it refers to a geographic community as opposed to a

community of people with common interests. Moreover, it would be useful to know whether the community is eligible on its own, or through a non-profit organization.

The definition of communities is very broad, so it would be convenient to specify it in the different programs of the Action Plan. Leaving this wide margin can lead to interpretation in different ways, leading to the process of preparation and approval of guidelines to define eligibility equally broadly, when the intention is that the community be represented by the third sector”.

PRDOH Response: Thank you for your comment. The Whole Community Resilience Planning program offers an opportunity for communities to create long-term plans for thoughtful and resilient community-wide recovery. PRDOH anticipates that guidelines for this program will be published in the first quarter of 2019 to www.cdbg-dr.pr.gov.

Boosting Solar Communities

The Action Plan, starting on page 143, addresses the issue of energy and proposes a series of incentives focused on the acquisition of energy systems and basic appliances that operate with gas for the benefit of families. Little is mentioned about collective solutions of solar energy or another source of energy. As mentioned in a previous paragraph, the FCPR has promoted the first solar community in Toro Negro in Ciales; and has presented its documentation to be formalized as such before the Puerto Rico Energy Commission. We would like to suggest that the Action Plan include some type of incentive or block of donations to help promote this type of communities in other areas of Puerto Rico.

It could focus on the potential to provide government support for communities with over 10 families (residences) wishing to be energy independent, who could be given an incentive/donation to cover 80% of the cost of the system, and the remaining 20% could come from philanthropic capital. According to our experience with Comunidad Solar Toro Negro, Inc., the cost to connect 28 residences to several micro grids exceeds a quarter of a million. However, each community has to be addressed in its context (organizational, social and topographic).

PRDOH Response: Thank you for your comment. The Community Energy and Water Resilience Installations program aims to provide renewable, sustainable energy sources, like solar, to small businesses and residences.

Community Assistance Center

In some programs of the Action Plan, it is proposed as a method of distribution (sub-recipient) to nonprofit organizations. Our hope is that nonprofit organizations can take advantage of this opportunity to contribute to the recovery process. For this, we propose the Community Assistance Center, as a program of the FCPR or an affiliate of the FCPR. This Center will be the liaison for community-based nonprofit organizations to strengthen the organization and management of these organizations, and lead them to a better position to apply for and manage CBDG-DR funds. This Center would be in charge of the following, among other direct services or through training and accompaniment:

- *Strengthen its Boards of Directors*
- *Establish internal controls for management and handling of funds*

- Increase knowledge in programmatic compliance
- Apply for tax exemptions (local and federal)
- Prepare proposals
- Strengthen accountability systems

Our recommendation is that CDBG-DR funds can be allocated for the creation of this Center.”

PRDOH Response: Thank you for your comment. PRDOH has taken this into consideration. The Action Plan offers multiple opportunities for NGO’s to apply for assistance. PRDOH values collaboration with non-profit organizations throughout the life of the grant.

Comment: #299_10-21-18_Roberto Silva (Congreso de Pescadores de PR, Inc.)

"The Congreso de Pescadores de PR, Inc. is a non-profit corporation that gathers fourteen associations, with a waiting list of approximately eight additional ones to be included in the work plan of the congress, in this way it would include the most important associations of the island. The mission of Congreso de Pescadores de PR, Inc. is to educate, unite, organize and develop a new vision of commercial fishing in Puerto Rico.

We respectfully express our interest that commercial fishing activity be included in economic development following the devastating hurricane Maria.

Commercial fishing is one of the sectors that can recover fastest and begin to produce food, not being less important agriculture, but the process of a plant takes months in its growth to produce. In contrast, once the fisherman is encouraged in 30 days or less is producing lobster and fish to feed us in an emergency which places us in a privileged place in the food sustainability of Puerto Rico.

Despite these positive characteristics, fishing needs to be strengthened and helped as it suffered damage after the onslaught of Hurricane Irma and Maria, many lost all their fishing gear and the aid received has been very little and late. We understand that it has not been easy for everyone, but we have lost perspective on how important and effective Puerto Rico's artisanal commercial fishing can be in case of emergency.

Today we ask this honorable commission that fishing be included in Puerto Rico's revitalization model so that this valuable protein is not lacking in the food of Puerto Ricans.

We cite several of the modalities, damages and losses that we understand should be taken into consideration:

- *Outboard Engines - The most common outboard engines used by fishermen are between 40 and 115 horsepower. At the moment our fishermen's engines are deteriorating as their cost has increased by 70% and the Department of Agriculture only encourages \$1,000.00 when an engine is worth \$7,000 to \$10,000 dollars; this has caused fishermen to be economically disadvantaged to acquire new outboard engines.*
- *Diesel Engines- In the few 31 feet and up boats that use diesel engines have an average of 25 years or more, which their engines are deteriorated.*

- *Boats - The engines and commercial boats of Puerto Rico, 50% of them, are in a high deterioration. Due to these conditions of our boats annually register accidents, including deaths, since to handle our rough seas with boats of 18-22 feet is extremely dangerous.*
- *Carts- The carts are to be able to take our ships to a safe place in the moment that atmospheric disturbances approach.*
- *Electronic equipment- The electronic equipment with their due training would maximize the fishing capacity of our artisan fishermen.*
- *Pot lifters- We currently have fishermen who lift pots manually where the average weight of each pot is 50 pounds and then add 80 feet deep, this is done without the help of a gasoline or hydraulic pot lifter. This extreme physical effort often injures the angler making it impossible to look for sustenance for weeks.*
- *Pots gears. The pot is one of the fishing gear most used by commercial fishermen in the Caribbean for its effectiveness in catching lobster and fish. The lack of these materials has sometimes forced them to use inadequate materials.*
- *Swordfish fishing systems - The swordfish fishing system is a new threshold that the Congreso de Pescadores de PR, Inc. is trying to develop as a new alternative after the regulations that are imposed on the fisherman every day.*
- *FAD (Fish Agregating Device) is a modality used to attract pelagic fish, i.e. Dorado, Petos and Tunas.*
- *Diving equipment - Diving is a very lucrative commercial fishing modality.*
- *Educational programs- The average age of commercial fishermen is 61 years although young people have discovered that in fishing there is a great opportunity to do a decent job and well paid, but there is still more to be done. It is necessary to educate them in skills and conservation of the resource and other modalities such as mariculture and aquaculture.*
- *Infrastructure- Our associations were devastated after the hurricane Maria, but the fishing villages have great economic potential as tourism, achieving the development of small restaurants (chinchorros) where tourists and locals can eat fresh fish of the day in a natural environment on the beautiful coasts of our island. For example, Luquillo, a touristically important town that has El Yunque and one of the most important beaches in Puerto Rico, and the Association of commercial fishermen El Tinglar does not have a fishing village.*
- *Ramps and docks - Currently in eastern Puerto Rico there are only two partially usable ramps: Las Croabas, Fajardo and Hucares , Naguabo. The docks were destroyed by the waves of Hurricane Maria. This situation greatly complicates our operations, due to the deterioration of the facilities the vehicles and the carts of the boats are broken in many occasions leaving them inoperative.*
- *Tourism- The fishermen are the most appropriate people to offer this service, because we know like no other where the fishing is. With suitable and presentable boats for this*

purpose, with a training program that trains them would be a highly attractive formula for our visitors.

- *Mariculture- This modality is reaching a place of importance in the food sustainability of many countries. In Puerto Rico its effectiveness has been proven but it has not been given the importance it deserves being an activity that can be worked by the highly qualified scientific community of Puerto Rico and our fishermen, creating multisectoral jobs.*
- *Mangrove and Coral Planting - In the mangroves begins almost all life next to our Caribbean coral reefs that surround the island of Puerto Rico. They were seriously affected by Hurricane Maria and need to be restored to ensure sustainable fishing for us and future generations.*
- *Safety Equipment - The safety equipment and training of its use is an activity always postponed and forgotten claiming lives of our companions, as the fishing activity has been categorized as one of the most dangerous jobs on earth. There is a Puerto Rican trained in Alaska to conduct safety skills trainings and develop a shipwreck protocol. This is vital in commercial fishing.*
- *Communication equipment- We have had fishermen who have been rescued dying on the Colombian coast, after weeks "adrift", just for not having an EPIRB (Emergency Position Indicating Radio Beacon) or a communications radio. Training them in their proper use is vital as it could result in life or death.*
- *Fishing gear - This constitutes the fishing materials necessary to carry out the activity and maximize the potential of valuable human resources that account for this socio-cultural activity that has been so important to our island.*

This is a brief summary of the urgent needs of this noble sector that are the commercial fishermen of Puerto Rico. The Congreso de Pescadores de PR, Inc. is attentive to provide any other information. It is part of our mission to educate and encourage commercial fishing in Puerto Rico. Commercial fishing is an economic and employment engine guaranteeing the food sustainability of our island, which was seriously affected after Hurricane Maria. Collection centers or villages capable of operating in situations of natural disasters would put the fisherman in a position to go fishing and supply food to our population immediately.

We are an important part of the economy, jobs and food sustainability. The Congreso de Pescadores de PR, Inc. we are in the best disposition to abound in what would be facing fishing by 2018 and develop a resilient fishing industry. We ask that any action to be taken regarding the commercial fishing of Puerto Rico must be taken through the bonafide fishermen of Puerto Rico. The great mistakes that were made in the past were the result of decision making by people who thought they had the necessary knowledge to manage this sector.

The Congreso de Pescadores de PR ,Inc. is in the best disposition to collaborate in the development of any project in an integral way with the sector to be served, the commercial fishermen of Puerto Rico.

PRDOH Response: The Re-grow PR Urban-Rural Agriculture program is a food security initiative which may provide assistance to urban or rural, large- or small-scale agriculture,

livestock or aquaculture installations. The Small Business Financing program provides grants or loans to small businesses, which may include fishing businesses. Thank you for your comments. PRDOH will take them into consideration during further development of the program.

Comment: #300_10-21-18_Joanne Ferguson-Twiste (Destination Puerto Rico)

“The storms of 2017 were but the latest in a series of unfortunate calamities that have stunted Puerto Rico as a society during its recent history. Impossible also to forget are the more than a decade old economic depression, the government bankruptcy, the drought of 2015, and the Zika virus fiasco of 2016. Hurricanes Irma and Maria seemed to have sealed our fate as a people destined to incessant ruin.

A mistaken impression that cannot stand. We cannot allow it. There is no reason for it to stay on that course, because we have a renewed sense of purpose. Especially in our tourism industry, which stands ready to help turn Puerto Rico’s fortunes around. We have the natural beauty, the historic sites, the culture, the strategic location, the infrastructure, and most importantly, the people.

What we lack are the resources to change the narrative on Puerto Rico around the world. Tragically, the sources of funding for the promotion of Puerto Rico as a destination were directly compromised by the hurricanes. Understandably, the bankrupt Puerto Rico government will have other rebuilding priorities to attend to with its meager resources, further aggravating this negative cycle.

Access to new funding sources for tourism promotion activities, advertising, and marketing, like the Community Development Block Grants, will represent a total return of investment for the taxpayer. Augmented positive awareness of our islands will result in increased visits, which in turn will boost the revenues of tourism related activities like hotels, restaurants, tour operators, attractions, venues, retail stores, and national parks, including federally run historical sites and forests. This will obviously revitalize the tax revenue of the local, territorial and federal governments, which will eventually allow for the self-sustenance of our promotion efforts.

Moreover, tourism is one of the last labor-intensive industries in our country, and it employs primarily low to moderate income citizens, which is one of the most distressed populations during natural disasters. As our most precious resource, our people need jobs above all. And our people face competition from neighboring islands, countries that have weak labor legislation, which gives them an inordinate financial advantage over us that other States of the Union do not face from their immediate neighbors. If one is to take a look through the top global travel and tourism publications, Puerto Rico is invisible. Our neighbors are not. This disparity we need to reverse with great urgency, and it will only take an immediate influx of seed money to accomplish it. The operative phrase here is seed money. Once we launch a coherent, effective, and widely distributed promotion campaign it will become self-sustaining, which will help save further taxpayer funding for other critical matters in the future.

We trust that the U.S HUD will share this vision, as it has done with other United States jurisdictions with challenges like ours, and lend us a hand by allocating funds directed towards

tourism promotion led by Discover Puerto Rico, so we can lift ourselves up, and fully realize the potential that tourism holds for us.”

PRDOH Response: Thank you for your comment. PRDOH agrees that tourism economy is an important part of the recovery efforts. For this reason, PRDOH has included the Tourism and Business Marketing program in its Action Plan.

Comment: #301_10-21-18_Ivis Garcia Zambrana (The University of Utah)

“Overall, the DRAP is a strong document covering many areas of need. The Goal of Public participation and social capital building is excellent and should be institutionalized throughout all sector investments. There is however, a need for attention to the areas set down in the comments that follow. These comments were compiled by various methods (emails, Facebook, conferences, telephone conferences, community meetings, etc.) through Planners for Puerto Rico which is a network of planners that include academics from the Association of Collegiate Schools of Planning (ACSP), the American Planning Association (APA), La Escuela Graduada de Planificación (EGP) en la Universidad de Puerto Rico, the Sociedad Puertorriquena de Planificación (SPP), and the Center for Puerto Rican Studies. The comments are organized by theme. We did not exclude or filter any comments, so they do not reflect any particular point of view. We’re just trying to make sure you get the most public comments possible for a plan that will shape the future of Puerto Rico in the coming years.

1. Planning

- Resilience is not actually defined in the DRAP, and used in different contexts throughout, and is applied differently in various subsections. Clarify and define this term. Two suggested definitions offered here. A passive definition: the capacity of a community, region, to survive a major disaster; retain its essential structure and functions; and adapt to current and future challenges. A community is resilient when it maintains continuity and recovers quickly despite experiencing disaster events. An active definition: Intentional action that assists a system component (i.e., infrastructure) to absorb shock or disturbance (chronic or acute), maintain its structure, function with a minimum of loss, and adapt during recovery to meet challenges posed by changing conditions. Note: neither of these definitions are aspirational, this making them more useful as operational guidance.”*

PRDOH Response: Resilience, as used throughout the Action Plan, is in line with the definitions outlined in your comment and will be further elaborated upon within the program guidelines or subject area where it appears as programs are launched. In general, resilience as it appears throughout the Action Plan goes a step further than the comment above in that we are looking at both macro and micro levels -including the household and individual scale – not stopping at community or region. An example of this would be the Community Energy and Water Resilience Installations program – which focuses on both individual and community scale interventions – and it fits both definitions.

2. *“There is a total lack of attention to land use planning issues. This, it appears, tend to be subsumed under the discussion of rebuilding in the floodplain, and the whole community approach. This is an oversight, as land use planning in PR is integral to overall disaster risk reduction, and to the location of infrastructure projects. Provide direct guidance in the DRAP on how land use planning is to be utilized for disaster risk reduction and guidance on where to place infrastructure investments.”*

PRDOH Response: Mechanisms to incorporate and support land use planning are included in the Action Plan, as functions of Agency Planning Initiatives and Whole Community Resilience Planning. Further, the Action Plan should not be viewed in a silo with respect to other land use planning or other planning efforts underway on the Island, and in fact HUD provides direction to this end in the Federal Register Notice. In addition, land use planning will be considered as a function of other recovery programs such as Critical Infrastructure Resilience and the City Revitalization Program, as just two examples. Your input is helpful, and as program guidelines are developed this feedback will be instrumental.

3. *“It is not clear why the municipalities will produce their own LHMPs while COR3 produces the Commonwealth Hazard Plan. It would be useful if they inform each other.”*

PRDOH Response: This comment would be best addressed by direct inquiry to COR3, but we will offer our understanding. The development of local hazard mitigation plans under an over-arching Island-wide hazard mitigation plan is a requirement of FEMA, and these must be updated every five years. Some local jurisdictions may have no local hazard mitigation plan. Updated hazard mitigation plans are essential for local jurisdictions to be able to submit applications for Hazard Mitigation funding under FEMA 404. If a local jurisdiction does not have an updated Hazard Mitigation plan, they are ineligible for participation in this program. The COR3 is the coordinating body that is responsible for the comprehensive coordination of all plans under the comprehensive plan, and COR3 is the responsible entity/agency that serves as the emergency management authority coordinating directly with FEMA. All states have a central, statewide agency or entity that serves in this same way, with a designated State Hazard Mitigation Officer who coordinates all mitigation activities of local jurisdictions.

4. *“Just wished to say that the housing proposal to spend the CDBG DR funding reads like a menu that has something for everyone. It would be more useful if it was linked to a strategy that recognizes priority funding that supports capacity building in the economic and the build environment domains. Recommendation: focus more on housing. What two single changes would make the Housing Plan stronger?”*

PRDOH Response: The Action Plan is a comprehensive, holistic, transformative plan that is based upon the unmet needs analysis. In this way, your comment is very accurate and appreciated, in that the devastation of Hurricanes Irma and María was also holistic – it was Island-wide. The entire Island is a declared disaster area. As such, the methods of distribution (programs) must be comprehensive and holistic, and offer solutions to address needs at all levels. Regarding capacity building in the economic and built environment

domains, we suggest reviewing the details of the economic recovery programs, infrastructure, and multi-sectorial programs. Regarding housing – total investments housing-specific programs planned as of this Action Plan Amendment are \$3.661 billion. Other investments of course are also related to supporting housing recovery, such as revolving loan program for construction companies. We welcome your input on two single changes to make the plan stronger.

5. *“I was looking at some earlier resilience analysis that lacked complete multi-hazards analysis from a land use suitability standpoint, the island is potentially susceptible to landslide, tsunami, earthquake, wildfire, multiple forms of flooding, sea level rise, hurricane and probably a few others I am forgetting... hopefully the policy level plans are backed by sound land use analysis.”*

PRDOH Response: Thank you for your comment. Yes, we are susceptible on the Island of Puerto Rico to a number of challenges, and we recognize the further challenges presented by environmental changes. As indicated in response above to question #2, land use planning is incorporated in a number of programs, and will be further outlined in program guidelines as programs are launched.

6. *“Planning: Is now a good time to talk about growth boundaries?”*

PRDOH Response: While the comment is a little unclear, PRDOH will offer our best input. Puerto Rico is an island, so we must always consider growth boundaries, because our land is not limitless and it comes with a multitude of hazards and risks associated with coastal flooding, riverine flooding, landslides, etc. as mentioned in the comment above. As such, yes, we do consider growth boundaries.

7. *“What is the role of the municipalities in the implementation process of the Action Plan?”*

PRDOH Response: The Housing Department values the strong working relationship with municipalities, and the important role of municipalities in the recovery efforts across the Island. Within the various programs outlined in the Action Plan, municipalities will have a variety of roles, and further information can be found within these programs. In some instances, municipalities will be participating in, supporting, and leading efforts within community resilience planning, and in other instances will be developing projects for funding consideration under programs such the City Revitalization Program.

8. *“What are the best ways to harness visionary thinking?”*

PRDOH Response: This is a great question, thank you. There are multiple avenues to harness visionary thinking which PRDOH has incorporated during Action Plan development and will continue to incorporate in program design. We believe in robust community and stakeholder engagement at all levels, as well as providing opportunity for public comment such as this process. Each program within the CDBG-DR portfolio will evolve over time to respond to community, individual, and Island-wide needs over the recovery life cycle. Accordingly, there will be opportunity for visionary thinking to be integrated through

ongoing community engagement. Some programs also include participatory planning processes (Whole Community Resilience Planning) and others are larger scale on a major initiatives approach (Puerto Rico by Design) where visionary thinking will come in the form of a competition. The Home Resilience Innovation Competition also is focused specifically on harnessing visionary thinking.

9. *“Who do you see collecting data in the future?”*

PRDOH Response: All CDBG-DR programs will be collecting data as a function of practice, to understand efficiency and insure intended benefits are reaching intended beneficiaries. Further, HUD requires reporting on programs on a quarterly and annual basis. On a greater basis the Puerto Rico Innovation and Technology Service will also be collecting data across the island and integrating efforts between agencies.

10. *“Who from the government or private company used drones (unmanned aircraft systems) to help with post disaster recovery planning? I'm interested in getting names and contact info.”*

PRDOH Response: We do not have information on this topic, but the COR3 may be able to provide this information.

11. *“How is a high capacity rural organization defined? What is the criteria used for identification? How are they identified? How many are there in Puerto Rico?”*

PRDOH Response: Thank you for your comment. Further information on this subject will be outlined in program guidelines.

12. *“The “multi-sectoral” assignment is new in the Action Plan amended, why is that? What are you looking for?”*

PRDOH Response: As indicated in the Action Plan, multi-sectoral is used to identify programs, incorporate aspects of, or provide benefits in each of the four sectors: economic development and revitalization, infrastructure, planning, and housing. Similarly, these initiatives involve a variety of potential subrecipients at different scales, depending on the scope of the initiative.

13. *“The amendments to the CDBG-DR action plan in August include multi-agency programs. What are those? What is their purpose?”*

PRDOH Response: Thank you for your comment. Please review the individual program descriptions in the Action Plan for further details.

“Foundation for Puerto Rico

1. *What is going to be the role of Foundation for Puerto Rico in the strategic planning process of the communities of the CDBG-DR funds?”*

PRDOH Response: Please review the Action Plan program description regarding this program.

2. *“How is Foundation for Puerto Rico able to fulfill the purposes of the program? What is the expertise? What will be the community participation in these?”*

PRDOH Response: Please review the Action Plan program description regarding this program and the role of the Foundation. Yes, participatory community planning is a cornerstone of The Whole Community Resilience Planning program.

3. *“Why Foundation for Puerto Rico was elected when Community Coalition has experience developing strategic plans for their communities?”*

PRDOH Response: Thank you for your comment. The Foundation for Puerto Rico is not responsible for developing strategic plans, these plans will be developed by the communities themselves. The Foundation for Puerto Rico is serving as the program implementation partner to manage the program and will coordinate resources to support communities as needed in plan development. Further details will be provided in program guidelines to be published on the website.

4. *“What’s the expertise of Foundation for Puerto Rico to obtain the Community Planning disbursement?”*

PRDOH Response: The Foundation for Puerto Rico is not the recipient of the funding. Please see the above response for their role in this program.

“Immigration/ Emigration

1. *It seems that one of the stated goals of the plan is to reduce immigration. Is it one of the goals of the plan to bring back people who left Puerto Rico?”*

PRDOH Response: Thank you for your comment. Yes, it is a goal of CDBG-DR programs to enable the return of the greater Puerto Rican community who have left following the hurricanes. There is a broad range of programs within housing and economic development sectors to this end.

2. *“What about existing housing stock and population loss?”*

PRDOH Response: The comment or question is unclear, but data relative to housing and population is outlined in the Action Plan.

3. *“CDBG-DR funds are directly for the island; how do you plan on assisting those who have migrated to the mainland?”*

PRDOH Response: Thank you for your comment, this is an important consideration which PRDOH has taken into account. The CDBG-DR programs have different eligibility requirements, and so for example some programs are focused on addressing damaged housing for those who lived on the Island at the time of the disaster, while others can serve to incentivize the return of those who have migrated to the mainland. Please review the programs for more details.

“Construction and Vacant Homes

1. *According to the Action Plan, "As identified by the Puerto Rican Planning Society using data from the US Census, there are 92,629 vacant housing units only in the municipalities of San Juan, Bayamón, Carolina, Ponce and Mayagüez." In terms of strategy, why don't you use the existing infrastructures for housing instead of developing more housing units?"*

PRDOH Response: Thank you for your comment. PRDOH has considered your input in the Action Plan. Programs will seek out opportunities for in-fill and blight reduction and to capitalize on vacancy occurrences. However, it is important to recognize that all vacancy opportunities must be evaluated for code issues, sufficiency of construction materials, location in hazard areas, etc. Thus, many vacant units are substandard, and not all units listed as vacant are not suitable for being occupied.

2. *"With all the vacant housing in PR, how do you see a space for new housing?"*

PRDOH Response: Thank you for your comment. Please see the previous response.

3. *"Do you build new housing units or do you renovate the existing ones?"*

PRDOH Response: Both options will be available. Please review the housing programs.

4. *"If there are so many vacant houses, why don't you rehabilitate them instead of building new units?"*

PRDOH Response: Please see previous response in #1.

5. *"LEED certification is very expensive. If affordability is a goal, would you recommend building to LEED or some other green standards and not getting the actual certification?"*

PRDOH Response: Thank you for your comment. PRDOH has taken this into consideration in the development of programs.

6. *"How large are the construction square feet?"*

PRDOH Response: It depends on the program – please see program guidelines when they are published on the website.

7. *"How can community organizations manage construction risks?"*

PRDOH Response: The question is unclear as to what is meant by community organizations, however program managers will manage construction risks for the housing program.

8. *"Which housing developers are located in Ceiba and Naguabo?"*

PRDOH Response: PRDOH does not have information on housing developers in these communities at this time with regard to the Action Plan. We suggest contacting these communities directly.

"Vulnerable populations

1. *Excellent statement: PRDOH has chosen to give priority to elderly applicants in several housing recovery programs. This is clear policy and will help produce safe shelter for these people. The DRAP needs more statements like this."*

PRDOH Response: Thank you for your comment.

2. *“What are the communities identified as vulnerable? Do you already have maps published by blocks, census tract or community area that demonstrate the social vulnerability index (SOVI®)?”*

PRDOH Response: The SOVI maps are included in the unmet needs analysis, as is data around these communities. Please refer to the Action Plan.

3. *“In the SOVI table, the black population is too low. Black and not African American is the term used in the census, this percent should be higher. The percentage of Hispanics might be not applicable in Puerto Rico, as this absence doesn’t represent more vulnerability in comparison to our own geography.”*

PRDOH Response: Thank you for your input.

4. *“In the shelter section, 14.97% of head of households were African American or Black? Check the terminology collected by the CoC.”*

PRDOH Response: Thank you for your input.

5. *“According to the plan “It has been estimated that anywhere from 45% to 55% of Puerto Rican households have either erected or maintained houses through informal construction, a self-managed method of construction completed without the use of an architect or engineer, proper permits, and often in non-conformance with land-use codes.” Funds have been assigned to give titles to people, but a process is missing from the document.”*

PRDOH Response: To clarify, funding has been identified for the Title Clearance program to support resolving the issues mentioned, but it does not give titles. Please refer to program guidelines for this program when they are published on the website for additional information.

6. *“If HUD prohibits forced expropriation, what is the government's strategy to avoid reconstruction in unsuitable places such as flood zones, landslides, maritime terrestrial zones?”*

PRDOH Response: Thank you for your comment. PRDOH recognizes these challenges and they are addressed in the program's guidelines. Please refer to the program on the website when they are published for further details.

7. *“How can community groups mediate with displaced communities? Will they hear things straight from the communities?”*

PRDOH Response: The comment is unclear with respect to any program or initiative, but there will be participatory community planning efforts, which are described in the Action Plan, and will provide an opportunity for stakeholder conversations.

8. *“If the informal housing was affected by hurricane Maria, what needs to be done in order to improve the housing situation of homeless individuals?”*

PRDOH Response: Thank you for your comment. Informal housing is different than homelessness, but PRDOH understands concerns around both situations. Please review the

housing programs section and planning programs section for further information on both of these.

9. *“There is a need for specialized homeless housing for LGBTQAI individuals, in particular for youth and older adults. The plan doesn’t mention this population.”*

PRDOH Response: Thank you for your comment. All CDBG-DR programs are non-discriminatory and program implementation will be conducted in a manner which will not cause discrimination on the basis of race, color, religion, sex, disability, familial status, or national origin.

10. *“The Action Plan does not include services for people with intellectual disabilities, especially support services in HUD programs including the 811 program. How can that need be inserted into the plan to increase housing services?”*

PRDOH Response: Thank you for your comment. All CDBG-DR programs are non-discriminatory and program implementation will be conducted in a manner which will not cause discrimination on the basis of race, color, religion, sex, disability, familial status, or national origin.

11. *“In terms of accessing housing, how are low-income people defined for qualification? What happens with people who do not earn enough for the prequalification of purchase, but earn too much to qualify for citizen aid?”*

PRDOH Response: Please refer to the Home Repair, Reconstruction, or Relocation Program in the Action Plan, which describes eligibility for the single family housing program. Further information will be available in the program guidelines, which will be published on the website.

“Poverty and Inequality

1. *Some attempt at establishing targets for narrowing the housing-income gap is needed. The Plan states that the median income is \$19,606, and the median home value is \$118,600. This is a 6 times housing/income gap. For economic policy considerations, the gap needs to be reduced as the salary potential of the main employment sectors rises slowly. Also, with all the investment in new and rehabilitated housing proposed, that gap might even enlarge under the DRAP.”*

PRDOH Response: Thank you for your comment. PRDOH considered this dynamic in the diversity of programs across housing and economic sectors, which includes homebuyer assistance, workforce development, housing counseling, among other related programs.

2. *“How can the CDBG-DR funds be used to reduce poverty in PR? Are there any incentives to build poverty reduction targets in the recovery process?”*

PRDOH Response: Thank you for your comment. HUD requires 70% of all CDBG-DR funds in this Action Plan to benefit LMI populations, and PRDOH recognizes the importance of this and also has developed a robust economic development portfolio.

3. *“The plan talks about poverty in Puerto Rico. Is it one of the objectives of the plan to reduce the social inequality that exists in Puerto Rico?”*

PRDOH Response: Please see the above response. PRDOH is committed to reducing poverty and social inequality.

“Accessing Funds

1. *Would you have technical assistance to obtain CDBG-DR funds?”*

PRDOH Response: Information about how to apply for funding and technical assistance support will be published in applicable program guidelines when available on the program website.

2. *“What are the requirements the Housing Department needs to accomplish in order to access the funds as presented?”*

PRDOH Response: The comment/question is unclear, but if it is in regard to HUD’s requirements, please refer to the August 20th Federal Register Notice, the link to which can be found on the program website.

3. *“How do you choose where to begin, which communities receive funding and resources and is maintenance being addressed in your plans?”*

PRDOH Response: Please review the unmet needs assessment to understand priorities and methods of distribution. It is unclear what is meant by maintenance. Please review program guidelines as they are published for program specific inquiries.

4. *“What type of projects or opportunities are there for investors? Can you give examples?”*

PRDOH Response: The CDBG-DR program is not an investment vehicle, but please review the economic recovery programs if you are interested in understanding how CDBG-DR funds can be used to support recovering businesses.

5. *“Is financing available for financing companies?”*

PRDOH Response: The comment is unclear, but please see the above response.

6. *“How do you operate with other non-profits, partners without competing for funds?”*

PRDOH Response: PRDOH is not competing for funding. PRDOH is the grantee from HUD.

7. *“Do you accept proposals?”*

PRDOH Response: Program guidelines will identify opportunities for application and submission of proposals.

8. *“How are you going to help marginalized communities that are not organized towards social entrepreneurship?”*

PRDOH Response: Thank you for your comment. Please review the economic, housing, planning, and infrastructure recovery programs in the Action Plan. There are multiple avenues available for communities.

9. *“Are there opportunities for non-profit organizations to venture as sub recipient of CDBG-DR funds into agricultural projects?”*

PRDOH Response: Please review the Action Plan program Re-Grow PR, which provides initial information on eligible entities. Program guidelines for Re-Grow PR will provide further detail on funding eligibility, and these will be published when available on the program website.

10. *“The challenges for community leaders continue, they do not have the mechanism (501 c3) to be able to become subrecipients of CDBG-DR funds. How do you really achieve autonomy in vulnerable communities?”*

PRDOH Response: The comment is unclear in terms of what program or initiative is being referenced. Program guidelines will provide additional eligibility information.

11. *“How do you choose the non-profits that can apply for CDBG-DR funds?”*

PRDOH Response: Program guidelines will provide additional information on application and selection processes, and these will be published on the website.

12. *“How can cooperatives access CDBG-DR funds?”*

PRDOH Response: Program guidelines will provide additional information on application and selection processes, and these will be published on the website.

13. *“Can the board members of a cooperative be certified as CBD’s or as organizations that can receive CDBG-DR funds?”*

PRDOH Response: Program guidelines will provide additional information on application and selection processes, and these will be published on the website.

14. *“What opportunities can a non-profit organization that is developing an agritourism project find?”*

PRDOH Response: Please review the Action Plan program Re-Grow PR, which provides initial information on eligible entities, and also consider the economic recovery programs around small business financing and tourism and marketing. Program guidelines will provide additional information on application and selection processes, and these will be published on the website.

15. *“What is going to be the protocol to access funds destined to community agriculture development and where can we access them?”*

PRDOH Response: please see the above response.

“Local firms and NGOs

1. *Recently, the CNE reported that, of the first 5 billion invested in reconstruction, 4.5 were invested into foreign companies. The Governor proposed increasing the labor wages, but is not enough. How can we push for this to happen from the civil society (or through the Action Plan)?”*

PRDOH Response: Thank you for your comment. PRDOH has not funded any projects or programs yet. The CDBG-DR economic recovery programs outline hundreds of millions of dollars in funding opportunities for businesses as well as workforce development. Further, PRDOH fully supports the Section 3 program for all of its programs wherein contractors will be procured. As mandated by HUD, PRDOH must follow HUD-approved procurement processes which encourage fair and open competition and comply with 2 CFR 200. Information regarding contracts procured by PRDOH related to its CDBG-DR grant, including contract value, start and end dates, summary of scope, and complete copies of executed contracts, is available publicly at <http://www.cdbg-dr.pr.gov/contratos/>.

2. *“What measures is the Housing Department taking to ensure the hiring/engagement of local companies for the reconstruction?”*

PRDOH Response: Thank for your comment. Please see the above response.

“Transparency

1. *Being the authorized entity by HUD in Puerto Rico to grant CDBD-DR funds: What transparency methods are going to be elaborated to track disbursements to entities that are acceptable?”*

PRDOH Response: PRDOH is committed to leading a responsible and transparent recovery effort. As required by 83 FR 5844, PRDOH must post information related to its CDBG-DR Grant to its website for public consumption. Information including procurement policies, contracts, Quarterly Performance Reports (QPR), expenditures, program policies and procedures, and other related information will be posted to PRDOH ’s disaster recovery website at www.cdbg-dr.pr.gov as it becomes available.

2. *“Are you going to have a transparent system with information about how the CDBG-DR funds are being distributed?”*

PRDOH Response: PRDOH is committed to leading a responsible and transparent recovery effort. As required by 83 FR 5844, PRDOH must post information related to its CDBG-DR Grant to its website for public consumption. Information including procurement policies, contracts, Quarterly Performance Reports (QPR), expenditures, program policies and procedures, and other related information will be posted to PRDOH ’s disaster recovery website at www.cdbg-dr.pr.gov as it becomes available.

3. *“Are you going to establish a follow-up mechanism for the funds granted by HUD?”*

PRDOH Response: PRDOH is committed to leading a responsible and transparent recovery effort. As required by 83 FR 5844, PRDOH must post information related to its CDBG-DR Grant to its website for public consumption. Information including procurement policies, contracts, Quarterly Performance Reports (QPR), expenditures, program policies and procedures, and other related information will be posted to PRDOH ’s disaster recovery website at www.cdbg-dr.pr.gov as it becomes available.

4. *“This is more of a question for the Puerto Rico Housing Department, not related to the action plan. Funds Transparency? Why are Housing Inspectors obliging Your Home Reborn participants to sign tablets and not giving them a copy of their household expenses.”*

PRDOH Response: Please direct your question to the program in question.

5. *“Are there mechanisms for citizens to ensure the contracts are granted in a transparent manner?”*

PRDOH Response: PRDOH is committed to leading a responsible and transparent recovery effort. As required by 83 FR 5844, PRDOH must post information related to its CDBG-DR Grant to its website for public consumption. Information including procurement policies, contracts, Quarterly Performance Reports (QPR), expenditures, program policies and procedures, and other related information will be posted to PRDOH’s disaster recovery website at www.cdbg-dr.pr.gov as it becomes available.

“Matching Funds

1. *Are there potential partnership with cooperative banking in US/ New York?”*

PRDOH Response: The CDBG-DR program is not an investment vehicle. PRDOH suggests reaching out to DDEC or BDE for these types of inquiries.

2. *“How can the EDA funds be combined with the CDBG-DR funds?”*

PRDOH Response: Thank you for your comment. PRDOH seeks opportunities to leverage CDBG-DR funds with other federal funding streams to maximize recovery impacts. Please review the economic recovery programs for more information.

3. *“How can USDA, EDA, SBA support the training of professionals at the University of Puerto Rico, which is the largest one?”*

PRDOH Response: PRDOH is the grantee from HUD. The other agencies referenced would be better points of contact for coordination with the University of Puerto Rico.

4. *“Can we combine the New Market Tax Credits or Opportunity Zone funds?”*

PRDOH Response: PRDOH will leverage funds whenever feasible and compliant with HUD regulations to maximize recovery potentials.

5. *“Do risk management institutions in Puerto Rico have the capacity to embark on the recovery process? The organizations that file for aid programs and do not have a 25% matching will have an extension of time to carry out the requested percentage?”*

PRDOH Response: It is unclear what is meant by risk management institutions. Regarding a 25% match, CDBG-DR funding does not require this, but can be used to support non-federal local match requirements such as FEMA (HM, PA) programs, which is discussed in the Action Plan.

6. *“How are Opportunity Zones aligned with zoning use priorities and plans?”*

PRDOH Response: Please refer to program descriptions in the Action Plan and program guidelines as they are published on the website for more information on plan alignment.

“Mitigation

1. *Can we access the mitigation funds to develop a transportation company with social functions?”*

PRDOH Response: Thank you for your comment. While CDBG-DR mitigation-specific funding regulations will be outlined in a future register notice, PRDOH recommends evaluating the economic recovery programs for potential funding opportunities around small business financing.

2. *“The organizations who apply for rehabilitation funds need to be accompanied by mitigation funds?”*

PRDOH Response: CDBG-DR funds are separate from FEMA HMGP funds, but they can be used together, although there is no requirement. CDBG-DR programs do seek to incorporate mitigation and resilience measures whenever possible.

3. *“Given the economic condition and employment profile in PR the allocation of over 40% of CDBG-DR funds to housing is too large. Change the mix and raise the economic development sector investments, or the exodus will continue, and while housing status will improve, the economic status will decline.”*

PRDOH Response: Thank you for your comment. In the Federal Register Notices which govern the expenditure of CDBG-DR funds, housing is the mandated priority. Please review the unmet needs analysis to understand the housing needs in Puerto Rico.

“Environment

1. *Is recycling important or is it not in the Action Plan?”*

PRDOH Response: Thank you for your input. PRDOH has identified the opportunity for Re-Greening and waste-repurposing associated with clearance and demolition activities under the City Revitalization program.

2. *“Any grants or programs for environmental control?”*

PRDOH Response: All programs under the CDBG-DR portfolio are subject to local and federal environmental reviews and standards. As such, all projects funded by CDBG-DR must comply with applicable local and federal environmental regulations.

3. *“How will the determinations of the vulnerable zones are going to be made for the displacement or voluntary relocation process? The plan mentions “alluvial plain” what does this mean?”*

PRDOH Response: All relocations are voluntary, and PRDOH will not displace anyone. Reconstruction in the floodplain is not an eligible activity. The floodplain is the special flood Hazard area as defined by FEMA. Please visit <https://www.fema.gov/flood-zones>.

4. *“How are the ecological subjects being considered in the mitigation plans? How is the cultural influence being incorporated into the mitigation plans?”*

PRDOH Response: Thank you for your comment. The CDBG-DR Action Plan is not a mitigation plan, but it does incorporate mitigation and resilience whenever possible, including providing opportunities for small business financing and incubators and accelerators, which could include artists or members of the cultural economy. Further, the tourism and marketing programs may provide additional avenues related to your inquiry. The ecology of the island is considered in all CDBG-DR funded projects, which must comply with applicable local and federal environmental regulations. Re-Grow PR and City Revitalization programs also may be of interest to your inquiry.

5. *“Can renewable energy systems qualify for this funding?”*

PRDOH Response: Please review the Home Energy and Water Resilience Installations program. Other programs may also be of interest, such as Community Resilience Centers.

6. *“Does the Science Trust have any programs that address the solid waste and landfill problems in PR?”*

PRDOH Response: Please direct your inquiry to the Science Trust.

7. *“Solar panels and other key items related to energy efficiency can assist families, especially those who are low to moderate income. These should be offered and paid with CDBG-DR funds.”*

PRDOH Response: Please review the Home Energy and Water Resilience Installations program.

“Economic Development

1. *What programs do you have for the creation and development of Business Incubators? When do they open the call to request funds?”*

PRDOH Response: Please review the Action Plan economic recovery program entitled Small Business Incubators and Accelerators. Program guidelines will be published on the website when available.

2. *“What areas have priority in entrepreneurship?”*

PRDOH Response: Please see the above response.

3. *“What’s your opinion of the economic development opportunities in the waste sector?”*

PRDOH Response: Puerto Rico is an island, and there are always opportunities for innovation, in particular where something can be repurposed and not imported. Please review the economic recovery programs for potential avenues of interest that align with your inquiry.

4. *“Is the need assessment for economic development public?”*

PRDOH Response: The unmet needs analysis is included in the Action Plan, which includes economic recovery needs.



5. *“Where is this Destination Plan for recovery? Is it public? How does a small business add to your company’s mission and vision? Where do we access initiatives through collaborative effort?”*

PRDOH Response: This document is in reference to the PRDOH CDBG-DR Action Plan, and there are opportunities for small businesses outlined in the economic recovery programs section.

6. *“What are the short-term and long-term outlook for high speed internet access?”*

PRDOH Response: PRDOH is not the relevant entity for this inquiry.

7. *“The unemployment statistics cited are misleading. According to BLS, before Hurricane Maria, unemployment in Puerto Rico was 10.4%. In August, 2017 that number had jumped to 10.9% by January 2018, and after that, it has declined to 8.8 (Aug 2018).”*

PRDOH Response: Thank you for your comment. Typically, following a disaster, unemployment rates increase as businesses are not functioning. However, as recovery efforts get underway, more job opportunities associated with recovery become available, reducing the number of unemployed persons. Further, there has been significant outmigration post-disaster, and so the number of persons reporting may have also decreased.

“Community participation

1. *Can you provide a directory with the contact information of employees from the municipalities and Housing Department who are in charge of the consolidated plans for the CDBG, ESG and HOME programs? Could HUD create a module about citizen participation in the Consolidated Plan and its amendments?”*

PRDOH Response: Please direct your inquiry regarding HUD modules to the local HUD field office. https://www.hud.gov/states/puerto_rico_virgin_islands/offices#sanjuan | San Juan Field Office | US Department of Housing and Urban Development | San Juan Field Office | 235 Federico Costa Street, Suite 200 | San Juan, Puerto Rico 00918 | Phone: (787) 274-5846

2. *“How can we get in contact with the Housing Department? Is there a specific process?”*

PRDOH Response: The inquiry you have submitted is directly received by PRDOH /Vivienda. infoCDBG@vivienda.pr.gov

3. *“Does the Housing Department consider real and effective participation through public hearings in the comment process?”*

PRDOH Response: PRDOH holds the community engagement process in high regard, including public hearings, comments received by email, handwritten, etc. and understands the value of community engagement in delivering services to the people of Puerto Rico.

4. *“What was the input of the communities in the creation of the programs, especially considering that the programs were presented in the plan prior to the public hearings and communication spaces?”*

PRDOH Response: The public comment draft and associate comment period is the time in which all feedback gathered up to the point of publication of the public comment draft is presented. PRDOH has continued to engage communities throughout the process, from the beginning, and not just during the public comment period. The public comment period is representative of the time in which all feedback gathered to date has been incorporated and shared with the full public, at which point additional feedback is sought.

5. *“What is going to happen with the communities that are just getting started in terms of social entrepreneurship that can’t access the internet?”*

PRDOH Response: PRDOH understands that not all Puerto Ricans use the internet, and will make available information through traditional mechanisms as well as upon request, such as hard copies of program information, direct mailers, fliers, etc.

6. *“Why is the community not involved in the planning process of their community?”*

PRDOH Response: PRDOH values the input of all community members, and the public comment period seeks this input, and all community members are encouraged to attend public meetings. For further information about incorporating community input into planning efforts, please review the Whole Community Resilience Planning program.

7. *“The mayors and legislature are not the community, are you aware of that?”*

PRDOH Response: Yes, thank you for your comment. PRDOH has engaged and continues to engage a wide variety of stakeholders from communities.

8. *“How did you make local alliances with urban community decision-making organizations?”*

PRDOH Response: PRDOH values the input of all stakeholders.

9. *“What is the process to participate or get involved in in the organizations’ projects? Does it need to be as an individual, a group or an organization?”*

PRDOH Response: PRDOH will provide application information for all programs in program guidelines, which will be made available on the website as they become available.

Comment: #302_10-21-18_Yandaily Matos Cruz

“To develop a traditional and new cakes company. An example of this is breadfruit dough, among others. With different fillings, such as cod. The idea is based on developing three in one at a short term. A traditional restaurant, retail and a factory to distribute to local stores. This includes grocery stores, supermarkets and locating stalls at different times of the year, whether during festivals and/or at malls, directly affecting the agriculture in our country, using completely fresh products that come straight from our farms. This creates over 25 direct jobs and more accessibility for our clients, promoting the economic development in several areas. At a long term, this would turn into exportation to different countries. I would also like for our company to be involved in charity work for different institutions. This is a personal, professional and commercial

entrepreneurship project that helps promote the existence of traditional products, both for those who have left Puerto Rico, as for future generations.”

PRDOH Response: The Small Business Financing program provides grants and loans for eligible small businesses. Please review the Action Plan for information regarding this program.

Comment: #303_10-21-18_Rachel Hiskes

“ ~ PLANNING AREA ~

Incorporating the experience of the residents and businesses into the recovery of their local environments and knowledge is of vital importance. That planning must be performed by the communities, and especially for those special communities of which many have PDIs, Integral Development Plans. It is necessary to recruit community planners and organizers who come from the same base communities and organizations. Some noteworthy examples are the Trust for the Development of Rio Piedras and the Caño Martín Pena Community Land Trust.

It is also important to plan for any effects produced by climate change. You can already see the erosion in costs, the sea level and temperatures are rising and the storms and rain are intensifying. Puerto Rico must carry out a process to plan at a large scale in the Planning Board with input from all sectors, whether they are municipalities or non-profit organizations.

~ FLOOD CONTROL: INFRASTRUCTURE/PUERTO RICO DESIGNS ~

None of the CDBG-DR funds must be used for major land alterations such as the grooves or dams that USACE is budgeting for Puerto Rico. These measures are being questioned lately, and recent science shows that they only move water downstream. They don't mitigate major causes.

In change, green infrastructure such as natural barriers like oysters, mangroves, dunes and reefs in the coast have a high success rate. As for communities with rivers, introducing stones, wood, stabilization of banks, and retention ponds are measures with noteworthy success.

Below are some necessary investments for Rio Piedras and around the island:

- The non-existent rain water and sewer systems cause floods in many places. The contracts must demand a 75% of local workers, and it should be the same for management levels.*
- The sanitary water systems and broken pipes around the island cause the appearance of water with fecal matter, which is a public health problem.*
- The construction of roads must follow the guidelines of Full Roads. It must also validate the DTOP regulations for the construction of roads that have bicycle lanes, wide sidewalks, shades/trees, benches/trash cans, and spaces for pedestrians. Roads for everyone: pedestrians, elderly, children, drivers, etc.*

~ HOUSING ~

There are lots of proposals for new constructions but there is an excess of vacant properties.

Property Titles: plots handed over by the land authority since the 50s, but there is no documentation. Many people who own plots were denied assistance from FEMA because they have no documentation from the Land Authority.

These funds must be used for the permanence of communities. ODSEC must be used to establish the necessary regulation for Special Communities to hold their assemblies, retain their population, address their needs and, if relocating a community is an option decided voluntarily by the community, and then the CDBG funds must be used for the buyout.

Likewise, proving the possession and right to a property must include many elements and must prioritize stable communities with houses that are inhabited by owners and a stable population. This program must provide the option to give an opportunity for collective possession under Trusts or Cooperatives. Also, the implementation of this program must include neighborhood committees, leaders of advocacy organizations such as Hurricane Maria Legal Assistance, PR for the Right to Adequate Housing and a Coalition of Coalitions.

~ AGRICULTURAL RE-GROW ~

This program must fill voids for small farmers / those who do not qualify under USDA, who don't have the costly insurance that is a requirement for agricultural federal assistance. Also, it must consider residential farms and the gap in rentals that don't allow housing.

~ IMPLEMENTATION ~

The CDBG-DR funds comprise a sector of economy that most dominate a labor force that is not liked to a particular administration, but rather that is rather experienced in governance, disasters and residency in Puerto Rico. These are public funds and must not go through a lot of contractors or experts that don't live and don't pay taxes in Puerto Rico. It is necessary to establish the expertise in housing administration that the excellent professionals in PR have, and to attract the professionals that have had to emigrate to get back.

Surely, the Housing Department, in its administration funds, must contemplate and expand its workforce and the other units they implement, such as ODSEC, which is almost non-existent, and it's little help for the communities in their rewarding decision-making process.

I think that the RFP hiring that is currently used by the Housing Department would only be realistic for its current Home contractor, and it's necessary to have public employees with an expertise in Puerto Rico."

PRDOH Response: Thank you for your comments regarding planning, flood control, housing, agriculture, and implementation and the importance of local expertise. PRDOH agrees that planning works best when it is community driven and involves municipalities and the Planning Board and has designed programs such as the Whole Community Resilience Planning with those considerations in mind.

Regarding infrastructure, CDBG-DR cannot be used to fund activities that would otherwise be funded by the US Army Corps of Engineers. PRDOH appreciates your recommendations regarding the Title Clearance Program and the Re-Grow Puerto Rico program and will take them into consideration during further development of the programs. PRDOH also thanks

you for your comments regarding workforce opportunities for qualified Puerto Ricans and looks forward to providing meaningful employment opportunities to those professionals.

The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

PRDOH will use traditional and non-traditional methods for verifying ownership. Additionally, the Title Clearance program provides assistance to homeowners to obtain clear property title.

Comment: #304_10-21-18_Eis Esquilín

“I come from the town of Loiza, Minimine sector. My comment is regarding the risk mitigation plan for the area. This area is one of the first to flood and it's necessary for the plan to include a rain system with pumping that helps discharge water into the sea, a renewed sewer system for the entire sector, prohibition of construction in the areas with the biggest flooding. Those who are residents already will be the most affected, and that includes my home because one of the municipality's plans is to construct in an area where there is a pipe and the land is soft. Also, they are doing it where the terrain is the lowest and that's where the water goes. Refilling it or constructing there could damage the structures around it. It is necessary to investigate because in the municipality there are more than 80 uninhabited houses, which are becoming a public obstacle and could be renewed and distributed to those who need homes. That would improve planning and constitute less expenses. That money could be used to satisfy many other needs. Many older residents that have little to no income could be helped so that they can reconstruct and/or improve their structures, including solar panels for all residents because the electrical system is often interrupted for hours, and that causes damages in belongings, loss of food and even loss of medication that is kept refrigerated”.

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

The Community Energy and Water Resilience Installations program aims to provide sustainable, renewable energy to residences and small businesses.

Comment: #305_10-21-18_Mariana López

“My comments are aimed at the economic impact and the ownership of housing. The economic impact in the employees after the Irma and Maria hurricanes has had a determining socioeconomic impact where thousands of Puerto Ricans had to leave the country. There was a drastic change in the economy because unemployment affected tourist spots, agricultural services

and public services. When this subject is mentioned in the Action Plan, one looks for answers on how the investments will be done to produce high quality jobs. There is ambiguity in that part because it mentions the most affected sectors but doesn't mention the effect on this area by the CDBG funds. The impact on housing is another of the most meaningful subjects due to the events related to the hurricanes in 2017. Regarding the subject of property titles, the Action Plan mentions the country is in big need of ownership of property, but it doesn't mention any possible solutions, so it is ambiguous on a real solution for the problem. What position will the government take (with the assigned funds) regarding people with high vulnerability to atmospheric events, since the lack of ownership makes them more vulnerable and unstable? It is clear that these people may be aware that they live in informal settlements, but since that is their only housing option, they must be offered or they must be provided with a way to protect it”.

PRDOH Response: The Small Business Financing program provides loans and grants to eligible small businesses and microenterprises.

Comment: #306_10-21-18_Carmen G. Cosme Pitre

“Work makes psychological development and the personal growth of the individual possible, and gives him responsibility, possibility of success, progress, promotion and quality of life for communities.

This intervention project is based on the preparation and design of Socio-Labor Insertion aimed at assisting areas with a higher number of correctional institutions in PR. A group of people who had problems with the justice and who are between 18 to 65 years old was selected in this area. The initiative's purpose is to train the participants with techniques and skill development to strengthen personal autonomy levels and the interest to enter into the working market in Puerto Rico. The need of human resources who are experienced in construction areas after the impact of Hurricane Maria is obvious. The project promotes the insertion of experienced individuals who are ready to face the new challenges faced by Puerto Rico, and promotes a reduction of people without goals who are prone to wander and prone to criminal activities that affect the coexistence in our cities, communities and neighborhoods. The project is based on a theoretical framework that integrates the following execution strategies:

- a) Training and exposure to theories, concepts and techniques related to several construction disciplines.*
- b) Appraisal and process to efficiently diagnose didactic processes.*
- c) Execution of techniques with qualitative and quantitative evaluation metrics.*
- d) Practice and execution of works.*
- e) Appraisal of execution processes.*

The project aims to show and raise awareness on the current situation of the prison system regarding work, showing what are their needs and the obstacles they face when they try to go back to work after leaving prison, which is related to a better social integration and safety in communities, neighborhoods and municipalities.

Keywords: Prison, Socio-Labor Insertion, Accompaniment, Competences, Housing Construction and Rehabilitation, Insertion Itinerary, Improvement of Quality of Life, Community, Neighborhoods and Municipalities.

We intend to work with the municipalities in the south area, which are currently suffering from limitations in work development, housing and economy. It is intended to develop light construction initiatives that quickly and effectively affect the communities or areas to be selected in a collaborative effort with the participating municipalities. For that, we have three development phases or stages.

The first stage qualifies the participants of the correctional system who will be an integral part of the workforce that will be in charge of improvement projects. This way, we can promote the integration of employees who will serve as elements of change and transformation in the areas to be intervened. The second stage involves beginning to work with the families who are located in vulnerable and high-risk places, who understand why they need to move to healthy and safe places, all through our case handlers. In the meantime, the municipalities are identifying empty plots, existing properties, unfinished projects, public nuisances, schools, among others. This is what immediately started the work, transformation and prosperity of our communities, neighborhoods and municipalities. And, as a third stage, projects with a larger magnitude should be used so that we can establish the following at the end of the reconstruction of communities, neighborhoods, municipalities and PR:

- *Direct and indirect permanent job sources*
- *Community development*
- *Healthy housing*
- *Safe communities*
- *And an economic stability for the municipalities that will be affected by the funds.*

We have been working on this project for twenty years in different municipalities”.

PRDOH Response: Thank you for your comment. The Workforce Training program will help unemployed and underemployed residents find employment by providing job training. Persons who have had problems with the justice system are encouraged to participate. PRDOH will take these comments into consideration during further development of the Workforce Training program.

Comment: #307_10-21-18_Rafael Torres

“On page 38, which describes the population with special needs, it is important to include intellectual disabilities and deficiencies in development. It is mentioned later, but it is important to specify it in the definition. Likewise, I would like to identify the need of a “long-term care facility” for the population with special needs who must live at a resilient housing with specialized medical assistance. Currently, this type of specialized housing is not accessible for this population”.

PRDOH Response: Thank you for your comment. PRDOH has taken this into consideration.

Comment: #308_10-21-18_Marta Elsa Fernandez

“Even though there is a limited time, considering the long document submitted for consideration of the country, I think it is important and necessary to bring attention to the needs of a part of the population that this Action Plan must take into special consideration: women who live in extreme poverty. There is a strong relationship between the vulnerabilities that cause these natural phenomena and gender. In my community, like in many communities in our country, women assumed leadership in many of the first tasks that were developed: preparing food for community centers, census to locate people who were sick, alone or in bed; visits to homes, taking care of children; and, not to forget surveillance in the streets and directing traffic to help the brigades do their jobs. Many of them lost their jobs or saw a significant reduction in their income. Others had to face domestic and family violence given the emotional crises that they faced in many cases.

The Action Plan contemplates, among its areas of opportunity, actions to promote economic development, education and social services. From a gender perspective, it is urgent for the actions to be developed in these areas to take into consideration: 1) employment and self-employment opportunities for women, 2) creation of daycare centers, 3) centers to offer service and care for elderly people, 4) community dining halls. Anyway, there are many other elements that could facilitate the incorporation of women into income-producing activities that help reduce poverty and social and economic inequality.

The only thing that will help us achieve a fairer, more resilient and equitable Puerto Rico is to make an investment in our own resources so that they remain in the country.”

PRDOH Response: Thank you for your comments. All CDBG-DR programs are non-discriminatory and program implementation will be conducted in a manner which will not cause discrimination on the basis of race, color, religion, sex, disability, familial status, or national origin.

Comment: #309_10-21-18_Roberto Torres

“The CDBG-DR funds are destined to long-term reconstruction and recovery. As emphasized by the Action Plan, these funds must be used for housing, infrastructure and the economic recovery of the country. I will base my comments on the needs of my town, Villalba:

- *Housing: According to the presentation offered by Villalba's mayor, Luis Javier Hernandez, there is a possibility to relocate families in other developments proposed in the urban area of the municipality. Among the criteria that were defined for “relocation” are: people who live in distant communities and who don't have the infrastructure of basic services; families who live in areas that are prone to floods or collapses; people who have completely lost their houses or who have suffered severe damages to their infrastructure. It is important to mention the number of empty/abandoned houses that can be used. The plan must be more specific regarding how the funds must be used for current houses and*

structures, without incurring into additional expenses for new constructions, leaving empty spaces without any use.

- *Infrastructure: The town of Villalba suffered catastrophic damage in its bridges, roads and framing roads, mainly due to runoff and urban flooding from the Jacaguas river. There are examples on how canalized rivers in urban areas in the island are the main cause for community floods and damage to infrastructure. The plan is not clear on how these funds for “critical infrastructure” may be used, whether to find long-term mitigation alternatives or to incentivize the investigation of green infrastructure methods”.*

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

The Critical Infrastructure Resilience program will fund the rebuilding, hardening, improving of critical infrastructure. Further details regarding the program will be published as part of program guidelines, after the program is approved by HUD.

Comment: #310_10-21-18_Emlly puthoff

“I encourage you to incorporate as many sustainable strategies as humanly possible into the plan. We need to drawdown our carbon emissions, and every new plan is an opportunity to design for our future. You can do it! Look to project drawdown for more ideas.”

PRDOH Response: Thank you for your comment. The Community Energy and Water Resilience Installations program aims to provide sustainable, renewable energy to residences and small businesses.

Comment: #311_10-21-18_Emlly Puthof

“I encourage the plan to include every opportunity in the design to drawdown carbon emissions and to incorporate sustainable, resilient infrastructure and housing decisions.”

PRDOH Response: Thank you for your comment. The Community Energy and Water Resilience Installations program aims to provide sustainable, renewable energy to residences and small businesses.

Comment: #312_10-21-18_Maria E. Rivera Irizarry

“I'm interested in the incentive for homeowners or to buy a new property. I'm a teacher and my husband is one too. Could you send me some information?”

PRDOH Response: The Homebuyer Assistance program offers down payment and closing cost assistance for the purchase of a new home.

Comment: #313_10-21-18_Annette Vega

“How can we request the benefit? Do we do it directly with the Housing Department? Online? On what dates? Thank you!”

PRDOH Response: Information regarding how to apply for programs outlined in the Action Plan will be published at www.cdbg-dr.pr.gov, as part of program guidelines, when available.

Comment: #314_10-21-18_Maria Serrano

“Good afternoon, To whom it may concern: I would like to know what I need to do for the law made for public employees to receive \$25,000 for housing and what documents I need to take and what forms I need to fill out.”

PRDOH Response: The Homebuyer Assistance program offers down payment and closing cost assistance for the purchase of a new home. Information regarding documents required will be published at www.cdbg-dr.pr.gov, as part of program guidelines, when available.

Comment: #315_10-21-18_Lysa Braham

“My idea is to include help for main residences whose roofs were damaged due to filtrations in almost the entire structure, and which the hazard insurance rejected or has decided not to honor the claim. I will wait for your requirements to make the request.

Please, notify me here as soon as you have the requirements.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Denial by insurance or other programs does not preclude people from being eligible for assistance from programs outlined in the Action Plan.

Comment: #316_10-21-18_David Rodríguez Andino

“Regarding the Whole Community Resilience Planning program:

This program's goal must be to produce: “Community recovery plans whose benefits will allow communities to develop policies, planning and management capacity that can determine its needs, rationally and effectively, establish long and short term goals, prepare programs and activities to fulfill goals and objectives, evaluate the progress of said programs in the fulfillment of said goals and objectives and perform the management, coordination and follow-up of the activities that are necessary to efficiently implement the planning”.

The Foundation for Puerto Rico is mentioned as an associate of the program together with the Department of Housing and Urban Development. What are Foundation for Puerto Rico's qualifications to perform this task? What experience does said foundation have to carry out the necessary tasks in said plan?

This organization presented public commentary on the first draft of the Action Plan and its focus was on tourism aspects that promote the concept of "tourist economy". This shows that the organization's experience lies on tourism and economic development. The work to accompany and empower communities is completely different from the one that Foundation for Puerto Rico seems to have. What criteria was used to choose said organization as a partner of this program? Was the criteria made public? What were the other organizations that were considered to become partners of the program?

Jon Borschow is Foundation for Puerto Rico's founder, and he's also the DMO's president for tourism. Is this not a conflict of interests? In many cases, touristic developments leave out the communities that are intended to be affected through this program. As a matter of fact, the visitor's economy promoted by Jon Borschow and Foundation for Puerto Rico directly clashes with the idea of creating more resilient communities. How does the Housing Department intend to save this conflict that clearly seems insurmountable?"

PRDOH Response: The Whole Community Resilience Planning program and the Tourism and Business Marketing program are separate components of the recovery planned by PRDOH . Please review the Action Plan program description regarding this program and the role of the Foundation for Puerto Rico.

Comment: #317_10-20-18_Luis Gallardo (Habitat for Humanity)

"Habitat for Humanity is again appreciative of the opportunity to submit comments in regard to the Housing Department's ("PRDOH ") first substantial amendment to its CDBG-DR Action Plan. Habitat feels that this amendment is an opportunity to not only expand the scope of the original Action Plan but also to fortify and fine-tune already contemplated initiatives. Habitat for Humanity has long pushed Congress to provide adequate funding for areas impacted by natural disasters, with said funding representing a lifeline for the people of Puerto Rico to re-build a more resilient society. Habitat hopes that its ample experience in affordable, accessible housing and disaster recovery will contribute to the improvement of this CDBG-DR Action Plan amendment. For that reason, we hereby submit a number of comments and suggestions, organized each program's original order per the revised Action Plan draft.

1. General participation of nonprofits in CDBG-DR activities

Habitat again suggests broadening a variety of the proposed and updated programs to permit for nonprofit organizations to apply directly on behalf of eligible individuals and families. The Home Repair, Reconstruction, or Relocation Program; Title Clearance Program; Community Energy and Water Resilience Installations Program; Multi-Family Reconstruction, Repair & Resilience Program; the Workforce Training Program; and the initial capacity-building component of the Construction and Commercial Revolving Loan should all permit for the application of nonprofits with a track record of similar activities. Nonprofits can leverage significant non-federal resources

and utilize technologies, behavior-changing models and processes to obtain a higher value to cost ratio when it comes to utilizing their respective allocations. Not to mention, many nonprofits have homeownership education and workforce development programs that could be bundled with their CDBG-DR-funded offerings, and thus provide for better overall financial security for individuals, workers, and families, as well as better use of CDBG-DR funding.

In recent weeks, PRDOH officials have publicly discussed plans for the creation of an independent advisory Council that would work side-by-side with public officials as part of the Department's citizen outreach. Habitat commends this initiative and suggests that the proposal formally form part of the Action Plan and that its roles and scope also be specified. These may include how the public participation will take place throughout CDBG-DR implementation. The Council should be representation from non-profits, foundations, community-based groups, housing intermediaries, Community Housing Development Organizations (CHDOs), professional groups, private financial institutions, and other representatives of civil society."

PRDOH Response: Thank you for your comment. PRDOH has taken this into consideration. The Action Plan offers multiple opportunities for NGO's to apply for assistance. PRDOH values collaboration with non-profit organizations throughout the life of the grant.

"Whole Community Resilience Planning

Habitat again reiterates its support for Whole Community Resilience Planning. Solutions need not only be seen at a national policy level but also at the community level. The active role of citizens in a community-based planning process is crucial not only to assure the viability of government efforts but also their long-term continuity. Nevertheless, Habitat feels that \$500,000 may be too high of a cap for a single community. Many local governments, for example, spent much less on their city-wide Land Use plans during the 1990s and 2000s, the cost of these plans ranged from \$60,000 to \$150,000 depending on their complexity. Habitat suggests lowering the maximum amount to \$250,000 to accommodate a larger number of communities to be served. Criteria should also be established to assure that funding distribution is proportional to population and need. Seventy-eight percent (78%) of all municipalities have a population of less than 50,000 and only 6% have a population of more than 100,000. Some communities in the urban areas might be larger than entire municipalities.

Per the revised CDBG-DR Action Plan draft, these holistic plans will include items such as "land use, relocation, acquisition, and resilience measures" and will prioritize investments in "housing, infrastructure, economic development and revitalization, health and environment, and education". Though Habitat is pleased with this approach, the issue of housing affordability and land tenure should be explicitly included. In regards to the latter, Community Plan conclusions could be channeled through the Title Clearance Program already contemplated in the CDBG-DR Action Plan. Housing affordability and tenure security are two of the most impacting factors in measuring families' vulnerability, and a scarcity of both will decrease their ability to recover from a natural disaster.

The CDBG Action Plan already contemplates the need for municipal "data gathering, studies, analysis, and preparation of plans", permitting for up to \$20,000 to be utilized by local governments for said purpose. Despite this, and considering the extensive community planning

activities carried out by some municipalities, Habitat feels that this reimbursement cap should be increased to up to \$100,000, also proportional to population and need. Most importantly, all future data collected by subgrantees should be interchangeable and follow Planning Board approved file formats and specifications. It would be a shame for so many municipalities and communities to carry out such work without widescale interchangeability.

The Action Plan likewise requires for Community Plans to be “informed”. The Government’s Economic and Disaster Recovery Plan also highlights the need to make high-quality data available to support better decision making. Considering this, amendment text should be expanded to clarify that recipients of Whole Community Resilience Planning may carry out research and viability studies to assure that plans are evidence- and data-driven; further increasing their feasibility and minimizing the possibility of poor usage of limited public funds.

Habitat supports community-led approaches to mapping and data in general. Eligible activities for Whole Community Resilience Planning should thus include community organization efforts. This without a doubt will be a crucial component in the creation of viable Plans and represents one of the most time-consuming activities of resilience planning in general. Furthermore, address mapping is also crucial for emergency services and is largely absent in primarily low-income and rural areas. Street naming and identification, structure number assignment, and address mapping should also be eligible expenses to assure that solutions are community-led instead of top-down.

PRDOH Response: Thank you for your support of the Whole Community Resilience Planning program. PRDOH believes in a recovery driven by shared data. Although \$500,000 is the cap for the Whole Community Resilience program, it is not expected that every award will be in this amount. Guidelines for the Whole Community Resilience program are expected to be posted to www.cdbg-dr.pr.gov in quarter one of 2019. PRDOH will take these comments into consideration during further development of program guidelines.

“The Home Repair, Reconstruction, or Relocation Program

The PRDOH should establish a preference for relocations from floodplains to replacement dwellings within or surrounding a given community, though always respecting the home dwellers right to choose. Relocation efforts should be aligned with legislation in place, such as that found in Law 1-2001 (“Law for the Integral Development of Special Communities”) which promotes the integrity as opposed to displacement of communities, and Law 489-2004 (“Law for the Integral Development of the Caño Martín Peña Special Planning District”), which prioritizes relocations within said District. Likewise, many HUD projects also give preference to former residents who want to return to their communities. This may be done either through increased identification efforts on behalf of the HUD-certified housing counselors handling families’ cases or a higher regional cap for relocations occurring within the same community.

The Home Repair, Reconstruction, or Relocation Program contemplates the utilization of CDBG-DR funding to cover acquisition costs, providing up to \$150,000 for the purchase of a replacement home or lot outside of unsafe areas. However, recent and expected legislation is available to drastically lower the cost of property acquisitions by local governments of abandoned and nuisance properties. Acts 13-2015, 130-2016, 157-2016, as well as House Bill 875, for example, allow for low-cost or even cost-free acquisition of nuisance properties on behalf of municipalities.

These tools provide for an opportunity for homeowners and PRDOH to free up more resources for rehabilitation of rescuable structures and new construction on vacant lots.”

PRDOH Response: Thank you for your comments. As outlined in the Action Plan, the first option for voluntary relocation includes purchase of an existing property. This approach maximizes infill opportunities and respects the homeowners right to choose. PRDOH will take this information into consideration during further development of program guidelines.

“Title Clearance Program

Access to limited legal services is without a doubt one of the biggest impediments to low-income families in assuring their security of tenure. Nevertheless, this is not the only impediment to title clarification, with sluggish legal and administrative procedures also representing a major obstacle. Synchronization between relevant agencies as well as the streamlining and modernization of these title-related processes should be contemplated in order to bridge the Title Clearance Program with the Agency Planning Initiative program already included in the CDBG Action Plan.

PRDOH should also consider allowing non-profit organizations to access Title Clearance Program funding. Considering the current market rates for title clearance services, Habitat estimates that only 2,000 to 8000 families can be served by this program. On the other hand, non-profits that currently offer the same service can drastically decrease said costs and increase the amount of participating families to more than 13,000. The Action Plan should also permit for said funding to be utilized for the hiring of surveyors and other technical services often needed for title clearance.

PRDOH Response: Thank you for your comments. PRDOH will take these into consideration during further development of this program. Limited legal services are a component of the Title Clearance program, but are not intended to be the only method used to address title issues.

“The Multi-Family Reconstruction, Repair & Resilience Program

According to the proposed CDBG-DR amendment text, assistance for this program is “rendered in the form of a performance-based loan as secured through a promissory note. The note will be forgiven when all contractual obligations have been met, including satisfactory completion of construction, compliance with the fifteen or twenty-year affordability period, depending on the number of units, and conditions found in the Land Use Restriction Agreement.” Habitat for Humanity wishes for further clarification concerning the fifteen to twenty-year affordability period, as the language concerning its application is currently unclear. What would occur after the aforementioned period? Is the performance-based loan low-interest? Would the affordability requirement be pegged to the Fair Market Rent for the respective region?

PRDOH Response: Thank you for your comment. 15 or 20-year affordability periods are determined based on guidance included in 83 FR 40314. PRDOH will take these questions into consideration during further development of this program.

6. Revised income levels

Per the CDBG-DR amendment draft, the PRDOH has worked with HUD to ensure that income limits are adjusted as needed to ensure access to program services to families in need. HUD recently approved said adjustments and has promised to release updated income tables in the near future. Habitat has long pushed for the bulk of CDBG-DR funding to be utilized for Low and Moderate-Income Residents and feels that the revision of the applicable income limits is necessary in order to consider the particularities and context of Puerto Rico's socio-economic reality. Habitat for Humanity thus endorses and applauds the PRDOH's efforts in this regard.

PRDOH Response: Adjusted income limits were approved by HUD. Income limit tables applicable to Puerto Rico can be found on PRDOH's website at www.cdbg-dr.pr.gov.

"Abandoned and vacant properties

As previously mentioned, the acquisition and rehabilitation of abandoned and vacant properties may represent savings for the Home Repair, Reconstruction, or Relocation Program. The CDBG-DR Action Plan also states that the renewal of existing and vacant housing units will be a "primary course of action" for its relocation efforts. Likewise, a high number of municipalities submitted CDBG-DR proposals for the acquisition of nuisance properties. Despite this, few local governments have inventoried these properties per their required laws; a process that if delayed may difficult the rollout of the Home Repair, Reconstruction, or Relocation Program. For this reason, Habitat proposes that nuisance inventory and abatement activities should be included in the City Revitalization Program as well as the reimbursements earmarked per municipality in the first phase of Whole Community Resilience Planning, further justifying the increase of the latter.

Habitat for Humanity hopes that the above-mentioned comments will assist PRDOH in assuring a holistic and effective approach to Puerto Rico's disaster recovery and resilience efforts. If you or your staff have any follow-up questions or would like to discuss in further Habitat's positions or potential contribution to either of the above-mentioned programs, we are more than happy to be of assistance."

PRDOH Response: Thank you for your comments. PRDOH values the input and looks forward to continued collaboration with Habitat for Humanity and other organizations.

Comment: #318_10-21-18_Máximo Torres (Maximo Solar Industries)

Summary: The comment offers information about Maximo Solar Industries, one of Puerto Rico's largest solar energy, and its vision to transform the lives of present and future generations through renewable energy. The submission also includes the following specific feedback regarding the Action Plan:

"The Voucher System in the Community Energy and Water Resilience Installation Program states that it will provide to eligible homeowners "a voucher for a gas or solar powered water heater, and/or gaspowered stove, installation and related appurtenances so that residents can perform basic functions such as showering and preparing meals at home in the event of a power outage".

§ Maximo Solar proposes to include in the solar powered refrigeration systems in this portion of this program.

Solar powered refrigerators are refrigerators that use small photovoltaic solar panels and small integrated energy storage systems (batteries) that power the appliance completely “off grid” and, if used correctly, function on cloudy days and during night-time. They are usually characterized by thick insulation, which maintains cold temperatures, LED lights and use of DC, not AC, compressor. In the event of an electrical blackout, these refrigerators will operate.

Households that own such appliances would be better equipped and more resilient to confront short or long periods of time without electricity. Those families would be able to buy fresh products, and through market values, help restore the local economy and normality.

B. The Community Energy and Water Resilience Installation Program promotes water catchment systems that will provide households with the ability to collect and store rainwater to be used for bathing and consumption, if used in concert with a purification filter or system.

- Maximo Solar proposes that solar powered atmospheric water generations and purification systems should be included as a viable option that further diversifies the means to achieve water resiliency.*

Until the electrical transmission and distribution lines could be restored and connected to Puerto Rico’s water treatment plants, access to clean water became the number one issue for many people struggling to obtain potable water for cooking and consumption. Many, in desperation, turned to questionable water sources such as creeks, streams and natural springs. It is thought that this was a mayor contributing factor to the outbreak of leptospirosis, which led to the death of several people in Puerto Rico and infected many more. In recent memory, there is no other time where the need for water resiliency was better exemplified.

Though the Energy and Water Resiliency Program address the issue, the language utilized in the program description reads in such a manner as to only incorporate rain water catchment systems, ignoring the potential benefits of solar powered atmospheric water generation systems. These aforementioned systems harvests moisture trapped in the air and filters it to remove particles and airborne bacteria. The resulting water is one clean and free of chemicals. In domestic use, they can reduce or eliminate the need for bottled drinking water. Atmospheric water generation systems need humidity for optimal water production.

Puerto Rico’s sub-tropical climate is ideal for this type of system, providing unlimited moisture to be converted to drinkable water. Most importantly, solar powered water generation systems usually operate completely off grid so that in the event of an electrical blackout, these water generation systems will continue to provide potable drinking water.

Funding and Disbursement Method

For all of us that lived through Hurricane Maria there are now two Puerto Rico’s, one before and another after. Many of us lost loved ones or had to say a temporary or permanent goodbye to a friend or family member that needed to leave the island amidst the destruction left by both Hurricane Irma and Maria.

Puerto Rico was in crisis, but, like in all crisis, opportunities present themselves. With the CDBG-DR we have the opportunity to rethink, reimagine and rebuild Puerto Rico.

In regard to energy resiliency, the Substantive Amendments to the Disaster Recovery Action Plan are a good starting point, but are not enough for such a critical necessity. The most aggressive program for energy resiliency in the Action Plan is the Community Energy and Water Resilience Installation Program that assigns a budget of four hundred and thirty-six million dollars (\$436,000,000.00) for retrofitting homes with renewable energy sources and water catchment systems. The first observation is that the amount of funds destined for photovoltaic solar systems is not specified. Since the program strives for both water and energy resiliency, the portion destined only to energy resiliency is still unclear.

Although \$436 million dollars is a substantial amount of public funds, put into context, this amount of funds pale in comparison to the overall budget of the CDBG-DR (Approx. \$20 billion) and the importance of energy resiliency demonstrated after the collapse of our electrical grid. Retrofitting households with photovoltaic solar systems means that individual households become prosumers (energy producers) and in the event of another atmospheric disaster that collapses the electrical grid, thousands of households will still have energy. One simple question reveals the significance of what we are arguing: if you had the option of buying a plane ticket to leave the island after a hurricane, would you stay in your house without energy or water?

The answer is probably no. That's why it is imperative that out of the \$20 billion assigned funds of the CDBG-DR, at least one billion (\$1,000,000,000.00) be assigned to solar energy and energy storage systems. Energy is the driving force of economic development and renewable energy a driving factor of sustainability.

In addition, we recommend that funding be provided directly to program beneficiaries to subsidize photovoltaic solar systems based on the number of kilowatts needed to efficiently energize the household.

In this way, individuals would be more empowered in gaining energy resiliency. Subsequently, this will let market forces determine which company provides the equipment and services instead of a government agency. Creating a more fair and transparent process.

We also stress the importance of rapid disbursement of funds once the photovoltaic system is installed and connected to the electrical grid as to incentivize fast and efficient installations. Lethargic and bureaucratic processes in soliciting and obtain monetary reimbursement for systems that have already been installed could caution companies from participating in the program. Renewable energy companies cannot withstand long periods of time on promises of payment alone. This could create internal company quotas on the maximum amount of installations they can withstand in a month or a year due to sluggish reimbursement of funds severely delaying the implementation of the Community Energy and Water Resiliency Program.

Finally, funds should be disbursed once installation of the photovoltaic system is completed and before approval of PTO (Permission to Operate) emitted by PREPA, or any other authority. Historically and accordance to many reports, the solar energy consumers have had a long and strenuous relationship with PREPA in regard to PTO approval. In fact, the interconnection process and that will end in a PTO is one of the lowest of the nation. It is customary for PREPA to approve PTO's almost a year after installation and connection to electrical grid. To reimburse companies

after PTO approval would be to punish solar energy companies for the bureaucracy and mismanagement of others.

Maximo Solar Industries is at the disposal of the Puerto Rico Department of Housing and wishes to extend an open-ended invitation to discuss and collaborate in any and all matters regarding energy resiliency and CDBG-DR programs with the Honorable Department."

PRDOH Response: Thank you for your comments. PRDOH will take this information into consideration during further development of programs included in the Action Plan or during development of new programs, if additional funding becomes available.

Comment: #319_10-20-18_Jorge L. Morales (DDEC)

"As per the "Amendment of the Puerto Rico Disaster Recovery Plan" (the "Recovery Plan"1 draft October 21st, 2018 public comments' deadline, via this missive I, Manuel Laboy Rivera, in my capacity as Puerto Rico's Secretary of Economic Development and Commerce, submit the following comments that the Department of Economic Development and Commerce ("DEDC") would like to see made into the Recovery Plan:

To meet Puerto Rico's long-term recovery needs, the following comments reflect the necessary changes and additions that will be critical for the successful implementation of the economic development projects and programs outlines in the Recovery Plan.

Comment #1 - Construction and Commercial Revolving Loan (Capacity Building Capital Investment)

On page 153, we request that the word "year" must be added to the second sentence of the first paragraph. It should read:

"This is the first phase of the CCRL which will not be subject to repayment terms until the contractor secures a construction contract or one (1) year passes, whichever comes first."

Comment #2- Small Business Financing (Recovery Grant Program)

On page 157, we request that examples of uses for the working capital section be detailed as specified in the Working Capital Revolving Loan Section.

In addition, we request that a definition for larger projects be included in the Option B: Term Loan for Larger Projects section.

Comment #3- Tourism & Business Marketing Program

On page 166, the Action Plan provides a description of the Tourism and Business Marketing Program ("T&BM Program"). It stipulates that Invest Puerto Rico ("IPR"), a nonprofit organization, will use Community Development Block Grant-Disaster Recovery ("CDBG-DR") funds to aid not only new businesses, but for expanding the existing companies in Puerto Rico as well. (Our emphasis).

For the record, the Department of Economic Development and Commerce ("DEDC") states that the purposes and powers of IPR, as defined by Act 13-2017 which creates the nonprofit

corporation, limits IPR's operations to new business; DEDC will continue providing assistance to expanding and existing companies throughout the Island.

As previously stated, Article 2 of Act 13-2017, Purposes and Powers, states that:

"The Corporation will be the organization in charge of promoting Puerto Rico as an ideal place to do business and will be mainly in charge of attracting new businesses of external capital, capable of contributing additional capital to our economy."

It also states that:

"The powers of the Corporation will include, among others:

(a) Market Puerto Rico as a pro-business jurisdiction to encourage new external investments, including the development of export strategies for goods and services; (b) Identify and capitalize on interstate and international trade opportunities;

(c) Attract capital investment from new businesses, as defined in Article 3 of this Law, to promote economic development and create new jobs;"

The same Act in its Article 3 provides the definition of New Business as:

"New Business" means an entity that meets the following criteria:

(a) Has never engaged in a trade or business in Puerto Rico;

(b) The trade or business to be engaged in Puerto Rico was not acquired from a business that was engaged in an income generating trade, business, or activity in Puerto Rico;

(c) It is not an affiliated entity of an entity that is engaged or has been engaged in an income generating trade or business in Puerto Rico;

(d) Not more than five (5) percent of its shares are held, directly or indirectly, by one or more residents of Puerto Rico;

(e) Shall begin operations in Puerto Rico, as a result of the efforts of the Corporation; and

(f) Shall not be engaged in the retail sale of goods in this jurisdiction."

Comment #4 - Strategic Projects and Commercial Redevelopment

On page 16, the Action Plan provides a description of the Strategic Projects and Commercial Redevelopment. After DEDC's review of its leading Strategic Projects, we believe that the projected of \$50MM should be increased to \$300MM. As an example, just two of our Strategic Projects amount \$75MM; the increased amount will help us serve most underdeveloped municipalities and redeveloped them up to par with other counties. (Please, see Attachment A).

In addition, DEDC proposes an additional description to the "Redevelopment Projects" definition. It should read the following way:

"Special economic activities provide for the acquisition, constructing, reconstructing, rehabilitating, or installing commercial or industrial buildings, structures, and other real property equipment and improvements, industrial parks and business park redevelopment, including

railroad spurs or similar extensions. These are economic development projects undertaken by nonprofit entities and grantees (public entities)." (Our emphasis).

Based on the aforementioned, DEDC strongly advises that CDBG-DR funds assigned to Invest PR be solely to attract new investment to Puerto Rico and not to be used on expanding/existing companies already established on the Island.

Thank you for your consideration and assistance in this matter. I look forward to continue working together on this important plan to rebuild Puerto Rico to make us stronger and more resilient than ever.

<i>PRO-Tec</i>	<i>CORCO- PR- 127</i>
<i>Environmental Consultant - \$60K</i>	<i>Environmental Consultant- \$80K</i>
<i>A & E Design - \$1.26MM</i> <i>Phase I Environmental Site Assessment - \$8K</i>	<i>A & E Design - \$372K</i> <i>Phase I Environmental Site Assessment - \$18K</i>
<i>Phase II Environmental Site Assessment - \$15K</i>	<i>Phase II Environmental Site Assessment- \$32K</i>
	<i>Phase III Environmental Site Assessment- \$120K</i> <i>Groundwater testing</i> <i>Subsurface soil assessment</i> <i>Sediment testing</i> <i>Assessing pathways of contaminants in soil and groundwater, among others.</i>
<i>Environmental Impact Assessment - \$350K</i>	<i>Environmental Impact Assessment- \$350K</i>
<i>Permitting Process and Legal Fees - \$180K</i>	<i>Permitting Process and Legal Fees - \$180K</i>
<i>Land Purchase- \$4.4MM (based on Naguabo estimates)</i>	<i>Land Purchase- \$3.8MM (based on Penuelas estimates)</i>
	<i>Remediation - \$14MM</i>
<i>Capital Cost- OTEC- \$23.4MM</i>	<i>Capital Cost- \$6MM</i>
<i>Operations, Maintenance, Repair and Replacement (OMR&R) - \$3.4MM per year</i>	<i>Operations, Maintenance, Repair and Replacement (OMR&R) - \$2.2MM per year</i>
<i>Industrial Park - only Major</i>	<i>Research Center- only Major</i>

Infrastructure- \$10MM	Infrastructure - \$5MM
Total: \$42.873MM	Total: \$31.352MM

PRDOH Response: Thank you for your comments. The Action Plan has been revised to address comments. PRDOH values the partnership of DDEC and looks forward to a continued positive working relationship with them throughout the life of its CDBG-DR grant.

Comment: #320_10-21-18_María Hernández (Clínica de Asistencia Legal Escuela de Derecho UPR)

"Presentation of the Land Trust of Caño Martin Peña

My name is Maria E. Hernandez Torrales and I appear before you in my capacity as President of the Board of Trustees of the Land Trust of Caño Martin Peña in San Juan. The Land Trust is a private non-profit organization, created in perpetuity and it is created by provision of Law 489 of 2004, as amended. This organization collaborates with the G-8, the Group of the Eight Communities Surrounding Caño Martin Peña and the Corporation of the ENLACE Project of the Caño Martin Peña to achieve the redevelopment of the Special Planning District of Caño Martin Peña, as planned with the active and informed participation of the communities in the district.

This project aims to allow the environmental recovery of Caño Martin Peña, an important water body for Puerto Rico, and at the same time, it serves the rehabilitation on site of seven communities that have been living in this land for more than one hundred years, as it is the case of some of them. It seeks to overcome the conditions of marginalization and vulnerability without this entailing the displacement and rupture of the social structure and support networks created over so many years. This objective of Land Trust is in harmony with the established public policy of preventing the involuntary displacement of those residing in the heart of San Juan.

This Land Trust was awarded the World Habitat Award 2015-16, for our vision of housing as a human right and its inclusive nature with focus on people with very low income and women as heads of the family. It is the instrument designed from the seven communities that comprise the District for the making of its development plan and at the same time, and among other purposes,

- 1. to ensure the provision of affordable long-term housing,*
- 2. to prevent involuntary displacement or gentrification of our communities, and*
- 3. to regulate land tenure for those who do not have property title.*

This allows that more than 15,000 residents and 300 businesses of the District benefit from improvements in infrastructure, housing and dredging of the water channel. These works will significantly reduce the risk of flooding with used and contaminated water that affects thousands of people and homes.

The property of the Land Trust consists of more than 200 acres of land in San Juan, the vast majority of them in the place where the residences of its members are located. However, part of the corpus of the Trust is also comprised by vacant land suitable for the development that benefits the communities of the District and, therefore, the city of San Juan. The members of the Trust

collectively own the land, which by law cannot be sold, but they also own individually their home and the right of the area over the lot where their house is located. This arrangement allows solving the problems of ownership that afflicted these families before the creation of the Trust.

The Land Trust is the institution called to make the development of housing on the District's land viable. The CDBG-DR funds represent a great opportunity to develop and maintain affordable and dignified housing, as well as to continue the work leading to the improvement of the quality of life of these low and very low income communities. It is also important to note that while the model proposed in the revised Plan provides for a period of affordability of housing for a defined term of 10 or 15 years, the model of the Land Trust allows housing developed using subsidies to be maintained affordable in perpetuity maximizing the benefit of money received through these non-recurring funds. This is achieved by maintaining the control (stewardship) of the house and the land, using the first refusal and pre-emptive rights and limiting the profit that could be derived in case of resale by the owner. Considering this new model to maintain affordable housing is consistent with the revised Plan's approach, which is reflective, coordinated and seeks the transformational recovery for our Island, generating social capital by rebuilding families and communities.

The Trust is the ideal entity to channel federal funds and housing development in the Caño Martin Peña Special Planning District, not only to achieve decent housing at affordable prices, but also to ensure that such housing can remain affordable in perpetuity.”

PRDOH Response: Thank you for your comments. PRDOH will take this information into consideration during further development of programs outlined in the Action Plan. The Whole Community Resilience Planning program offers an opportunity for communities to create long-term plans for thoughtful and resilient community-wide recovery.

Comment: #321_10-20-18_Julita Casa (Bajadero de Lares)

“HELLO, MY NAME IS JULITA CASA, COMMUNITY LEADER OF THE DISTRICT OF LARES. I HEREBY DESCRIBE SOME OF THE NEEDS OF THE COMMUNITY :

- 1. TO FIX THE COURT AND INSTALL ITS ROOF AND BLITCHER*
- 2. TO MAKE MAILBOXES WHERE EACH HOUSE RECEIVES CORRESPONDENCE (AS CORRESPONDENCE IS RECEIVED IN A SINGLE HOUSE FOR THE WHOLE COMMUNITY).*
- 3. A COMMUNITY CENTER FOR OUR ACTIVITIES IS NEEDED*
- 4. HELP WITH THE HOUSING STRUCTURE (E.G., WOOD, CEMENT, PAINT, BARS AND ETC.)*
- 5. HELP TO GET JOBS SINCE WE ARE LACKING INCOME*
- 6. A SMALL RECREATIONAL PARK FOR CHILDREN. WE WILL APPRECIATE THE IMMEDIATE HELP YOU CAN GIVE US.”*

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low and moderate-income households, prioritizes elderly applicants and aids

eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #322_10-20-18_Puerto Rico Hospital Association

“Puerto Rico Hospital Association Need and Proposed Solution:

First responders and Public Safety organizations such as the Puerto Rico Hospital Association (the Association) require a unified Land Mobile Radio (LMR) communications network that will allow all related organizations (e.g. Hospitals, Urgent Care Clinics, Dialysis Centers, Pharmacies, Ambulances, EMT’s, etc.) to communicate with each other, at all times, in a unified and efficient manner, and coordinate between the public and private sector quickly in responding to and recovering from a natural disaster.

The Association has made the decision to deploy an Energy Independent Island Wide Emergency Response and Business Continuity Infrastructure Network based on DMR technology. The Association has determined the network is a necessary expense related to disaster relief, long-term recovery, and restoration of infrastructure, housing and economic revitalization. Most importantly, it solves an unmet infrastructure need that will save lives. In addition, the network will ensure critical public safety supply chains supported by small, medium and large businesses operating in the US territory of Puerto Rico remain resilient and that lifelines remain open.

The goal of this initiative is to:

- Integrate with Local (Police, Fire & Rescue, EMT’s, etc.) and Federal authorities (FEMA, DHS, etc.) to facilitate communication and coordination during emergencies.*
- Be energy independent and self-sufficient (no dependence on PREPA).*
- Be designed with complete and total redundancy in order to ensure communication at all times before, during and after natural disasters.*
- Facilitate both communication, data connectivity and site monitoring (e.g. security, generators, diesel fuel, battery backup, etc.) for Hospital Association members and PR healthcare stakeholders.*

The Association, as a bona fide non-profit organization, is an eligible entity to receive CDBG-DR funding under section 105(a) (15) of the HCD Act, and is seeking grant funding as a subrecipient to PRDOH . It is eager to submit a grant to the appropriate counterparty and can deliver its solution within 90-120 days.

Due Diligence: The Puerto Rico Hospital Association carefully reviewed the Federal Emergency Management Administration’s (FEMA) 2017 Hurricane Season FEMA After Action Report July 12, 2018 (FEMA Report), Governor Ricardo Rossello’s November 2017 Request for Federal Assistance for Disaster Recovery titled Build Back Better Puerto Rico, the Puerto Rico Department of Housing

(PRDOH)’s June 14, 2018 First Action Plan submission to HUD on various ways to distribute \$1,507,179,000 in CDBG-DR funds through HUD grant number B-17-DM-72- 0001, The Puerto Rico Central Recovery and Reconstruction Office (COR3) Transformation and Innovation Plan submitted to Congress August 8, 2018, The fiscal Plan for Puerto Rico as submitted to the Financial Oversight and management Board for Puerto Rico on August 20, 2018, PRDOH ’s Second Action Plan posted for comment September 21, 2018, and relevant affiliated documents. In addition to these documents, the Association has culled data and feedback from the US Congress, its Association membership, key public safety stakeholders, the media, publicly available information, and federal and local government agencies in identifying this communications network solution.

Background, Challenges and Proposed Solution: La Asociacion de Hospitales de Puerto Rico (Puerto Rico Hospital Association, or Association), founded in 1942, and its membership bring together 67 of the 70 hospitals duly licensed in Puerto Rico. The Association represents other institutions, such as: Diagnosis and Treatment Centers, Independent Ambulatory Surgery Centers, Ambulatory Services Centers, Health Homes, and distinguished figures in the health care field among others. Its purpose and mission are to ensure excellent health quality standards for all communities in Puerto Rico.

As a result of the damage inflicted on Puerto Rico by Hurricanes Irma and Maria, the residents of Puerto Rico suffered tremendous losses of life due to a host of reasons, much of which was due to a lack of communications that permitted the different Public Safety organizations to work together. The failure of this lifeline infrastructure and the Association’s inability to communicate between public safety organizations, government (federal and local), first responders, medical institutions and private sector institutions delayed the recovery and more importantly affected the Puerto Rico government’s ability to attend the medical needs of American citizens residing in the Island. Such failure was noted in an August 29, 2018 study the government did in conjunction with the Milken Institute School of Public Health at The George Washington University.

The George Washington University study reports that Puerto Rico Government personnel and key leader interview respondents indicated that communication contingency plans were not in place to anticipate multiple cascading failures of critical infrastructure and key resource sectors. Consequently, the central government was not prepared to use alternative communication channels for health-related and mortality surveillance, public health information dissemination and coordination with communities, including radio and interpersonal communication. Further, an Urban Institute research report for the Puerto Rico Health Care Infrastructure Assessment stated that a shortage of medical professionals such as midlevel providers like physician assistants, nurse practitioners and specialists exacerbate the needed infrastructure reforms.

Understandably, without a functional telecommunication system, during and after a major storm or other natural disaster, the Association experienced a communication breakdown between its hospitals, doctors, and service providers. The Association faced severe complications in determining site status, where goods and services were most needed, and was unable to appropriately coordinate with FEMA and other federal agencies. Pharmacies struggled to stay open, access to patient therapies were unreliable / unavailable, and the important patient / doctor relationship compromised. Patients faced undue psychological consequences and

hopelessness as they waited for support that was unable to respond, and sadly, the communications breakdown put the Association in a precarious position to deliver life-saving therapies. The lack of reliable, fully operative telecommunication facilities not only impacted public safety on the island but it caused irreparable damage to Puerto Rico's economy and has negatively impacted thousands of small businesses, the heart of the island's private sector and its principal job creator. Businesses in Puerto Rico were unable to communicate effectively with their employees, suppliers, customers, banks, and health and security-related entities, among others, resulting in a supply chain failure, more closed businesses, loss of jobs, increased migration, and loss of revenue to a government currently faced with serious financial problems. These challenges unnecessarily increased the death toll on the island and made an already challenging recovery worse. Disturbing factors that complicate the situation further and call for urgent corrective action to minimize the island's telecommunication problems, is that Puerto Rico's hurricane season extends from June 1 to November 30 and the island's mountainous center, where many telecommunication towers are located, are always very adversely affected and take a longer time to repair.

It is important to remember the initial and sometimes prolonged human hardship caused by telecommunication problems on individuals and their families, such as: not being able to go to work or school; shop for food either because stores were closed because of damage or for lack of supplies or long lines (the same for gasoline); not having cash because most banks were closed and ATMs were not functioning; not being able to call for medical services or go to hospitals because many were closed or not offering all essential services; not being able to call police or the fire department in emergency situations; and not being able to communicate with relatives, on or off-island, who were very concerned with their well-being.

Currently, many emergency medical service (EMS) crews and their hospitals require two dispatchers to radio communicate with one another because EMS has its own Land Mobile Radio (LMR) system, while hospitals typically use the police LMR system and the two systems are not interoperable. Puerto Rico's Federal, State and Local government agencies have never had a resilient, island-wide and truly interoperable communications system, and the private sector Telecommunications Providers Networks were not resilient enough to survive a major hurricane. The inability to communicate cost lives.

As a result of the lessons learned from the recovery after Hurricanes Irma and Maria and the Association's extensive due diligence, it has made the decision to deploy an Energy Independent Island Wide Emergency Response and Business Continuity Infrastructure Network based on DMR technology. Network Integration will follow a two (2) phase approach. Initial phase will be integrated with all medical facilities in the Public and Private sector in order to concentrate on getting the network deployed, customers integrated and accustomed to utilizing the network. Then the network will enter into Phase 2 where the network will be integrated with Federal, State and municipal government agencies in order to better integrate Private Sector and Public Sector institutions that make up the backbone of Disaster Recovery.

The Association is ready to submit its grant, looks forward to opening a dialog on this important unmet infrastructure need that will save lives, and appreciates PRDOH 's consideration."

PRDOH Response: Thank you for your comment. Infrastructure projects may be eligible to receive assistance under the Critical Infrastructure Resilience, FEMA Coordination, or City Revitalization programs.

Comment: #323_10-20-18_Cora Arce Rivera

"I appreciate the opportunity to have participated in the public hearings held on October 19th, 2018 at the Multiple Use Center of Fajardo. It was enriching and, at the same time, sad to listen to the varied needs of the country, which have been made even more visible by the impact of Hurricanes Irma and Maria in Puerto Rico in 2017.

By means of this letter, I appear before this Committee that is collecting the input of the various sectors of the community on CDBG-DR 2018 funds, as an individual interested in the impact that these funds can bring to non-profit organizations and populations and the communities they serve. The work that this sector has done has been widely acknowledged, not only as part of the mitigation and response to the emergencies experienced in 2017, but as concerned and busy entities in providing the services and tools necessary for our country to continue strong in the face of diverse social, economic, health and educational challenges that affect us. It is important to highlight the data that stand out from the reports of Estudios Tecnicos, Inc. (2015), among which the following are mentioned:

- the third sector generated more than 150,000 jobs*
- while there is an increase in the rate of decrease for employment in PR, employment increases for the third sector*
- more than 800,000 people are served per year (2017 was exceptional, non-profit organizations served many thousands more)*
- the sector contributed 3.1% to GNP in payroll, that is, about \$2,194 million in 2013*
- while the cost of a health service per person for the government (on average) is \$1,363, for the third sector offering the same service is \$200; therefore, for every \$1 invested by the third sector, the government has to invest \$7*
- to offer educational services, for every \$1 invested by non-profit organizations, the government invests \$20.*

Regarding the Action Plan for Disaster Recovery; for the use of CDBG-DR funds in response to hurricanes Irma and Maria 2017, it presented the following remarks and concerns:

1. More opportunities for participation of the third sector must be expanded in the five established priorities: housing, economy, planning, infrastructure and multisector. It is important to remember that the third sector is more cost-effective than the government or for-profit subcontractors.

2. Based on comments made by some mayors from different towns in the east and south-east of the country, it is worrying to know how the funds will be made accessible to the communities. For potential use of the funds I recommend considering non-profit organizations (with knowledge about the needs, experience and reliability in the community) as entities responsible for receiving

and managing the funds in the best welfare of vulnerable communities in the country. The complexity of administrative procedures and political-party influences that could affect the rapid, equitable and fair access of the funds of the various programs under CDBG-DR is of great concern. Through community organizations, communities can access greater resources of CDBG-DR and, in turn, meet their real needs, such as: housing, community wells, infrastructure, sustainable energy systems, sustainable agriculture systems, etc.

3. In administrative terms, the document does not include the ways and means of distributing the funds, especially those few that indicate that there may be some participation of non-profit organizations. I suggest that you consider facilitating the processes of distributing funds to the Foundations that have experience in evaluating proposals and granting funds to non-profit organizations, such as: Community Foundation, Angel Ramos Foundation, BPPR Foundation, and Fondos Unidos.

4. Non-profit organizations (as they have shown) could either be centers of resilience to other events or emergencies and/or centers of economic development. For that, it is important to evaluate the tender proposed strategy of the PR for funds, since it limits the participation, and therefore the strengthening of a sector that has great potential to contribute even more. Resilience centers in the third sector can consider attractive proposals that widen what they already do, such as: sustainable agriculture centers, tourism centers, training and employment centers, etc.

5. Regarding the various proposals that mention the possibility of creating additional spaces to handle another event, it is pertinent to first evaluate that PR has several non-profit organizations that have the infrastructure, but perhaps they only need to be expanded or strengthened.

6. The Municipalities and the States should involve the third sector more in the prevention, mitigation and recovery (short and long term) processes.

Before the Government of Puerto Rico, the Housing Department of PR, the COR3, and the US Department of Housing, I very respectfully submit my humble comments about the Action Plan for Disaster Recovery; for the use of CDBG-DR funds in response to hurricanes Irma and Maria 2017."

PRDOH Response: Non-profit entities are eligible to apply for funding under several programs outlined in the Action Plan. PRDOH values collaboration with non-profit organizations and looks forward to a continued positive working relationship with the third sector throughout the life of the CDBG-DR grant. Please review the Action Plan for information regarding methods of distribution.

Comment: #324_10-21-18_Jarely Flores Torres (Alianza para la Incubacion de Microempresas Comunitarias Solidarias, Inc.)

"The socio-economic reality of the country requires that new ways of designing, drafting, developing and implementing public policies be viable. Eradicating poverty requires its comprehensive and holistic understanding. Currently, after Hurricane Maria, the country's

poverty rate is around 52.3% of the population. This indicates that most of the inhabitants of the country already live below poverty levels.

According to indicators of employment, unemployment and the labor participation rate, very few jobs are being generated in the country. However, one year after the hurricane, there has been an increase in self-employment. According to the Labor Survey of the Department of Labor and Human Resources (October, 2018), the estimate (not seasonally adjusted) of the people self-employed was 165,000 in September 2018. This number represents 4,000 more people, compared to the estimated in August 2018 (161,000 people). These data confirm that self-employment and micro-enterprises have continued to grow after the hurricane, so they should be seen as a serious, real and viable response to the economic development of the Island.

It is important to establish that in Puerto Rico, as of February 2013, the Alliance for the Incubation of Supportive Community Microenterprises (AIMECS), composed of six (6) incubators, all affiliated with non-profit organizations (OSFL). The Incubators represented by the AIMECS belong to the following organizations:

- *PECES, Inc. project (Humacao),*
- *Centros Sor Isolina Ferre, Inc. (Caimito),*
- *Cooperativism Institute of the University of Puerto Rico (Rio Piedras),*
- *Eco Recursos Comunitarios, Inc. (Caguas),*
- *Casa Sin Fronteras, Inc. (Arecibo)*
- *Alianza Desarrollo Comunitario, Inc. (Naguabo).*

The Incubators of Supportive Community Microenterprises of AIMECS are an economic engine that generates jobs, self-employment and micro-enterprises. This is shown by the results of some studies we have done to evaluate our performance in recent years:

- *Between 2013 and 2015, 169 people participated in the incubation processes.*
- *Of the 169 people who participated, 51% (86) undertook their microenterprise.*
- *More than 116 jobs were created.*
- *The cost of creating a job was between \$3,000 to \$5,000.*
- *78% of those who participated were unemployed.*
- *41% found, helped by the process, that it was not their time to undertake a business.*
- *Another 8% found that their business idea was not viable. Which helps to reduce the risks and failures when starting a commercial activity.*

However, for this period, an incubator received a government incentive of only \$17,014 in one year. With this very small amount, which almost borders on the absurd, the Community Microenterprise Incubators that make up the AIMECS obtained the results described above. Let's project how much more they could achieve if they had access to the resources and support necessary to fully develop their economic development activities. The six Incubators that make

up AIMECS are economic engines that focus and provide services to impoverished and vulnerable populations.

AIMECS submits for its consideration the following recommendations / proposals, such as strategies for the eradication of poverty:

1. To invest economically in the incubation of supportive community microenterprises, since this model is:

a. An engine of socio-economic development for traditionally marginalized communities of productive processes.

b. A strategy of community economic development for marginalized and impoverished sectors.

c. A creator of community entrepreneurship and supportive schools.

d. Author of educational and training projects of a culture of entrepreneurship in sectors where this educational management has never been done, capable of promoting processes of supportive self-management.

e. Creator of permanent training spaces in a Supportive Economy.

2. To define the incubation area of community microenterprises within the government's public policy, as an important basis for the country's economy, so that, in light of this public policy, an inclusive and pertinent strategy is developed that meets the real needs of this sector, considering that it represents successful ventures.

3. That the incubation strategy of supportive community micro-enterprises be assumed, as a strategy aimed at the eradication of poverty in Puerto Rico. Last Wednesday, October 17th, the Global Day for the Eradication of Poverty was commemorated and it would seem that the country has no concerted strategy designed to eradicate poverty. It is essential and necessary that sufficient and recurrent funds be allocated for these Community Incubators, as part of a concerted poverty eradication strategy.

4. Establish an Annual Fund of \$3 million dollars to be invested in the Incubators of Supportive Community Microenterprises and that it be administered by the AIMECS. This would allow to minimize unnecessary bureaucratic processes, so that funds are provided on time and directly, thus avoiding the repetition of what happened in the past. With this fund, at least 600 participants per year will be benefited. This amounts to an investment per capita of \$5,000 per year. Part of this fund will be used to strengthen incubation processes, adding elements that allow both incubators and entrepreneurs to effectively work on mitigation plans that reduce loss of lives and property, in the face of future disasters.

5. That this Fund be constant, in a period of 5 years or more.

6. That representatives of community incubators be included in the processes of design and development of regulations for reporting and results, rendering of accounts, and other purposes.

7. That the amount of \$500,000 per year be assigned to the AIMECS, as administrator of the Funds, in such a way that unnecessary bureaucratic processes that obstruct the availability of

resources to those who would use it effectively and efficiently are minimized. This fund will allow the creation of the necessary processes for a transparent administration, both in its distribution and in its rendering of accounts.

PRDOH Response: Thank you for your comments. PRDOH will take these suggestions into consideration during further development of the Small Business Incubators program, outlined in the Action Plan.

Comment: #325_10-20-18_ Maribel Aponte Garcia (University of Puerto Rico Rio Piedras Campus)

“Below please find comments on a fundamental component that should be included in the CDBG plan. Trade Value Chains, Strategic Export Plans and Small and Medium Business Resiliency to Natural Disasters

Problem Statement

Hurricane Maria’s impact on Puerto Rico disrupted trade value chains of small and medium enterprises (SMEs), leaving approximately 80-90% of the 45,000 SMEs that sustain PR’s economy by generating 83% of employment and 53% of PIB, inoperative. Some estimates assert that two-thirds of the island’s roughly 45,000 small and midsize businesses have closed temporarily; and that 5,000-1000 businesses won’t ever reopen.

The Graduate School of Business Administration at the University of Puerto Rico, Rio Piedras Campus, developed 12 Strategic Export Plans for SMEs. Since Puerto Rico doesn’t have an articulated Strategic Trade Policy nor a Trade Value Chain Analyses’ Institute, the school sought to contribute to generate trade strategies for SMEs applying an original method developed by two of its professors. MBA students worked as interns at SMEs during a semester and professors offered a graduate course that served as a Trade Value Chain Laboratory to develop Strategic Export Plans. When Hurricane Maria hit the island, these enterprises were at different stages of implementing their Strategic Export Plans. At the time, implementation had allowed some firms to reach at least one of the following results: increase in sales, production levels or job creation; new export markets, new customers and business contacts; regional and global awareness; and the establishment of a branch or representative office in a foreign country. At least 33% of our student interns were offered job opportunities in these SMEs.

After Maria, some of these SMEs need technical assistance to return to the implementation of these plans. Granja Pujols in San Sebastian (a low-income municipality) is a case in point. The award-winning woman entrepreneur who owns this SME lost 2,000 laying hens and hen productivity plummeted due to distress caused by the hurricane. As a result, she had been unable to follow up on her Strategic Export Plan. This was further complicated because her Plan contemplated exporting eggs to Caribbean islands also impacted by hurricanes.

Goals

- *Foster resilience enhancing capabilities for SMEs to support and strengthen economic development strategies linked to trade value chains’ creation and strategic export plans.*

- *Promote job creation and retention in SMEs as well as student internships that prepare students for these jobs.*

Objectives

Propose that CDBG plan includes:

- *Establishment of a Trade Value Chain Laboratory to develop Strategic Export Plans for SMEs and offer technical assistance to firms to incorporate strategic pathways to enhance resiliency in case of natural disasters and strengthen capacity to address vulnerabilities within the regional economy.*
- *University of Puerto Rico's (Rio Piedras Campus' Ph.D. Program in Business Administration) carry out a Pilot Project to identify alternatives to disruption of Strategic Export Plans' implementation due to natural disasters in order to enhance resiliency of SMEs and provide a framework that can serve other SMEs in the future."*

PRDOH Response: Thank you for your comment. PRDOH will take this information into consideration during further development of programs outlined in the Action Plan or during development of new programs, if additional funding becomes available.

Comment: #326_10-21-18_Aurelys Alers (Escuela de Derecho UPR)

"I did not know about the participation process of the first Action Plan or the public hearings that were held. The condition of houses in my community is of crass necessity. Puerto Rico has 3,501 homeless people, with San Juan being one of the first three municipalities with the highest concentration of homeless people. 1 Rio Piedras has a homeless population of Recently, 375 university students from Rio Piedras Campus of the University of Puerto Rico were evicted from their student residences. 2 The proposals of the Municipality of San Juan do not serve any of these two vulnerable sectors of the population.

The groups and populations that have greater housing needs that have not been addressed in the proposal of the Municipality of San Juan are the homeless and university students (one of the student residences was closed). The community needs a shelter for homeless and low-cost housing for the students. The plans presented in San Juan do not propose any solution or attention to homeless populations and university students.

Concerns about the proposal of the Municipality of San Juan:

- *The communities that will be displaced are not specified.*
- *The homeless community is ignored.*
- *The university student population is ignored.*
- *In 2015, the poverty level of university students, both undergraduates and graduates, reached 86% of the total student population.*

Other areas of attention:

- *At times when electricity is lacking and there is a need for fuel, the bicycle is an ideal and eco-friendly means of transport. I request to include a plan to facilitate the safety for the transportation by bicycle through the creation of exclusive lanes for cyclists in the Municipality of San Juan.*
- *With regard to solar energy, which is considered in the case of installation of light poles.”*

PRDOH Response: Thank you for your comments. The Social Interest Housing program, outlined in the Action Plan, aims to provide dignified, resilient housing for vulnerable populations, including the homeless. PRDOH will take these suggestions into consideration as programs are further developed.

Comment: #327_10-21-18_Zoraida Vega de Rodríguez (Esperanza Para la Vejez, Inc.)

“To Whom It May Concern, I am writing to encourage consideration, as part of a mixed-use neighborhood development plan, to include a place for the exchange of (reused) materials. All future neighborhoods should be designed with a community-based ReUse Center due to the multiplying benefits that occur when this type of infrastructure is in place. A huge contributor to resilient communities, ReUse Centers provide affordable materials to people who need them most, a convenient alternative to the landfill, a place to teach and preserve important skills, and they create quality jobs. Perhaps more importantly, they can not only be self-supporting financially once launched, they provide enormous assets and value to the community.

Material exchanges or ReUse Centers, in particular community-based ReUse Centers, are a powerful way to reduce waste and rebuild community. I am the Director of a nonprofit organization in Ithaca, NY, and have participated in EPA-funded disaster response training. Lack of reuse infrastructure is a universal problem, but please consider it in future planning. We offer a free online business plan template for any community who wants to start their own independent community reuse center: template.ithacareuse.org. I appreciate the opportunity to submit this comment.”

PRDOH Response: Thank you for your comments. PRDOH will take this into consideration during further development of programs outlined in the Action Plan.

Comment: #328_10-21-18_Annie Mayol (FPR)

“Foundation for Puerto Rico (FPR) appreciates the opportunity to present comments on Puerto Rico’s Action Plan for the Community Development Block Grant funds for Disaster Recovery allocated by the Supplemental Appropriations for Disaster Relief Requirements, authorized by Public Law 115-56 and Public Law 115-72 2017. Foundation for Puerto Rico is beholden of being recognized in the Action Plan, “as one of the multitudes of civic stakeholders have played key roles in the immediate recovery efforts”. FPR is a 501(c)(3) local non-profit organization whose mission is to transform Puerto Rico through social and economic sustainable development.

Below are FPR comments to the latest amendments of the Action Plan.

Planning Programs

a) *Planning Coordination (Page 111)*

As part of the work of updating, reformatting, and improving the Hazard Mitigation Local plans community stakeholders should have the opportunity, including NGOs and Businesses, to engage in the development of the plan. The approval of the plan should require evidence of local stakeholder engagement in the planning process. The Hazard Mitigation Plan should also include a municipal government capacity assessment to align the plan with local needs.

b) *Whole Community Resiliency Plan (Page 113)*

Foundation for Puerto Rico recommends that the definition of a vulnerable community be framed by the vulnerability and resilience community profiles to be developed by the administering entities, which will incorporate hazard data (flood, hurricane, landslide and others) and exposure data (asset data, concentrated damage, census data, infrastructure data, health, education, economic revitalization, environment and others). A broader definition based on data available, will provide accurate representations of community vulnerability. Moving beyond traditional definitions of vulnerability and resiliency will reflect the actual needs of the community over the long term.

Comments on Eligibility Criteria

For the eligible criteria, the scope of what is reimbursable should be tied to the program guidelines, which define reimbursable activities as documented of staff time related to data validation and analysis around vulnerability and resiliency profiles developed in the initial phase.

Program Description (Page 114)

The identification of high-risk areas should utilize the vulnerability and resilience community profiles developed by the administering entities, which will incorporate hazard data (flood, hurricane, landslide and others) and exposure data (asset data, concentrated damage, census data, infrastructure data, health, education, economic revitalization, environment and others). These profiles can then be used to create an Online Dashboard to guide future local, regional and island-wide planning, recovery, mitigation and resilience efforts.

For Phase 2, the plans should be based upon the community vulnerability profiles that will be developed as part of Phase 1. These vulnerability profiles will encompass a broader definition of hazards that a community may face before, during, and after an emergency. Moreover, final plans should be based on data obtained from the vulnerability and resilience community profiles developed in the initial phase.

Economic Recovery Programs

a) *Small Business Financing (Page 154)*

Introduction (Page 169)

The DDEC should add to its commercial sector considerations the tech industry, as a separate core sector. The tech sector will allow the island to count with a global market of purchasers, it brings such importance that it needs to be considered individually.

Eligibility (Page 171)

All estimates included in the businesses' recovery plans submitted by eligible companies should be measured on a quantitative base tied to qualitative assumptions, for example all forecasts should include assumptions based on market or historical experience. This also applies to page 174 under the section of Eligibility in relation to its 5th bullet point.

Distribution Method (Page 171 & 174)

FPR recommends adding to the process of method of distribution, besides the Governmental Bank of PR and DDEC, a Request For Proposal "RFP" that includes but is not limited to other financial institutions like cooperatives and non-profit organizations to ensure the participation of additional key sectors that are closer to the communities and have more reach outside of the traditional metropolitan area. These key players should be considered as having a very important role in the development of the island's economy and seen as a support for DDEC.

c) Workforce Training Programs (Page 160)

Eligibility

FPR recommends increasing to \$10,000,000 the amount of funds that can be administered through units of local government, non-profit organizations, and governmental and quasi-governmental agencies who will be invited to propose workforce training programs. Organizations that operate closer to the communities are familiar with the needs of local job markets and agile in the development of specialize training suitable for the particular market.

General Comments

Overall recommendation for Economy Recovery Programs: there needs to be an active and immediate plan in order to assure the timeliness of funds allocated to small businesses is accomplished. It should also include that the loans under this action plan are a chance for companies to improve their business credit and be able to have in the future more access to capital options in the future. All business economy recovery plans presented by eligible participants should be quantitative and qualitative drafted, prepared with market estimate assumptions and/or historical data. Funds received to create jobs or to keep active jobs should pay the employees at market value opportunity."

PRDOH Response: Thank you for your comment. The Action Plan has been updated to incorporate feedback received during the comment period. PRDOH values the partnership of Foundation for Puerto Rico and looks forward to an ongoing positive working relationship with the Foundation.

Comment: #329_10-21-18_Anisabel Santiago (Hotel Hacienda El Jibarito)

"The proposal submitted is for development of a hotel for those impacted by Hurricanes Irma and Maria. The project proposal is below:

"Project Brief

The projects consist of the renovation of the three-story building with a total of 28 units divided up into 17 rooms and 11 villas. The rooms have a bathroom, air conditioning, cable TV, and a

coffeemaker. The villas have a bathroom, air conditioning, cable TV, a small lounge with a coffeemaker, refrigerator, microwave, and a balcony with a hammock. The coffee house, activity rooms, restaurant, and pool bar will be renovated. Among the improvements during the renovation, eco-friendly equipment is being considered.

A three-story building will be added providing 30 new rooms with a mountain view. A terrace in the forest shall be provided for “glamping” in order to encourage the enjoyment of green spaces, a water recreation area with a spa will be created for family recreation and open market will be developed to contribute to the economy of the local farmers and artisans.

This Project will renovate administrative areas located inside the building. In addition, green spaces and a garden will be rehabilitated for recreation and enjoyment by tourists. The buildings will have generators, water tanks, automated rooms, laundry rooms, access control, improved parking areas that include bicycle parking, a water recollection system, water treatment, and solar panels, amongst other features.

The building, common spaces, recreational facilities, and villas are designed to meet the requirements, norms, laws and local ordinances, particularly the accessibility standards of the Americans with Disabilities Act (ADA) and the Uniform Federal Accessibility Standard (UFAS).

SERVICES

The following services will be provided to tourists in the project:

Rooms, villas, restaurants, game rooms, water recreation area, spa, glamping, marketplace, coffeehouse, coffee-growing experience, convention center, activity rooms, a waterfall trail.

Additional services will be provided in coordination with the Project Manager.

DEVELOPMENT

Hacienda El Jibarito is a proposed acquisition, renovation, and development project that will have an estimated cost of \$19.5M. They request an allocation of funds from the CDBG-DR of \$15.5M and another \$4M of funds through the Opportunity Zones Resources Center. The development and operation of this project involves an integration of different government programs combined with the private sector generating around 300 direct and indirect jobs during the renovation phase and approximately 75 jobs during the operational phase. The acquisition and renovation of the Project will have a duration of about 18 months beginning in June 2019 and finishing in January 2020.

This project has renewable energy certifications, as well as green project certification. The project also meets all parameters required by planning regulations and all local, state, and federal requirements. Hotel Hacienda El Jibarito is already a viable complex, appropriate and optimal for the needs of tourists that visit and fits with economic development plan of the municipality. Furthermore, this project complements the efforts of the local and state governments to offer families a unique tourist experience.”

PRDOH Response: Thank you for your comment. The Multi-Family Rehabilitation, Reconstruction and Resilience program provides funding for multi-family housing developments. Large transformative projects which create jobs and/or cascading economic

impacts may be eligible for funding under the Economic Investment Portfolio for Growth program. Currently available information regarding these programs is available in the Action Plan.

Comment: #330_10-21-18_Roberto José Thomas Ramírez (Iniciativa de Ecodesarrollo de Bahía de Jobos)

“The Ecodevelopment initiative of La Bahía de Jobos (IDEBAJO) is a community-based nonprofit organization registered under the laws of Free-Associated State of Puerto Rico since 2010. IDEBAJO is composed of various community-based organizations, citizens, and socio-productive projects that seek as a whole to serve to facilitate community organization and development and serve as a planning entity at the regional level in an endogenous and local manner. Its scope comprises of the southeast of the country, in particular the municipalities of Salinas, Guayama, and Arroyo. Among its objectives are to protect and develop, using principles of sustainability, the natural environment and the historic and cultural heritage of the region, generating local economic activity, and to make progress on the transformation of the reality of poverty, exclusion, marginalization, and social, economic, and environmental injustice in the area.

As part of the organizations and communities affected in the wake of Hurricane Maria and that have worked to streamline the recovery process and to attend to the needs that worsened after the landfall, we find it necessary to express and address the problems, challenges, necessities, dangers, and potential impact in the area depending on the use, management, transparency, participation, and effective intervention from the community base in the area with respect to the plan for use of CDBG-DR funds.

Required actions: Address the lack of participation, transparency, and bureaucratization of the action plan process with wide calls through diverse mediums of communication, create spaces for participation and planning from the communities, structures, and alliances that already exist in the community environment of the country.

First of all, to clarify that our communities were not informed nor included in the development of the plan for use of funds in the first allocation, and we have found out about this new process by being part of a coalition of organizers and communities under the Community Participation Workshop (Jornada de Participación Comunitaria), facilitated by the organization Legal Help Puerto Rico (Ayuda Legal Puerto Rico). The information dissemination has not been the most adequate for a country where more than 30% of the population does not have access to the internet.”

PRDOH Response: The public hearing process was open to the public and resulted in a wealth of information exchanged. Hundreds of submittals from the public were received. Although each proposal may not have been referred to by name in the Action Plan, all submittals have been reviewed carefully by PRDOH and were considered in the development of the plan. Notification of public hearings was advertised on social media, in the newspaper, and in circulated newsletters, in addition to being posted on the PRDOH website, www.cdbg-dr.pr.gov.

“Required actions: To work with community organizations and within communities to precisely identify the needs not by FEMA and poorly met by Tu Hogar Renace, and to be able to create an inventory of needs at hand of the communities that permits the development of plans from and for the communities.

Being close the area of the hurricane’s landfall, our homes and infrastructure were severely damaged leaving a great portion of our population even more vulnerable. The response from FEMA was inefficient, at the very least, denying more than 40% of the claims, expecting that the claims would be made through nearly inaccessible mechanisms for many of the communities, on average providing insufficient resources for what was necessary to attend to the needs of repair, soliciting documents not demanded in the United States, and ignoring many of the appeals. The government program Tu Hogar Renace not only did not serve to replace and mitigate this, but also in many cases was even more problematic leaving many families more vulnerable. The practice of overcharging, performing low-quality work, delays, and even damaging houses that weren’t affected by the hurricane not only is unfortunate but also demonstrates the appalling siphoning of funds and misuse of available resources to attend to basic needs. In this sense, it not only leaves hundreds of persons and homes to be attended to but also many more added problems for lack of or inadequate services from authorities. There are still many people with their houses completely or partially destroyed that are living in residences of family or friends, searching daily to see where they will sleep, or they have been forced to leave the country.”

PRDOH Response: Thank you for your comment. The purpose of CDBG-DR funding is to meet unmet needs resulting from a disaster. The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

“Required actions: That they open communities spaces for participation and planning, in cooperation with university institutions and preestablished partnerships (where they exist), that clearly identify categories of vulnerability, explore avenues of resolution and mitigation, and develop plans in which the right to remain, the participation, and consent of the communities is the fundamental basis of decision-making regardless of whatever “relocation” proposal.

At this time there are at least 6 communities in three municipalities in which IDEBAJO works with the possibility of being partially or totally displaced under the premise of being vulnerable communities without the possibility of mitigating said dangers. This comes from documents of proposed plans by municipal administrations and others from the government. In these documents they do not clarify the parameters for categorizing vulnerability nor exists any explanation of why there are no possible mitigation measures, and least of which they have not provided participatory processes for those that live in the mentioned communities to discuss and evaluate alternatives for this type of decision.

It is important that this entire process is carried out with the participation and decisions of the communities, and that they respect and search alternatives to mitigate or make decisions that reduce the risks, if they are real, and that there is no possibility of displacement without consent

as part of the recovery process. There are serious housing and infrastructure problems as well as with other services that can be resolved. We find it necessary to recognize and integrate community-created initiatives as guides for the recovery process.”

PRDOH Response: PRDOH agrees that planning works best when it is community driven and has designed programs such as the Whole Community Resilience Planning with those considerations in mind.

The Whole Community Resilience Planning program offers an opportunity for communities to create long-term plans for thoughtful and resilient community-wide recovery.

“Required actions: That they prioritize housing needs, that they gather information on the infrastructure needs from the community, and they work from and with the organizations and existing organizational structures (where they exist) to attend to and work towards the recovery efforts.

Among the identified needs and that they continue to identify, there are hundreds of homes that are still without attention and that do not meet the aspirations of a dignified residence; Homes, other structures, and land in disuse that should be put to the service of the communities, a need for sanitation infrastructure and other types that permit work with drainage systems and wastewater management, street lighting, communication lines, and transportation that impede and hinder free access and movement between communities, among other infrastructural problems that need to be addressed.”

PRDOH Response: Thank you for your comments. PRDOH agrees that meeting unmet housing needs is of the utmost importance, and for this reason, has included several housing programs in the Action Plan.

“Required actions: That the impacts and needs in the area of the community economic activities are inventoried and that specific programs are developed and designed from within the communities to permit greater capacity to mobilize and organize resources to strengthen communities and their resilience.

A considerable number of businesses, fisheries, small-scale farmers, and other community economic initiatives came out affected. The fisheries lost their docks, motors, vessels, and fishing gear. They suffered damages to equipment and installations for processing the catch, its sale, and other means of work. In addition, the workings between the Department of Agriculture and the fisheries have slowed down and become neglected. Small-scale farmers lost harvests, installation, infrastructure, processing equipment, and on top of that small animals, and feed amongst other things necessary for their work. The price increases on materials and other farm inputs have affected the operation of diverse economic activities in the communities.

The majority of plans presented lacked specific information that address the order of priorities of the CDBG-DR funds that are allocated for housing needs not previously met in the wake of Hurricane Maria, focused on the low- and medium-income persons. They allocate proportionally more resources for tourism projects and other economic activities and much less for other urgent infrastructure and housing needs. They do not adjust necessarily to the wishes and needs of the

community not only for lack of community participation but rather a focus on other measures that do not directly benefit the communities, nor do they address their immediate, unmet needs.

The centralization of the decision-making process, the lack of transparency, the contracting decisions for program administration, the lack of participation and community involvement generates distrust in the process and its effectiveness to attend to the needs of the communities. It does not seem to have specificity, clarity, nor enough information about what or which parameters and premises it assigns the funds, the credentials of the contractors to administer them, what processes that will be taken to meet the program objectives, among other concerns.”

PRDOH Response: As required by HUD, 70% of the overall CDBG-DR grant must be expended to benefit low- and moderate-income persons. An estimated percentage of funding spent for each program which will benefit low- and moderate-income persons is included in the overall budget table included in the Action Plan.

PRDOH is committed to leading a responsible and transparent recovery effort. As required by 83 FR 5844, PRDOH must post information related to its CDBG-DR Grant to its website for public consumption. Information including procurement policies, contracts, Quarterly Performance Reports (QPR), expenditures, program policies and procedures, and other related information will be posted to PRDOH’s disaster recovery website at www.cdbg-dr.pr.gov as it becomes available.

“Required actions: To take into consideration and base programs and allocations on the economic, social, and community projects and structures on existing organizational structures and initiatives (where there are) from and for the communities, like the projects and initiatives of IDEBAJO are, with a strong participation component and community planning that has the resources for training and development with community participatory design.

For years IDEBAJO has worked towards the development of initiatives, projects, and work plans that promote integral, local, endogenous development in social, economic, and cultural contexts. Before the hurricane, they had begun various projects that after the effects of Maria that have become even more important.

Among these projects is Construyendo Solidaridad desde el Amor y la Entrega, that after the passing of the hurricane has managed to repair or reconstruct around 9 homes with approximately \$75,000, the result of donations and managed under dynamics based on solidarity. In addition, it has created a skills development process for youth and other members of the communities in the area of construction, and it envisions itself has a community alternative for construction in the community that generates jobs and at the same time addressing housing issues. There is also Coquí Solar that intends to generate an alternative form of the management, production, improvement, and relief from conditions of environmental injustice in the region, developing a solar energy installation and collective administration project on suitable rooftops in the communities of the region. In this sense it is much more than an energy production project, awareness about conservation practices, an environmentally more responsible alternative that would improve health conditions, or economic activity in the communities. They have formed networks of community gardens, orchards, apiculture, and fishing that have generated food

sovereignty, access to healthy foods, and economic activity to produce inter-community distribution markets. They have developed community-based sustainable tourism projects managed by the communities that promote and contribute to environmental conservation, the preservation and development of the historical and cultural heritage of the region and to generate employment and economic development for the communities of the area, recovering and reviving the historic value of our communities.

In this sense we believe that the process of organization and development of existing community initiatives should be the principal piece of the planning and development of programs that identify urgent needs, facilitate the recovery from within the organized communities and their knowledge of their environment and needs, promote existing initiatives and permit the strengthening of the social and economic fabric from within their own communities, without the need of large intermediaries that erode the availability of funds.”

PRDOH Response: Thank you for your comments. PRDOH values the participation and input from community organizations. PRDOH looks forward to continued involvement of community organizations throughout the life of the grant.

Comment: #331_10-21-18_Carlos R. Ruiz Cortés (The Institute of Puerto Rican Culture)

“The Institute of Puerto Rican Culture appreciates the opportunity to present its comments on the draft of the disaster recovery action plan for the use of CDBG-DR funds in response to Hurricanes Irma and María. We will refer in our comments to Transformation and Innovation in the Wake of Devastation – An Economic and Disaster Recovery Plan for Puerto (henceforth COR3).

By decree law, The Institute of Puerto Rican Culture (ICP) is the government agency responsible for the implementation of public policies in relation to the development of the arts, the humanities, and the culture of Puerto Rico. For this purpose, it has among its roles and functions:

To conserve, safeguard, restore, and study moveable, immovable, tangible, and intangible assets for the better understanding of the cultural-historic heritage of the Puerto Rican people, and put this knowledge in reach of the people through various means of dissemination. ...

...To establish and administrate archives with the aim of the organization and conservation of public documents and manuscripts about the history of the country.

The conservation of these documents is not limited to the history of the territory, but also necessary elements for developing resilience on our island. For example, the ICP has maps and plans of historic areas, urban centers, monuments, among other things. Across the islands there are different archives that just like the ICP require digitalization. Accessibility to these documents is necessary to be able to use them when it is necessary in present times, as happens for example, with plans for historic buildings and maps of urban centers.

Resilience extends to the conservation of our established historical heritage and we must know how to protect the same utilizing the information that we have, and this can only be achieved if it is accessible. Currently, FEMA visits the General Archive of Puerto Rico to gather information about the buildings in which they find themselves working. The ICP proposes that the amounts located in the CDBG-DR action plan be included in the COR3. (Matching with COR3 on pg. 133:

NCR 1 – Historic and Cultural Properties and Collections Preservation; NCR 3 – General Archives Mitigation and Modernization). The ICP should lead the digitalization efforts of the archives in Puerto Rico and funds should be allocated for it, likewise, we should develop an online network, centralized within the ICP, that provides access to other digital archives on the island.

The information provided in the archives can be sustainable. For example, in Spain, researchers pay for the digitalization of historical books that are not yet digitalized and later they are provided at no cost digitally. Furthermore, there is information that for-profit companies acquire to provide historical data that should have to acquire these assets digitally.

It is the responsibility of every state government to protect, preserve, and promote its cultural and historical heritage. In our case, over 29,000 works of art, 18,500 archaeological artefacts as well as millions of other documents are in the custody of the state. We propose to build a series of harmoniously interconnected structures dedicated to the protection of cultural and historical heritage as outlined in the Central Recovery & Reconstruction Office - COR3 (NCR4 - Caribbean Cultural Collections Preservation, Research, and Safe Storage Center). This also promotes alternative tourism (alignment with COR 3: NCR 22 - Promote Alternative Tourism for Economic Development).

We propose a mitigation and new construction project. It addresses an urgent need that is the conservation of our heritage and serves areas in a low/medium income community that has problems of abandoned structures prone to evolve into public nuisances. It will be located in an accessible and highly passable place revitalizing the Rio Piedras/Hato Rey township area. It will attract economic development by serving as a preservation planning center, museum/library/archives services and private client collections. It will serve as a research center that will attract local as well as international academics and researchers. In turn, it will advance economic development by attracting tourism and generating jobs in the area (aligned with COR3 in action NCR 22 - Promote Alternative Tourism for Economic Development).

The structure would provide a workplace for over 250 employees and researchers. It would also help revitalize a residential and commercial area for low- and middle-income people who, at present, are suffering from sudden deterioration. The implementation of the project will result in the economic development of the region (primarily low- and middle-income) providing demand for the development of small businesses, resulting in an economic revitalization of the area where it will be located as well as those surrounding it.

This project has been developed with the collaboration and endorsement of the State Office of Historical Conservation, specifically with its Executive Director Carlos Rubio.

The Instituto de Cultura Puertorriqueña proposes that the actions NCR 2 (Arts Recovery) and ECN 12 (Provide Innovation and Entrepreneurial Training) of the COR3 be included in the Draft CDBG-DR, under the Workforce Training Program, Alignment with the Training Program (p. 179), and that it include the ICP. The same would apply under Small Business Incubators and Accelerators (p. 177 of the draft).

We propose to include under the Economic Recovery Planning section the following actions identified in the COR3: ECN 8 - Define and Develop Economic Development Zones (including cultural zones taking cultural assets into consideration).

Under the Home Repair, Reconstruction or Relocation Program (p. 141) it is indicated that PRDOH will work with the Office of Permit Management (OGPe) to establish an optimized permitting process for the disaster recovery program. It is imperative that funds be included to recruit additional staff for the State Office of Historic Preservation as well as for the ICP, thus ensuring that recovery activities related to repair and construction are not delayed. SHPO and ICP must ensure compliance with Section 106 and the National Historic Preservation Act of 1966 (Alignment with COR3: NCR12)."

PRDOH Response: Thank you for your comment. PRDOH is committed to compliance with applicable local and federal historic preservation laws and regulations. Large transformative projects which create jobs and/or cascading economic impacts may be eligible for funding under the Economic Investment Portfolio for Growth program. Currently available information regarding this program is available in the Action Plan.

Comment: #332_10-21-18_Gloriana Ydrach (Universidad del Sagrado Corazón)

"Universidad del Sagrado Corazón ("Sagrado") respectfully requests changes to various programs included in the Draft Amendment to Puerto Rico Disaster Recovery Action Plan for the Use of CDBG-DR Funds in Response to 2017 Hurricanes Irma and María (the "Action Plan"). Our recommendations aim to include the student population among those in need of affordable housing, insert the creative industry into the economic recovery and development of Puerto Rico and include educational institutions in urban centers as part of community recovery and revitalization efforts."

General Comments

"In general, we recommend the inclusion of the creative industries as part of the industries supported by the recommended programs in the Action Plan. Creative industries in Puerto Rico have a great untapped potential: they could promote the creation and retention of jobs, particularly for low- and middle-income families, could attract more tourism activity to Puerto Rico and spearhead the renovation of clusters located in urban centers, such as Santurce, eradicating the slum and blight that characterizes the Ponce de Leon Avenue corridor from Sagrado to Miramar.

Sagrado is developing the Nuestro Barrio Creative Industries Acceleration and Commercialization Program ("Nuestro Barrio"), a program designed to impact the Santurce neighborhood in San Juan. Santurce is the neighborhood with the highest population density in Puerto Rico. The city of San Juan is also the engine of economic development for the northern metropolitan area of Puerto Rico. According to the 2011-2015 estimates by the U.S. Census Bureau, the municipality consists of a population of 371,400.

Santurce is a vital urban settlement and the geographic center of the San Juan's metropolitan area which groups seven municipalities with a population of 1.25 million. It is also the urban setting of many governmental services, tourism destinations and hospitals. Santurce is composed of forty sub neighborhoods over 5.24 sq.mi. with 73,930 inhabitants with a density of 14,108 per sq. mile. Its population consists of 54% women and 46% men, 18% are persons with disabilities

and 3% are veterans, 33% are children under 6 years of age, 33% are children between 6 - 11 years of age, while 34% are children between 12 and 17 years of age.

The epicenter of *Nuestro Barrio* is located southwest of Santurce in the sub-neighborhood of *Sagrado Corazón* where *Universidad del Sagrado Corazón* is located. This neighborhood is a low-income area: 11.8% of its residents are unemployed and 44% are employed. However, 50.5% of the population is under the poverty level, a figure estimated in the last 12 months by the US Census. Also, 63.5% are single females head of households who have an income below the poverty level. The median income of the residents of Santurce is \$13,363 and the per capita family income is \$16,458. The area is full of dilapidated buildings that in many cases create public safety concerns. This bleak situation was aggravated by the passage of Hurricanes Irma and Maria (the “Hurricanes”). Please see Appendix A for additional information on the economic conditions and needs of the region.

Santurce has a geographical delimitation similar to a borough. It has the highest creative and cultural industries (ICs, in its Spanish acronym) density in Puerto Rico using the characteristics and indicators of the U.S. Economic Development Administration’s (“EDA”) cluster definition. According to the 2014 Survey of Creative Industries conducted by the Statistics Institute of Puerto Rico, San Juan has approximately 626 creative and cultural assets, and Puerto Rico has a total of 1,798. Santurce is home to a significant amount of industries, specialized infrastructure and high value resources for the creative economy metropolitan area as a platform for high value production and global exports.

Tourism represents 7.1% of GDP and employs 70,000. The creative industries are an important economic sector and value chain contributing to the generation of content, products, services and experiences for the visitor. Several studies have found that since 2013, the ICs contribute 3% to the PIB (Hernández, 2013, CODECU, 2015, IEPR, 2016). According to these studies, on average, each creative industry generates 4 jobs totaling more than 20,000 persons.

Santurce has an important number of creative strategic areas, assets and activities that include among others: two historical zones, *Miramar* and *Sagrado Corazón*; a Convention Center District, 15 hotels; *Nuestro Barrio* and other areas of renowned urban vibrancy such as, *Barrio Obrero*, *Borinquen Avenue*, *Loíza* and *Cerra Streets*. Santurce also has cultural centers such as the Center for Fine Arts, the *Pablo Casals Symphonic Hall*, the *Matienzo Theatre*, *Teatro Breve*, the *Puerto Rico Museum of Art*, and the *Museum of Contemporary Art*. Other cultural assets found in Santurce include several entertainment venues, including the *Metro Theatre* and the *Theatre of Fine Arts*, gastronomy venues, cafes, libraries, open-art venues and activities - including “*Los Muros Hablan*” and “*Santurce es Ley*” and creative and cultural activities.

Santurce's creative industries cluster has a robust telecommunications technology infrastructure. Easy access to high capacity optical fiber technology and ultramarine tele-communications has spurred the growth of creative industries and technology companies. This conglomerate composed of local and international industries has evolved rapidly over the past several years. This technological strength poses a competitive advantage and added value for the conglomeration of creative industries with potential synergies between the technological and creative sectors.

In addition to the educational offerings and technological and cultural attributes, Santurce has private initiatives focused on generating creative and entrepreneurial activities. Sagrado inaugurated the Center for Collaborative Innovation (“Neeuko”) in 2016, with the goal of promoting collaborative innovation via theory and practice, fostering and strengthening local entrepreneurial endeavors through educational offerings. As part of the initiative, Sagrado operates the Nuestro Barrio Cultural District project (“NBCD”). The goal of NBCD is to strengthen creative and cultural assets and the creative industries via the creation of a collective and representative plan that generates opportunities for sustainable development.

This initiative is funded by the National Endowment for the Arts (“NEA”) and is administered by Sagrado through Neeuko. Nuestro Barrio is a participatory project with a Steering Committee composed of 15 stakeholders from the creative industry clusters and organizations within the region. It is important to note that it also has representation from the Autonomous Municipality of San Juan, NGO's and private sector. At the same time the project is backed by the various departments, centers and programs at Sagrado.

Considering this context and ecosystem, Santurce has all the attributes and potential to become an innovation hub based on creative and cultural industries. The hub would create a cluster model focused on promoting the development of existing and new creative industries as an economic engine of the Santurce region, the municipality of San Juan and its metropolitan area.

Based on the foregoing, we recommend that the Action Plan include the development of the creative industries in clusters that would promote growth of the sector.

Nuestro Barrio received a \$2.4 million grant from the EDA that will assist in the initial implementation of the program, but with CDBG-DR funds the program could have a broader impact on housing, economic development and infrastructure.”

PRDOH Response: Thank you for the comments. Projects supporting arts and culture may be eligible for assistance under the City Revitalization program, which is outlined in the Action Plan.

Specific Comments

“Social Interest Housing Program (Homeless, Domestic Violence) – The Action Plan recommends an allocation of \$32.5 million to create housing for the special needs populations such as the homeless, senior citizens, domestic violence victims, persons living with HIV/AIDS, and individuals recovering from addiction, among other groups. (Page 134 of the Action Plan.) The program will request proposals from non-profit, non-governmental organizations for the development of social interest housing. We strongly agree with the principles of the Social Interest Housing Program and recommend that the program be extended to the student population, particularly students coming from low to moderate income families.

There is a great need for affordable housing for students in the Santurce area, and this initiative will also assist in the elimination of slums and blight and the development and rehabilitation of the area.

> Multi-family Reconstruction, Repair & Resilience Program – The program aims to “maintain and increase the availability of affordable multifamily units in communities across Puerto Rico,

reducing opportunities for slum and blight and consolidating investments in existing urban footprints.”(Page 146 of the Action Plan) In particular, the program seeks to serve Section 8 and elderly communities. Similar to our recommendation for the Social Interest Housing Program, we propose that the multi-family housing program also consider the needs for affordable housing of low to moderate income student communities, in particular in those areas surrounding educational centers such as Santurce and Sagrado. Multi-family housing is ideal for student and faculty communities as it maximizes land and resources and reduces urban sprawl.

City Revitalization Program - This program sets aside \$1.2 billion to allow municipalities, NGOs and non-profits “to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors to focus investment, reduce sprawls, and create a symbiotic environment to nurture complimentary investments from the private sector... The program contains a set-aside of \$100 million to prioritize strategic investments in growth nodes for redevelopment of urban areas in support of the University of Puerto Rico Rio Piedras and PR Mayaguez.”(Page 186 of the Action Plan). We agree with the principles of the program and suggest a clarification that the program is open a to NGOs and non-profits since some descriptions only make reference to municipalities.

In addition, we recommend that the \$100 million set aside for the redevelopment of urban areas in support to the UPR be increased and expanded to support also those non-profit universities located in urban centers, such as Sagrado in Santurce.

The damage caused by Hurricanes Irma and Maria to Puerto Rico’s housing stock, infrastructure and economic activities has unveiled the urgent need to use our creativity for the expansion in the housing inventory, growth promotion projects and infrastructure with developments that are resilient and cost effective. Our recommendations aim to include populations that have also suffered the effect of the Hurricane, among them the student populations and to add the creative industries into the mix to stimulate economic recovery and development. Finally, by including educational institutions in urban centers, the educational community will contribute to the effort needed to revitalize urban centers.”

PRDOH Response: Thank you for your comments. PRDOH has taken these suggestions into consideration.

Comment: #333_10-21-18_Wilfredo López Montañez (Junta comunitaria Sonadora en Acción del barrio Sonadora de Aguas Buenas)

“My name is Wilfredo López Montañez, community leader and spokesperson for the community board Sonadora en Acción in the Sonadora de Aguas Buenas neighborhood. I make these comments pointing out the great challenges of overcoming all the obstacles and barriers represented by the scourge of hurricanes Irma and Maria. The special demands and requirements and the limited process of participation and consultation that has been done to Puerto Rico and its citizens by the federal government has prevented the establishment of a more defined and clear strategy. For this action plan to be effective, it is necessary to ensure that the voice of the communities is taken into account, that we are given participation, that we are treated with sensitivity and respect, and that the disregard with which we are often treated is set aside. With

the proposed Plan of Action and the effort and commitment of citizens and their communities, it must contribute to a new country proposition. I believe that we are not making much progress if, at the end of all this investment of money, we do not leave a more stable and sustainable economy with lower levels of poverty and inequality. This requires attention to community economic development through projects that emerge from the communities and promote job creation, self-employment and other services from and for the community. In order for the Plan to be effective, it is essential that there be a comprehensive vision of all actions and recommendations. There should be monitoring processes with specific metrics and a methodology for the development of the plan. There must be a transparent audit subject to public scrutiny."

PRDOH Response: PRDOH agrees that planning works best when it is community driven and involves municipalities and the Planning Board and has designed programs such as the Whole Community Resilience Planning with those considerations in mind. PRDOH values input and participation from impacted residents throughout the life of the grant. Thank you for your comments.

Comment: #334_10-21-18_Lily

"Question: When it is a public building and suffered damage, private insurance paid but there are many unmet needs. Can I apply with you? I appreciate your help.

Clarification to question: The public building is leased to a private non-profit entity. The insurance of that private entity made a payment for the damages, but only partially covered the damages caused by hurricane María. Can I apply with you for this unmet needs fund? Thank you for your help."

PRDOH Response: There are many opportunities for non-profit entities to apply for or participate in programs outlined in the Action Plan. Please review the plan for information regarding opportunities for non-profits.

Comment: #335_10-21-18_José A. Santiago (Municipio de Comerío)

Summary: Hon. José A. Santiago, the mayor of Comerío, submitted a proposal that proposed activities to be funded under CDBG-DR for the following:

Housing:

- *Reconstruction of housing with resilient materials.*
- *Acquisition of 56 new housing units for families in need of relocation*

Infrastructure:

- *Improvements to the pluvial and drainage systems.*
- *Relocation of police stations outside of flood zones.*
- *Mitigation of landslides for highway 167 KM 7.1 to 7.3.*

- *Rehabilitation of hydroelectric plant for the production of renewable energy.*

Economic Recovery:

- *Relocation of medical and professional offices outside of flood zones.*

Planning:

- *Acquisitions of resilient materials and equipment for 10 central community centers.*

PRDOH Response: Programs outlined in the Action Plan are not geographically restricted within Puerto Rico. Residents of Comerío may be eligible to receive assistance. The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

PRDOH values a positive working relationship with municipios and looks forward to working with them to serve the people of Puerto Rico throughout the life cycle of the recovery process. Thank you for your comment.

Comment: #336_10-21-18_Llenin Figueroa (UPR Mayaguez)

"I. As university students, we denounce and repudiate..."

This document gathers the comments of multiple constituents of the University of Puerto Rico (UPR), the main public higher education institution in the country, to the amendments made to the Action Plan for Disaster Recovery Draft: for the use of CDBG-DR funds in response to hurricanes Irma and Maria (2017) (Draft Plan), subscribed by the Government of Puerto Rico, but mainly commissioned to Horne LLP, a U.S. advisory firm. RAND Corporation, a U.S. think tank that originated in the armed forces, also participated in the design of the Draft Plan. The constituents of the UPR that signed this document conceived our work as a country work because the UPR is due to the country. Puerto Rico entrusts us, by virtue of its centennial investment in the UPR, to rigorously and qualitatively educate its youth in a way that contributes to the country's sustainability and that we work for the well-being of all Puerto Ricans. Therefore, it is our professional, social and ethical duty to actively participate in everything that affects, on a large scale, the lives of all Puerto Ricans.

Today, as is well known, Puerto Rico lives under the designs of the Fiscal Control Board, which imposes serious cuts on all public goods - including our University - with tragic consequences for the great majority of the country. At the same time, we continue to face devastation after the passage of the hurricanes of 2017 and the widely documented atrocious handling of that catastrophe by the state and federal governments. Faced with the current situation, there are very few instances that have effects on a larger scale in Puerto Rico than the use, distribution and

oversight of the \$19 billion dollars of the Community Development Block Grant - Disaster Recovery (CDBG-DR) allocated to the PRDOH. In spite of this, throughout the recent months of hard citizen and community battles, including in the courts, to make possible some level of real citizen participation in this process, the vast majority of university students have not even been notified, summoned or invited to participate in any phase of the process of design or dissemination of the Action Plan for the use of CDBG-DR funds.

The valuable resources of the UPR System, with its broad and multidisciplinary expertise, could have contributed to the coordination and citizen conceptualization of the Draft Plan in a much more cost-efficient way, close to the Puerto Rican reality and in close and reciprocal connection with the multiple communities that we serve through numerous community programs and initiatives. The seriousness of the lack of transparency and the simulation of citizen participation is such that the university students have not even been part of the dissemination of the Draft Plan as it was conceived, nor of the arduously fought celebration of Public Views, a surprising matter, because the UPR has a captive community of about 65,000 people -not including their former students- who would have known the process by just sending a massive email from the Central Administration of the UPR.

Therefore, the university students who signed this document denounce and repudiate:

- a. the crass obfuscation of a process that will determine the lives and futures of hundreds of thousands of Puerto Ricans;*
- b. the impediments designed so that we could not influence the process from the beginning, contributing our skills, experiences and expertise;*
- c. the complicity of the current administration of the UPR with this lack of transparency and participation, as well as with the distribution and management of funds without supervision or controls that is derived from the Draft Plan.*

The complicity of the current administration of the UPR (both in Central Administration and at the Campus level) becomes apparent when examining the Draft Plan. In the document, the UPR appears as administrator of the "Home Resilience Innovation Competition" Program (pp. 137-138), under "Planning Programs," with an award of \$5,750,000. However, at no time were the constituents of the UPR notified of the process followed to make this determination. Nor do we know (nor it is indicated in the Draft Plan) how this Program will be managed, who in the UPR will handle the funds granted and how they will do it, nor what will be the mechanisms for oversight of its use by the university students and citizens. Similarly, the constituents of the UPR were not consulted as to the capacities of the institution to carry out even larger programs. A figure of \$5.7 million awarded to the UPR out of a total of approximately \$19 billion is not reasonable considering the plethora of knowledge and skills that the UPR System brings together."

PRDOH Response: The public comment process regarding this Action Plan was thorough and included a public hearing process that was open to the public and resulted in a wealth of information exchanged. Hundreds of submittals from the public were received. Although each proposal may not have been referred to by name in the Action Plan, all submittals have been reviewed carefully by PRDOH and were considered in the development of the plan.

Notification of public hearings was advertised on social media, in the newspaper, and in circulated newsletters, in addition to being posted on the PRDOH website, www.cdbg-dr.pr.gov.

UPR has been an active partner in the development and design of the Home Resilience Innovation Competition. PRDOH values the partnership of the University and looks forward to a continued productive and positive working relationship with UPR.

"On the other hand, in one of the sections added as part of the amendments to the Draft Plan, entitled "Multisector Initiatives", it is stated that the "City Revitalization Program" (pp. 205-207) will have the PRDOH as administrator and the Rio Piedras and Mayagüez Campuses as some (among several others unidentified and some identified, such as Para la Naturaleza) of their sub-recipients, but the information in this regard is absolutely vague (p. 207):

This program has a \$100,000,000 reserve to prioritize strategic growth investments for the redevelopment of urban areas in support of the University of Puerto Rico, Rio Piedras and Mayagüez campuses. Students have suffered significant physical and economic stress due to the impact of hurricanes. These investments will not replace government investments in the university system, but will create an environment conducive to economic regeneration around campuses so that students can return to study in safe areas and with a vibrant economy. (p. 207)

Of course, as university students, we have experienced and continue to experience first-hand the "physical and economic overload" of our students, but this is not dealt with by "safe areas" that we do not even know what they mean and whose funding we will not have a way of controlling. The most significant reason for the "overload" of our students is the result of the austerity measures imposed on the University. These imply cuts in services and academic offerings to our students, while the only thing that increases are their study costs, in such a way that an indeterminate number of qualified students were left out of the UPR this academic year and thousands more have had to request extensions to their tuition payment with the recurring uncertainty of whether or not they will be able to pay them by December.

Finally, the university students who signed this document denounce and repudiate that the Government of Puerto Rico has not made public all the citizen comments (both those presented in Public Views and those sent via digital), as indicated in the Draft Plan that will be made in the form of appendices published on the website of the PRDOH. We hereby certify that those appendices were requested via electronic mail and we haven't received any answer. The comments that we could access by our fellow citizens have been revealed by the ones who prepared them. From the perspective of the UPR members, we indicate that the only comments subjected to the sole initiative of the UPR constituents, which can be referred from the Draft Action Plan are the ones from UPR-Ponce (indicated on p.213), but these, and everything else, are out of our reach and the rest of the citizenship."

PRDOH Response: All public comment received regarding the substantial amendment to the Action Plan is memorialized and responded to in the final draft version of the plan, submitted to HUD. The Plan, including responses to all public comment is publicly available in Spanish and English at www.cdbg-dr.pr.gov.

Further information regarding multi-sectoral initiatives will be published to the same website as part of program guidelines, after HUD approves the programs.

“As male and female undergraduates, we analyze the Draft Action Plan and we found...

On the other hand, the plain disconnection that the Draft Action Plan has with the reality of the country is shown when the data obtained in the first part of the document on demographic, economic and housing impacts do not follow the guidelines for conceptualization, implementation and auditing of the already designed programs that are in the second part of the document.

From the description of the programs, it is not shown how its design deals as a priority treatment with the vulnerabilities identified on the first part - all of which are increased after María - to reduce the poverty and inequality breach of the country.

Below, we offer three examples.

Child’s poverty, education and unemployment

The Draft Plan identifies the astonishing numbers for child’s poverty in the country and some of their consequences:

Child’s poverty is a great concern for Puerto Rico that should be contained as part of the recovery effort. When hurricanes Irma and Maria crashed into the island, the child’s poverty rate has already been on 56%. Over time, economic challenges caused by the conditions after the hurricane could take to a rise of this rate. Unless it is reduced by effective recovery programs, child’s poverty has dangerous consequences not only for Puerto Rico future, but for the whole American society. Children who live in poverty have less opportunities to finish school, suffer more health problems with less access to medical attention, and tend to maintain a low economical level, as they earn lower salaries when they are adults.

According to the Youth Development Institute in Puerto Rico, six (6) out of 10 (10) children in Puerto Rico live in poverty. This sheds a particular light to social vulnerabilities that Puerto Rico communities in recovery face. (pp. 40-41)

At the same time, schools closure continue, education is privatized and UPR.4 is dismantled. Nothing in the Draft Action Plan pays attention to accessible public education as the main documented tool to close the gap for child’s poverty. In fact, it points out schools’ closure as a done deal and it pretends us to believe that those closures started after the migration caused by Maria:

As a response to emigration and lack of funds to maintain school systems working Puerto Rico government announced that 283 schools will be closed because of low enrollment; Education Department informed that there are 38,700 students less than in May 2017 and that nearly 50% of the schools only occupy 60% of their capacity. Some short time effects can be: teachers who have to look for other schools and the logistic related to student’s transport to open schools, located mainly in San Juan, Ponce, Mayagüez and Aguadilla areas. (pp. 98-99)

To secure the UPR in a leading role as tool for social transportation and decent professional aspirations is not a priority either, since the members of this institution do not participate in the

CDBG-DR funds allocation process. We ask ourselves how the Puerto Rico government and the federal government, as well as think tanks and private corporations that benefit from the grievance of a country, can reverse the poverty, unemployment and lack of education statistics ...”

Poverty, unemployment and gender

Another significant case of the gap between need and solution in Puerto Rico, refers to poverty distribution and unemployment by gender. Some of the deepest inequalities that women in Puerto Rico face are: “Working women earn comparatively almost \$3,000 less than men, being the average income for women \$11,262 and \$14,190 for men” (p. 33); “Suppliers of continuous care have informed the need of more transition houses and more permanent houses for women and children, and emergency refuges for domestic violence victims” (p.42); “Generally, homes with small children show less marriages and an increase in mono parental homes, with a majority of women as chief of family” (p. 47). However, nothing in the Draft Action Plan is designed from that perspective, so those inequities could be minimized. There are not programs which acknowledge domestic work as a job, therefore, a paid job; there are not support groups where to enlist poor and vulnerable women to work outside the domestic sphere; there are not support programs for childcare; neither there is any program focused on fighting gender violence that affects directly Puerto Rico ability to recover.

Ecological principle

Finally, the urgent and comprehensive ecological principle, that should be the one and only criteria for the recovery and building efforts of a sustainable and vibrant country, is absent from the Action Draft Plan. Why isn't this Action Draft Plan designed by the communities and local experts who know and have managed clean sources of energy and usage of renewable resources in response to Puerto Rican climate and cultural realities? There are plenty of examples: Casa Pueblo, IDEBAJO, the Puerterriqueño and solar houses design (UPR-Mayagüez) and the Architecture School (UPR-Rio Piedras) work for sustainable designing of houses, among others.

PRDOH Response: As required by HUD, 70% of the overall CDBG-DR grant must be expended to benefit low- and moderate-income persons. An estimated percentage of funding spent for each program which will benefit low- and moderate-income persons is included in the overall budget table included in the Action Plan. Program implementation will be conducted in a manner which will not cause discrimination on the basis of race, color, religion, sex, disability, familial status, or national origin.

The draft Action Plan was informed by consultation with hundreds of stakeholders. PRDOH values the collaboration and expertise offered by local groups and values a continued working relationship with them throughout the life of the recovery.

“As male and female undergraduates, we ask..

How can we believe that this Draft Action Plan follow, in general terms, encourage local economy, if since its own preparation has been a marketable product for a private corporation benefit? How can we believe that if in the months elapsed after Maria the majority of the hiring for recovery has been to corporations and private American companies? As Ayuda Legal has reported, there is nothing in the Draft Action Plan that secures general participation of the citizenship to safeguard,

deliver and use of the funds in a fair and honest way giving priority to local companies. We have already seen that in the funds allocation and implementation, there is not a glimpse of answering to the social vulnerabilities that we suffer.

Is all of this a clear, integral and open citizenship participation in the design of the “recovery” that will mark us drastically in a foreseen future?

Clearly, we ask a rhetorical question.

Puerto Rican males and females, who inside and outside the archipelago, have been fighting for a better Puerto Rico, making proposals and taking actions for building it, we didn't need the upcoming of a hurricane to know that we needed to change if we want a better future. The sudden media obsession for “Se levanta”, “Construimos” and “Build back Better”, that after Maria the local government and private interest have shown, are a cause of alarm for every standing Puerto Rican. We don't have to allow businesses being done with our grievance, our lacks, our today and our tomorrow.”

PRDOH Response: Thank you for your comment. PRDOH seeks to maximize local contractor and business participation and job creation in the CDBG-DR programs to every extent feasible while also complying with HUD Section 3 requirements and procurement requirements as outlined in 2 CFR 200. Additionally, the programs outlined in the economic recovery section offer a comprehensive set of entry points for local businesses and workers, ranging from accelerators and incubators to small business financing and revolving loans. The PRDOH Section 3 plan will incorporate goals for all contracted firms for local hiring of business and individuals. Job creation will be tracked and reported for all applicable programs.

PRDOH's Citizen Participation Plan can be found at www.cdbg-dr.pr.gov.

Comment: #337_10-21-18_Hector Morales (La Cooperativa de Desarrollo Urbano y Vivienda)

Summary: The proposal submitted outlines DUVICoop has fulfilled all the requirements imposed by the General Law of Cooperative Societies, Law 239-2004, as amended and outlines some of the purposes of the organization, including educational workshops and job creation. The proposal also offers the following specific commentary on the Action Plan.

“We wish to make the following comments to the Recovery Action Plan facing disasters in the using of the funds CDBG-DR.

1. Workforce Training Program (Page 179) - In the first place, our comment is that the assigned funds are too limited to the working need and their impact in Puerto Rico. As an example, we mention that an approximate 60-hour educational training course is between \$1,200 to \$1,500 per student. Assuming the lowest number and using the total of the assigned funds to these courses, this means that the fund that are not used for the program administration, it could only reach 16,666 people. It is our opinion that the desired impact should be reevaluated and more funds should be assigned, so at least 40,000 people can be reached, which will represent the need of \$48,000,000.00.

2. From a quick reading, this program seems to be limited to the construction and hospitality industries. However, on page 182, the health sector is mentioned. The suggestion is for being as broad as possible. When we talk about construction, it seems to be limited only to workforce technical programs and we have to consider that the construction industry needs staff trained in other areas such as: construction management, supervision, cost estimator, accountancy, buyers, map reading, surveying technicians, roof sealers. They don't even mention the stages previous to construction, which are vital for a construction project, as planning and design. This segment requires trained staff as draftsmen, engineering technicians, permit analysts, among others.

3. As for hospitality, it is advisable to speak about the tourism industry. It is not clear if gastronomy is included in hospitality. Tourism is a broader term and it can be expanded to many other areas needed for the economic development of Puerto Rico."

PRDOH Response: Thank you for your comments. PRDOH has taken these into consideration.

Comment: #338_10-21-18_Rafael A. Caballero (Universidad Metropolitana)

"...At the Institute for Environmental Education (INEDA, Spanish acronym) / Atlantic OSHA Training Center (AOTC) we are dedicated to training in environmental, safety and occupational health matters. The Atlantic OSHA Training Center is the only OSHA authorized Training Center in the Caribbean. We can contribute to training workers (government and private), non-governmental organizations, communities and volunteers in different areas mentioned in the Recovery Action Plan Draft document and others that could be included. Developing a local workforce will help in achieving very necessary development for the local economy. This will lessen the need to bring resources from elsewhere and maximize the use of funds. The current phase that Puerto Rico is in is the ideal moment for bringing our workforce to a new level.

We respectfully provide our comments about the Action Plan Draft:

1. Building back better (page 19)

a. Develop a workforce with the "know how" to:

i. implement construction methods mentioned like energy efficiency, healthy indoor air quality, sustainability and mold resistance will be fundamental for the rehabilitation, reconstruction and for new constructions.

ii. Incorporating principles of the Healthy Housing Initiative of the Department of Health and Human Services (HHS) will allow to achieve efficient, sustainable, resilient and healthy environments for the citizens.

ii. Incorporating green building practices and standards (like LEED, Energy Star, WaterSense and others) will help achieve economic/environmental sustainability and improve resiliency.

2. FEMA STEP "Tu Hogar Renace" (page 56)

a. Providing health and safety training for contractors participating under this initiative as well as citizens. Training will contribute to providing safer and healthier environments both for workers and inhabitants.

3. Whole Community Resilience Planning (page 113)

a. Training targeting mold, lead and asbestos removal projects.

b. Training focusing on food safety, animal and mosquito-borne disease prevention in communities.

i. Also, build capacity in communities, government agencies and organizations involved in different aspects of emergency response.

c. Providing health and safety training within communities, state and municipal government agencies, NGOs and volunteers.

d. Increase the number of OSHA authorized trainers (train the trainer) in relation to health and safety for disaster site workers. Training can impact emergency response personnel, contractors or companies involved in different functions at disaster sites (response, debris removal, and others).

e. There are thousands of CERT (Community Emergency Response Team) trained citizens and more are needed. Providing OSHA disaster site worker training to many of these citizens will increase their health and safety while responding to emergencies within their communities. This would complement the training received under the CERT program. Although OSHA training is focused on workers, CERT volunteers and other volunteers could potentially face the same hazards during emergencies. Therefore, training can lessen exposure to certain risks and hazards.

i. Stimulating the creation and follow up of organized CERT groups and to have them working in close coordination with their municipal emergency management agency will help lighten the work load of professional responders.

4. Economic Recovery Planning (page 116), Workforce Training Program (page 161 and 163)

a. Include OSHA health and safety training as part of the workforce development (construction, general industry, maritime). Also, provide this type of training to NGO members and volunteers since they could face similar hazards while working in construction projects.

b. Community health workers and volunteers in this area need training as well. There are several health threats that can increase when disasters occur. Avoiding certain health issues during emergencies can help achieve maintaining public health and lessen complications in response and recovery.

c. Train workers to become technical experts involved in green building, energy/water efficiency, lead, asbestos, mold remediation and others.

5. Emergency responder resiliency training and support for these workers and their families

a. Increasing the emotional resiliency support and training for emergency responders and their families.

i. *These workers faced great physical and emotional challenges while working long hours during long periods in the aftermath of the Hurricanes. Many of them are still coping with the experiences they had while working in the disaster response.*

ii. *Providing training and support to the families of responders can help them in managing the normal challenges that occur during disasters, but also help themselves during disasters. If a responder's family is not well prepared to face the absence of that family member, it can impact the performance of the responder during an emergency.*

We look forward to continue being part of the recovery of our beloved Puerto Rico.”

PRDOH Response: Thank you for your comments. PRDOH appreciates the importance of health and safety in activities undertaken as part of the recovery effort. PRDOH has taken these suggestions into consideration.

Comment: #339_10-21-18_Amerisa Juarbe (Habitat for Humanity)

“Habitat for Humanity is developing a program called "Women Build" and it focuses on capacitating women to build homes and prospectively, they could get a job in the construction sector in Puerto Rico. These women would not be building their own homes to live in, just homes in general for those in need (Habitat for Humanity's mission). Since it is a program designed for women, would there be a possibility for funding this project?”

PRDOH Response: Thank you for your input, this is helpful as we continue program design. Included in the Action Plan is a workforce development initiative under the economic recovery programs, which may be of interest. Across the CDBG-DR portfolio, program implementation will be conducted in a manner which will not cause discrimination on the basis of race, color, religion, sex, disability, familial status, or national origin.

Comment: #340_10-21-18_PJ Wilson (Solar + Energy Storage Association of Puerto Rico)

Summary: The Solar Energy Storage Association of Puerto Rico (SESA-PR) provided background information on their organization, as a group representing private sector sustainable energy companies, and made a number of recommendations around PRDOH CDBG-DR programs. Comments reflected an appreciation for the inclusion of renewable energy, but highlighted that significantly more investment in this area is needed. Specific commentary regarding the Action Plan is as follows:

“GENERAL FEEDBACK

While the first tranche of \$1.5 billion didn't include support for the deployment of solar and storage systems, we're pleased to see that this current tranche of \$8.2 billion includes support for such systems in a variety of different programs within the plan. However, while the scale of funds provided for solar + storage is substantial, it's not in the ballpark of what's needed to support the rapid deployment of energy resilient systems for critical infrastructure, homes and businesses across the island in order to adequately prepare for the effects of the next hurricane.

Although funds are certainly justified for rebuilding, relocation, planning and the variety of projects included in the draft plan, it should be acknowledged that the majority of the financial damage caused, directly and indirectly, by hurricane Maria was due to the 100% power outage that spanned many months for much of the island. Lack of electricity was the main underlying problem that caused most of the financial damage necessitating federal assistance.

The technology of solar power with battery storage is readily available, and the workforce is poised to expand. Barriers to rapid deployment include the upfront cost of such systems, and the availability of financing mechanisms to make purchasing resilient solar and storage systems accessible to all. P. 73 of the draft plan frames the problem well:

“Power restoration has been hampered due to the sheer scale and complexity of the damage. Much of the island’s 2,400 miles of transmission lines, 30,000 miles of distribution lines and 342 substations were severely damaged in the storm.”

If a hurricane of the same magnitude as Maria hit Puerto Rico a year from today, or 5 years from today, the effect on the island-wide power grid would be the same: Large transmission lines would be damaged or destroyed, as well as distribution lines, substations, transformers and other equipment associated with Puerto Rico’s power grid. What would make the biggest difference in avoiding displacement and loss of life would be keeping the lights on in homes, businesses and critical facilities across the island. This is acknowledged in the formal report recently released by the Rocky Mountain Institute and the Institute for Competitiveness and Sustainable Economy, which includes a recommendation that at least \$5 billion, or ideally at least 50% of all CDBG funds be dedicated to incentive and financing mechanisms for solar and storage systems.

As an endorser of this report, SESA supports this recommendation and urges HUD and PRDOH to consider an overall allocation of the majority of CDBG funds to support the #1 solution to the majority of the damaged caused by Hurricanes Irma & Maria: facilitating the widespread deployment of resilient solar and storage solutions across the island. Funding at this scale would also be in line with the admirable and aggressive goals for renewable energy established by PREPA itself, the only electric utility on the island. The agency has recently announced its goal of 40% renewable energy by 20232, which would represent up to a \$15 billion investment in new renewable energy projects. The lynchpin to making this happen could very well be CDBG grants, and CDBG-supported financing mechanisms opening up more private capital. Although the draft plan includes substantial funding for solar + storage projects, we recommend reconsidering and increasing the scale of investment considerably, including more specificity in program design, and including solar and storage solutions in additional sectors of the draft plan, as detailed in these comments.”

PRDOH Response: Thank you for the comment. PRDOH agrees that sustainable, renewable energy sources are an important part of the recovery effort. Federal Register Notices, which govern the CDBG-DR allocations for Puerto Rico, stipulate the funding be used to primarily address housing needs.

“SPECIFIC FEEDBACK ON THE DRAFT PLAN

SESA of Puerto Rico recommends the following changes to the draft plan:

1 – LMI % REQUIREMENT

The table on P. 109 of the Draft Plan lists the “Community Energy and Water Resilience Installations” program as having a requirement of 100% of funds being allocated to Low & Moderate Income residents. There are a number of reasons to revisit this % requirement, and consider either a much lower % threshold, or an alternative means of calculating this aspect of the program. First, displacement due to lack of electricity impacted non-LMI residents and LMI residents alike. Although LMI residents may very well need a higher level of support, CDBG funds provide a unique opportunity to support solar + storage solutions for the entire island. Next, community installations supported by this program could very well include a mix of LMI and non-LMI residents. A 100% LMI requirement could unnecessarily restrict funding from supporting many community solar installations. Many businesses that could be supported by this program might not be owned by LMI individuals, but could be servicing an important part of the LMI population.

There are two different approaches that could address this issue. One is simply lowering the LMI requirement to a lower number, such as 70%, which would give PRDOH the flexibility to take these factors into consideration during final program design. Another approach could be to model the LMI requirement for this program after the “CDBG-DR GAP TO LOW INCOME HOUSING TAX CREDITS (LIHTC)” program, which states on P. 139 “All projects must generate affordable LMI housing in a supply proportional to the area LMI population”.

Although CDBG funds may require prioritizing sectors of the population with lower incomes and higher age brackets, we don’t recommend limiting all funds in this program only to those populations.”

PRDOH Response: Thank you for the suggestion. As required by HUD, 70% of the overall CDBG-DR grant must be expended to benefit low- and moderate-income persons. An estimated percentage of funding spent for each program which will benefit low- and moderate-income persons is included in the overall budget table included in the Action Plan.

“2 – INCENTIVE PROGRAM DESIGN

The “COMMUNITY ENERGY AND WATER RESILIENCE INSTALLATIONS” program (P. 143-145) includes the most substantial funding for solar + storage systems in the Draft Plan. In addition to greatly increasing the amount of funding in this program, we also recommend changes and additions to better set the program up for success.

a. Include storage whenever referring to solar. Also, erase the phrase “to backfeed the structure”, as solar + storage systems power buildings directly. The bottom paragraph on P. 144 could be rewritten as follows:

“The larger-scale longer-term component of this program, above and beyond the stove and water heater components, will entail energy and water resilience installations. Eligible applicants will have the ability to apply for solar panel with battery storage, and water catchment systems retrofits for residential structures. For the solar panel with battery storage component, this involves a variable scale solar power and battery retrofit designed to backfeed the structure to provide sufficient power to run critical household appliances and allow for shelter-in-place options

during outages. The scale of the solar power system and battery storage will depend on the size of the household, income, and the ability of the applicant to finance a portion of the system. Similarly, the water catchment system...”

b. Program Specifics

We recommend partnering with the solar and storage industry to design the most effective program parameters and administration strategy, by including SESA as an official partner in this program.

In addition, we recommend considering including the following in this Draft Plan:

Don’t design the program to be simply a 100% subsidy, but rather consider a variety of program designs, in consultation with solar and storage industry leaders as well as relevant government agencies involved in past administration of similar programs, to determine the most effective program design for these funds.

Offer funds uninterrupted, as opposed to a “lottery” system where applications are only accepted a few times per year. The “lottery” system has proven, in Puerto Rico and in markets across the country, to have a “freezing” or “stop-start” effect on solar sales and installations which has the effect of creating market instability. When program funds are offered, they should be offered uninterrupted, and paid out either as an up-front incentive or paid automatically and immediately after system installation; but they should NOT be offered on a “reimbursement” basis, as the Green Energy Fund has done in the past. The “reimbursement basis” has resulted in millions of dollars in funds being delayed for a matter of years, causing great financial hardship to customers and the solar companies involved in these projects.

Consider not limiting the PPPE as the only key partner in administering this program, and not limiting them to being a part of the Green Energy Fund. Given the past and current problems with administration of this fund, it could be a better model the administration of these funds of the State Energy Program, which functioned to administer ARRA fund incentives in Puerto Rico in the past. Whichever agency is ultimately responsible for fund administration, program design should happen with robust input from companies and individuals directly involved with past programs of a similar nature.

Include the flexibility to either design the program based on a percentage of total installed costs, or a fixed dollar-per-Watt amount, with a required ratio of Watt-hours of storage to Watts of solar power.

A declining amount of subsidy, such as the % or dollar-per-Watt amount dropping gradually for every 10% of program funds that are committed. For example, the program could start off as a 70% incentive for the first 10% of program funds, then 65% for the following 10%, and so forth; and higher incentives could be offered to lower-income or higher-vulnerability residents.

Include minimum requirements for solar + storage contractors. Such requirements could be modeled after the “ELIGIBILITY CRITERIA” for the “CONSTRUCTION AND COMMERCIAL REVOLVING LOAN” program (P. 153), which states:

“Eligible businesses must:

- Provide evidence of status as a licensed contractor or subcontractor with demonstrated track record where principals are residents of Puerto Rico;
- Submit a Recovery Plan with performance goals along with evidence of skills, experience, management capacity and a track record of meeting financial obligations; and
- Satisfy underwriting criteria for financial and performance capabilities.”

3 – INCLUDE SOLAR + STORAGE IN OTHER PROGRAMS

The following is a list of other programs included in the Draft Plan which could be clarified to state that solar + storage are included in them.

“MULTI-FAMILY RECONSTRUCTION, REPAIR & RESILIENCE PROGRAM”,

P.147

- Include “and solar and storage systems” after the words “code compliance updates”, at the end of the first sentence

“SMALL BUSINESS INCUBATORS AND ACCELERATORS”, P. 159

At the bottom of the page, specify that “resilience measures to allow for continuity of business operations in the event of power outages...” are limited to, or give heavy preference to, solar + storage systems which don’t require delivery of fuel supplies.

“WORKFORCE TRAINING PROGRAM”, P. 161

- Specify in the PROGRAM PRIORITIES that workforce training for building modern, resilient power systems, including a special program for the education of PREPA workers, is included.

“RE-GROW PR URBAN-RURAL AGRICULTURE”, P. 175

- Electricity is required to operate crucial functions of many agricultural operations, including greenhouses and aquaculture/aquafarming, which are important for food security.
- Specify the inclusion of “solar and storage solutions to power agricultural operations” as part of this project.

“CRITICAL INFRASTRUCTURE RESILIENCE PROGRAM”, P. 180

- At the bottom of the page, under “ELIGIBILITY”, add “solar and battery storage” as a critical infrastructure category.

“COMMUNITY RESILIENCE CENTERS”, P. 183

- Replace the bullet point “Back-up generation/ Solar panels” with “Back-up power generation: Solar panels with battery storage”

“CITY REVITALIZATION PROGRAM”, P. 186

- Under “PROGRAM ACCOMPLISHMENTS”, after “bringing community businesses back online”, add “, and keeping them back online through construction of resilient solar + battery solutions”.

“CITY REVITALIZATION PROGRAM”, P. 187

- *Under “PROGRAM OBJECTIVE & DESCRIPTION”, 3RD paragraph, first sentence, after “green infrastructure installations”, insert “(including solar + storage systems)”*
- *Note the text “(This program will maintain an option to expand funding of RE-GREEN components under third tranche for mitigation).”; include this text in the “COMMUNITY ENERGY AND WATER RESILIENCE INSTALLATIONS” program, and anywhere else funding for solar + storage appears in the document.*

4 – INCLUDE FUNDING FOR UTILITY-SCALE SOLAR

As one of the main reforms to improve the direction of the economy and promote growth, the Fiscal Plan for Puerto Rico calls for providing low-cost and reliable energy through the transformation of PREPA. In turn, PREPA’s Certified Fiscal Plan acknowledges that major drivers in the transformation of PREPA include “accelerated large scale renewable and storage procurement.”

According to a PREPA report filed with the Energy Bureau on July 3, 2018, PREPA has projects representing approximately 273 MW of grid-scale renewable projects in either commercial operation or in pre-operation⁵. By contrast, PREPA’s Certified Fiscal Plan describes an aspirational least-cost generation plan that proposes to increase the integration of renewables nearly 9 times the foregoing amount by 2023⁶. Roughly speaking, the Fiscal Plan envisions 300 MW of energy storage, 1,600 MW of solar, and over 700 MW of wind by 2023. This proposal is not founded on environmental or social considerations. PREPA proposes this because it is counting on a major build out of renewables to create fuel cost savings.

There are at least 14 grid-scale solar projects at advanced stages of development which could quickly set in motion the transformation envisioned in PREPA’s Certified Fiscal Plan. There are also other utility scale projects in development which could further augment installed renewable energy capacity. The assignation of some CDBG funds to large-scale solar projects could ensure that construction will take place in the foreseeable future in connection with these projects because, among other reasons, there are currently no viable sources of funding which would accept the financial risk associated with PREPA.”

PRDOH Response: Thank you for your comment. PRDOH will take this information and these suggestions into consideration during further development of programs outlined in the Action Plan or during development of new programs, if additional funding becomes available.

Comment: #341_10-21-18_Lucy M. Cruz Rivera (G-8, Inc.)

“El Grupo de las Ocho Comunidades Aledañas al Caño Martín Peña, Inc. (G-8 Inc.) resolved to consider the following issues:

1. Acknowledge our participation in the public view done on the 15th of October 2018 in Toa Baja by Nayda Bobonis Cabrera, G8 community leader, for the Fideicomiso de la Tierra del Caño Martín

Peña María Hernández Torrales and for the Corporación del Proyecto ENLACE Lyvia Rodríguez Del Valle.”

PRDOH Response: PRDOH recognizes the public participation of the G-8 leaders as part of the citizen engagement process and appreciates and values your input.

2. Acknowledge the Integral Development Plan and Land Uses for the Distrito de Planificación del Caño approved by the Junta de Planificación. That plan establishes the processes previous to the dredging, relocation project and the dredging itself. Besides, it considers the flow problems in the district of Caño Martín Peña. We want to reaffirm that those problems will disappear once the rain sanitary sewage system will be built and water will be dredged.”

PRDOH Response: The CDBG-DR programs seek to build upon past and ongoing community efforts, coordinate with other planning efforts, and will comply with Puerto Rican law and Federal requirements. PRDOH looks forward to continuing work with the G-8 communities as programs are further developed and begin to be implemented.

3. To acknowledge also the Fideicomiso de la Tierra del Caño Martín Peña, organization that wants to avoid the involuntary movement. Specifically, regarding acquisitions that will happen within the district, it is of outmost importance the coordination with the Fideicomiso and the Corporación to guarantee agreement with our plans.”

PRDOH Response: Although the CDBG-DR Action Plan is aligned with the Plan for Puerto Rico, PRDOH did not author the Plan for Puerto Rico, which is a separate overarching plan to the Recovery. However, the Uniform Relocation Act is applicable to activities conducted with CDBG-DR funds and will be adhered to by PRDOH.

“4. The Plan of Action is not in accordance with the vision of the Governor of Puerto Rico, Honorable Ricardo Rosselló Nevares, who maintains the communities. It is also not in accordance with Law 489 of 2004, nor the Plan of Integral Development and Uses of the Land for the District of Special Planning of Martín Peña Canal. We must not overlook the promises of the current government and administration through the Governor of Puerto Rico, Honorable Ricard Roselló Nevares, the Resident Commissioner, Honorable Jennifer González, Honorable Carmen Yulín Cruz, and members of the private sector who back and support all the initiatives of the Link Project of the Martín Peña Canal in conjunction with the leadership of G-8.”

PRDOH Response: The CDBG-DR programs seek to build upon past and ongoing community efforts, coordinate with other planning efforts, and will comply with Puerto Rican law and Federal requirements. PRDOH looks forward to continuing work with the G-8 communities as programs are further developed and begin to be implemented.

“5. Communities and people must have a say for where they want to live. The plan raíces issues of relocation without taking into account the particular needs of each community. There must be an inclusive participatory process where, within a community-based organization, the residents explore the different options that best benefit themselves and the community.”

PRDOH Response: The CDBG-DR Action Plan housing programs do not consist of mandatory relocation. The Whole Community Resilience Program is a participatory planning process

where the community members will indeed have the opportunity to explore distinct options, as your comment recommends. PRDOH appreciates and thanks the G8 for your comments.

Comment: #342_10-21-18_Lyvia N. Rodríguez Del Valle (Corporación del Proyecto ENLACE del Caño Martín Peña)

Summary: The Corporación del Proyecto ENLACE del Caño Martín Peña (ENLACE) and the Fideicomiso de la Tierra del Caño Martín Peña (Fideicomiso) presented comments to the amendment of the Puerto Rico Disaster Recovery Action Plan (Action Plan). The full submittal is included as part of the public record. The main comments provided are:

“Undoubtedly, CDBG-DR funds will drive land use, housing, and overall development in the next years. Our comments and suggestions are geared towards ensuring the disaster recovery policies drive a more equitable, just, and participatory development.

Overall, the amended Action Plan is still not compatible with the public policy regarding the District’s comprehensive development, which will ultimately reduce flood risks throughout the San Juan Metropolitan Area. Contrary to the objectives of the CDBG-DR program and PR Law 489-2004, it promotes community displacement. To address this, we suggest the following:

The Housing Program should allow for construction of new homes and reconstruction within the floodplain, wherever mitigation is feasible, and flood prone conditions will change as those mitigation activities are implemented.

89% of the District is classified as a floodplain in FEMA’s April 13, 2018 flood maps. Current parameters in the draft amended Action Plan does not allow rehabilitation nor construction of housing in floodplains, even when mitigation measures can be easily implemented. As most of the District is currently within the floodplain, by not allowing for new infrastructure and the construction and rehabilitation of housing, the Action Plan promotes displacement, rather than community cohesion and on site recovery. The District is highly vulnerable to floods, mainly due to the lack of adequate storm water management, an old, clogged, and in some areas collapsed storm water system, the lack of wastewater sewer systems, and due to a clogged Caño Martín Peña. Addressing these issues is a significant part of the District’s plan, and can be done through a combination of mitigation strategies. Thus, CDBG-DR funds should be used to support such mitigation strategies. Both providing adequate infrastructure, public spaces, and dredging the Caño require real estate acquisitions and the relocation of eligible occupants. Over 700 families have been relocated from the most vulnerable areas in the communities along Martin Peña, and such relocations have been feasible as families have had the opportunity to choose to stay within their neighborhoods. Instead of requiring families that are in dire need of housing after Hurricanes Irma and Maria to move to other areas of the city at the expense of community cohesion, they should have the alternative to choose to stay. CDBG-DR funds should be available for the construction of new housing and well as housing repairs within the floodplain, as it will allow for the mitigation measures that will reduce flood risks to take place. They should consider transitional periods, as once the Caño is dredged and infrastructure in place, floodplain will change.

Also, in the case of communities that do not have a comprehensive development and land use plan like Martin Peña, and will undergo a whole community planning process, it is important that policies allow for that process to take place, and do not dictate for displacement where mitigation is feasible.”

PRDOH Response: The Housing Program has been amended in the Substantial Amendment to allow rehabilitation to eligible applicant homes in the floodplain so long as the rehabilitation falls under federal thresholds for substantial improvements. As outlined in the Action Plan, HUD has announced a forthcoming allocation of approximately \$8.3 billion in CDBG-DR Mitigation funds, at which time federal guidelines for the use of those funds will be issued. PRDOH looks forward to developing comprehensive programs informed by public comment regarding the use of those funds when federal requirements are published.

“2. The Housing Program should not dictate which home a family chooses.

The Home Repair, Reconstruction, of Relocation Program requires families to choose a home from a list prepared by the PRDOH, and only when a home is not available within that list, CDBG-DR funds can be used for construction. This policy might force families to leave their communities, at the expense of community cohesion, and is therefore contrary to the policies set forth to minimize displacement.”

PRDOH Response: Families choosing a new home may select from existing market-based units or units identified on a PRDOH-certified development roster. Units may be bank-forsclosed properties, on a PRDOH certified development roster, a market-listed unit, or a home in a condominium or co-op. Existing homes must be located in Puerto Rico and must meet Housing Quality Standards (HQS), and pass applicable environmental clearance and permit requirements before an applicant awardee may move in.

“3. Elevation Standards for new construction, repair of substantially damages structures, or substantial Improvements to residential structures in flood hazard areas (p.101), should be used to allow for construction within the floodplain, rather than the prohibition set forth on the Home Repair, Reconstruction, or Relocation Program.

The draft amended Action Plan states (p. 101) that the “PRDOH will document when elevation, as opposed to alternative strategies, is cost reasonable to promote a community’s long-term recovery on a neighborhood or local government level as part of the Whole Community Resilience Planning Program.” Also, the corporation requests a waiver so that (a) participation in the Whole Community Resilience Planning Program is not a prerequisite for elevation, as there is a Comprehensive Development and Land Use Plan in place; and (b) the applicable Elevation Standard for new construction, repair of substantially damaged structures, or substantial improvements to residential structures in flood hazard areas, such that the lowest floor is at least 1 feet above the 1 percent annual floodplain elevation.”

PRDOH Response: As outlined in the Action Plan, HUD has announced a forthcoming allocation of approximately \$8.3 billion in CDBG-DR Mitigation funds, at which time federal guidelines for the use of those funds will be issued. PRDOH looks forward to developing the next phase of comprehensive programs informed by public comment regarding the use of

those funds when federal requirements are published. That suite of programs may include elevation and/or mitigation at the neighborhood level as determined to be cost reasonable, as required by HUD. PRDOH acknowledges the Corporation's request for a waiver to participate in the Whole Community Resilience Planning Program as a prerequisite for elevation.

"4. When a family moves as part of the Home Repair, Reconstruction, or Relocation Program, the prohibition to use the lot they occupied in the future might lead to conditions of blight, when in urban areas. In the case of the District, such empty lots should be made available for the Fideicomiso de la Tierra to use in accordance with the District Plan. Otherwise, it is not clear who will be in charge of the maintenance of such empty lots, how to prevent their use for illegal dumpsites. Shall the restriction for use of the land be lifted, it shall be made in a way that does not promote displacement and gentrification."

PRDOH Response: PRDOH acknowledges the recommendation and will ensure it is properly considered as part of the property disposition strategy for vacated properties.

"5. Cost-benefit analysis (p. 101) should not be limited to the comparison of construction costs to repair and incorporate mitigation measures versus reconstruction to the highest resiliency standard. Such analysis leaves other aspects of development unaddressed. For example, in the case of Martin Peña, not only does not it account for the socioeconomic costs of displacement of communities or the benefits of strong community cohesion, but also the benefits to the environment (the San Juan Bay Estuary), the economy (future tourism opportunities), key infrastructure (Luis Muñoz Marín International Airport), public health, among others that the comprehensive development of the District will entail. Thus, key decisions can be made with a stringent view of their impacts."

PRDOH Response: PRDOH conducts cost-benefit analysis to HUD standards. HUD may issue guidance to grantees and may require a grantee to verify cost reasonableness from an independent and qualified third-party architect, civil engineer, or construction manager. PRDOH provides your comment to HUD so that it may inform their guidance on cost reasonable standards.

"6. The Action Plan should not set stringent cost limits for the Home Repair, Reconstruction, or Relocation Program, as construction costs are increasing steadily whereas real estate values are decreasing. The Action Plan should clearly address how the gap will be financed, in a way that does not constitute a burden for low and very low-income families."

PRDOH Response: PRDOH is required by HUD to provide a description of the maximum amount of assistance available to a beneficiary under each of the grantee's disaster recovery programs as outlined in 83 FR 5850.

"7. Within the District, per Law 489-2004 all relocations are managed as per the URA. The Action Plan is not clear regarding PRDOH's request for waiver of URA policies. This may cause an unequal treatment where CDBG-DR funds, which is contrary to the Law 489-2004 policies. Also, it is critical that families undergoing relocations to give way to infrastructure and other improvements have

access to a safe, decent, replacement home, and do not have to cover associated expenses, as per URA standards.”

PRDOH Response: PRDOH is not seeking a waiver to URA policies. The CDBG-DR projects will conform to URA requirements as modified or waived by HUD.

“8. The flood insurance requirement for eligibility for CDBG-DR funds might impact adversely the possibility of low income, very low income, and extremely low income families, or families with special needs, to benefit from the programs, as they often do not have the economic resources to purchase such insurance. Disqualifying them for their inability to purchase insurance effectively penalizes them for their lack of income, and excludes a large portion of the District population. We recommend the PRDOH either to request a waiver to HUD regarding this requirement, or to create a program under CDBG-DR to help fund the insurance in such cases.”

PRDOH Response: With respect to flood insurance, a HUD-assisted homeowner of a property located in a Special Flood Hazard Area (i.e. floodplain) must obtain and maintain flood insurance in the amount and duration prescribed by FEMA’s National Flood Insurance Program. Section 102(a) of the Flood Disaster Protection Act of 1973 (42 U.S.C. 4012a) mandates the purchase of flood insurance protection for any HUD-assisted property within a Special Flood Hazard Area. PRDOH acknowledges your recommendation to provide flood-insurance assistance to LMI families receiving HUD assistance in the floodplain.

“9. The ENLACE Caño Martín Peña Project is an strategic project for Puerto Rico’s future, as has been characterized in legislation and other documents. Because of its significant benefits, interdisciplinary and multisectoral approach, and its comprehensive nature, we strongly suggest that it is recognized as a distinct multisector initiative, where the Corporación del Proyecto ENLACE and the Fideicomiso de la Tierra are subrecipients. It has been widely documented that further delaying significant investment in continuing to implement the District Plan has important negative impacts in the public health, the environment and increases risks. We recommend that this Action Plan incorporates \$120 million to support shovel ready infrastructure and housing projects, including (a) the Paseo del Caño Sur and infrastructure at Israel Bitumul North (let by the Corporación del Proyecto ENLACE); (b) relocating of the Rexach Syphon (PRASA); (c) construction of a scattered site housing within the District, one foot above the flood levels, using existing designs; (d) acquisition of privately owned scattered plots of land, including those outside of the current floodplain, to give way to new housing; (e) real estate acquisitions and relocations, either to move families from severely hurricane affected homes or from relocation areas that will allow for infrastructure measures.

The ENLACE Project is a comprehensive community development already being implemented in the Caño Martín Peña Special Planning District whose objectives are compatible with these CDBG-DR national objectives and the Housing and Community Development Act. The Government of Puerto Rico has reiteratively stated their support to continue implementing the comprehensive development of the Caño Martín Peña Special Planning District through the ENLACE Project Corporation, which already has represented an investment of over \$100 million toward implementing the Plan, relocating 700+ families and having executed 5 out of 10 critical infrastructure projects in the 8 communities adjacent to the Martín Peña Channel.”

PRDOH Response: PRDOH acknowledges the recommendation and will maintain communication with the communities served by ENLACE as first-tier recovery funding, especially as it relates to infrastructure, is provided by FEMA Public Assistance, the US Army Corps of Engineers and other agencies such as PRASA is implemented. CDBG-DR funds are supplementary to and may not duplicate benefits that have been provided by FEMA or USACE.

“10. The Corporación del Proyecto ENLACE and the Fideicomiso de la Tierra should be subrecipients for those programs that are implemented within the District, and such programs should be compliant with the Laws and policies in place for the District’s comprehensive development.”

PRDOH Response: Thank you for your comment. CDBG-DR programs will be conducted in a manner that is compliant with Federal and Puerto Rican law.

“11. The Action Plan should establish parameters further the impact of the CDBG-DR funds in the local economy, such as a percentage contracts that must be destined for Puerto Rican contractors, as well as for PYMES and micro businesses. Policies to hire Puerto Ricans and to buy local products should also be incorporated. In the case of the District, there are local policies in place to favor community entrepreneurs.”

PRDOH Response: Thank you for your comment. PRDOH seeks to maximize local contractor and business participation in the CDBG-DR programs to the extent feasible while also complying with HUD Section 3 requirements and procurement requirements as outlined in 2 CFR 200. Additionally, the Small Business Financing program provides grants and loans for eligible small businesses. Please review the Action Plan for information regarding this program.

Other Comments:

“12. The referenced documents concerning federal regulations should also be included in the CDBG-DR homepage of PRDOH, to facilitate public comments.

13. The amended Action Plan, on page 94 of the English version, identifies four programs in the written text and five programs in the figure. Review the text as to include the new program: Multi Sector.

14. The Action Plan includes a description of the Hurricane’s impact to demographics, infrastructure, and the economy. However, the document fails to discuss impacts to stormwater, sanitary, and potable water infrastructure, roads, sanitary landfill systems, and natural resources. Those impacts should be discussed.

15. On page 100, the Action Plan establishes that “projections for expenditures and outcomes will be submitted to HUD with the action plan and will be amended [sic] as needed throughout the life of the grant.” These projections are not included in the Plan. The Action Plan should clearly establish: (a) an itinerary of deadlines; (b) the procedure for presenting applications, particularly for those proposed uses where funds are accessible to sub- recipients and partners; and (c) eligibility and evaluation criteria for applications to each one of the programs.”

PRDOH Response: Thank you for your comments. PRDOH has reviewed the Action Plan and added the Multi Sector program to the descriptive text. Original projections were posted on the PRDOH website on www.cdbg-dr.pr.gov and will be amended as needed and re-posted to the website. Guidelines and outreach materials for programs will also be published to the website as programs are implemented.

“16. The Fideicomiso de la Tierra del Caño Martín Peña, as well as G-8, Grupo de las Ocho comunidades aledañas al Caño Martín Peña, Inc. (G8), submitted comments during the March 5-10 process and in writing. but were not included under the “Non-Governmental Agency Comment Submitted” list. Also, the Corporación del Proyecto ENLACE del Caño Martín Peña was included as a Non-Governmental Agency, when it is a governmental corporation.

Page 10 of the amended Action Plan mentions the existence of a Puerto Rico Housing Task Force “comprised of government leaders” that collaborate and advise on critical issues, including informal and substandard housing solutions, foreclosure prevention and mitigation, and flood zone impact. These subcommittees meet on a regular basis to discuss in depth environmental conditions on the ground in Puerto Rico, drivers of resilience and policy solutions, and deliver actionable solutions for Puerto Rico’s recovery.” PRDOH and COR3 are mentioned as participants in this process of policy development. The amended Action Plan should clarify who comprises the Task Force and what other persons or entities have participated in the development of the policies proposed in the Action Plan for implementation through the use of CDBG-DR funds. These participants have been involved in the elaboration of policy regarding issues (housing, flood-prone areas) that could potentially have an enormous impact on certain communities. As such, it is important to know who said participants are and whether the relevant communities have been allowed to participate in these processes. (b) Particularly, how community groups participated in the elaboration of the amended Action Plan should be detailed in said document.”

PRDOH Response: Thank you for your comment. The plan has been clarified to list ENLACE as a governmental corporation. Community engagement is outlined in the Action Plan and public comment is posted in full on the PRDOH website on www.cdbg-dr.pr.gov. The Puerto Rico Housing Task Force Coordinating Agency is the U.S. Department of Housing and Urban Development.

Primary Agencies include:

- **Federal Emergency Management Agency**
- **U.S. Department of Agriculture, Rural Development**
- **U.S. Department of Justice**
- **Supporting Agencies Include:**
- **U.S. Department of Commerce**
- **U.S. Department of Health and Human Services**
- **U.S. Environmental Protection Agency**

- Corporation for National and Community Service
- U.S. Small Business Administration
- U.S. Department of Energy
- American Red Cross
- U.S. Department of Veteran Affairs
- National Voluntary Organizations Active in Disaster
- Commonwealth Partners:
- Puerto Rico Department of Housing
- Puerto Rico Housing Finance Authority
- Puerto Rico Public Housing Administration
- Central Recovery and Reconstruction Office
- Office of Socio-Economic and Community Development
- Puerto Rico Planning Board
- Puerto Rico Emergency Management Agency
- Puerto Rico Department of Family

“17. Between pages 113 and 117, among the information provided for “Whole Community Resilience Planning” and “Agency Planning Initiatives (GIS, Planning Integration)”, general references are made regarding planning processes previously established in Puerto Rico. In the case of Resiliency Planning, the draft amended Action Plan establishes on page 113 that the program will result in “comprehensive community recovery plans, the benefit of which will allow communities to develop policy, planning, and management capacity so that they may more rationally and effectively determine their needs, set long-term goals and short-term objectives, devise programs and activities to meet goals and objectives, evaluate the progress of such programs in accomplishing these goals and objectives, and carry out management, coordination, and monitoring of activities necessary for effective planning implementation.” Further, on page 115, the draft amended Action Plan establishes the following: “PRDOH will be the administering agency with the Foundation for Puerto Rico as the lead implementation partner, and PRDOH and the Foundation will receive the community applications and final plans, as outlined in forthcoming guidelines. PRDOH and the Foundation for Puerto Rico will work collaboratively with relevant governmental entities such as The Puerto Rico Planning Board, ODSEC, et al. and key community-based non- profits in the development of program guidelines to ensure consistency and a coordinated approach.”

a. Specify (i) the measures that will be taken to ensure effective and real community participation in the decision making process regarding the Whole Community Resilience Planning Program, in particular with decisions related to relocations; (ii) the criteria to choose the communities that

will participate in this program; (iii) how the planning program will not be affected by other programs that are implemented concurrently, so that its outcome is not defeated in the process.

b. There is a lack of consistency between the Whole Community approach and the rest of the programs included in the Action Plan. Whole Community requires participation and planning at a community wide scale. However, while such a process takes place, other programs that promote relocation of families and communities will be happening, affecting the possibilities to take advantage of the CDBG-DR funds for a well thought strategy that prioritizes on site mitigation, when feasible, above displacement, and that allows communities to decide how to address high risk areas. Thus, there might be tension among two processes with different objectives.

c. Phase I intends to collect data to make informed decisions and prioritize future action upon greater understanding of community needs in housing, infrastructure, economic development, health and environment, and education. Social aspects are an intrinsic part of low-income communities and their resilience and recovery efforts after a disturbing event such as Hurricane María. Place-based risk and vulnerability analysis to prioritize effective and expedient investments should consider these social networks.

d. The draft amended Action Plan should clarify how the strategies proposed therein will be considered or integrated vis-à-vis the Special Planning Districts designated by the Puerto Rico Planning Board, particularly the Caño Martín Peña Special Planning District.

e. Clarify how these new plans will relate to existing plans, including the Puerto Rico Land-Use Plan and municipal land use plans. In particular, we are interested in knowing how they will relate to the Comprehensive Development and Land-use Plan for the Caño Martín Peña Special Planning District.

f. Clarify the criteria used to choose Foundation for Puerto Rico (FPR) to be the lead implementation partner of the “Whole Community Resilience Planning”, including expertise and prior experience.”

PRDOH Response: Mechanisms to incorporate and support land use planning are included in the Action Plan, as functions of Agency Planning Initiatives and Whole Community Resilience Planning. Further, the Action Plan should not be viewed in a silo with respect to other land use planning or other planning efforts underway on the Island, and in fact HUD provides direction to this end in the Federal Register Notice. In addition, land use planning will be considered as a function of other recovery programs such as Critical Infrastructure Resilience and the City Revitalization Program, as just two examples.

Your input is helpful, and as program guidelines are developed this feedback will be instrumental. Specific eligibility criteria regarding phase 2 of the Whole Community Resilience Planning program will be published in the first quarter of 2019, as outlined in the Action Plan.

“18. We urge the PRDOH to recognize the policies and instruments that are already in place, so that funds are focused on moving forward the work that will ultimately reduce risks for the San Juan Metropolitan Area, and address public health and safety issues. Please discuss how the amended Action Plan supports the implementation of the District Plan, complies with the public

policy laid out in Act 489-2004, and supports the Government of Puerto Rico request for CDBG-DR funds for the Caño Martin Peña as laid out in the document “Build Back Better Puerto Rico: Request for Federal Assistance for Disaster Recovery”. A request of \$1B in both CDBG-DR and USACE funds was included.

19. Finally, discuss how the amended Action Plan supports the public policy regarding the role of ENLACE, the Fideicomiso, and the G-8 in the implementation of the District Plan.”

PRDOH Response: CDBG-DR programs will be conducted in accordance with Federal and Puerto Rican law and will maximize planning efforts already conducted or underway. PRDOH acknowledges that the estimate of unmet need in the Build Back Better report greatly exceed the funds made available to date, including the approximately \$9.7 billion in CDBG-DR funds included in the Action Plan. The CDBG-DR funds must be made available to impacted residents across the island, not just limited to residents of the area of Caño Martin Peña.

“20. The amended Action Plan states that Puerto Rico must ensure that no individual receives duplication of benefit for the same purpose and/or effect to recover from the hurricane (p. 79). It states that “Federal law prohibits any person, business concern, or other entity from receiving Federal Funds for any part of such loss as to which he has received financial assistance under any other program, from private insurance, charitable assistance, or any other source.

(a) Clarify whether FEMA Individual Assistance (FEMA IA) Funds or assistance received as part of the STEP Program (“Tu Hogar Renace”) are considered when ensuring an individual does not receive duplication of benefit in general, an in particular, in the context of the Homeowner Repair, Reconstruction, or Relocation Program and of each of the other housing programs proposed in the Action Plan.

(b) Shall FEMA IA, STEP or both benefits have to be considered, please describe how this will affect the ability of moderate, low income, and very low income families, as well as that of other disadvantaged populations, to benefit from each of the housing programs, and the measures that will be taken to fill the gaps.”

PRDOH Response: Duplication of Benefit determinations will be made in accordance with HUD guidance, and the specific provisions will be detailed in program guidelines which will be posted to the PRDOH website.

“21. Regarding the title clearance program, please clarify whether it will be available only to those homeowners that request such assistance. Title clearance is not required for a person to have property rights, and there might be situations in which the process might be highly conflictive for a family, particularly regarding successions and inheritances. Also, protective measures for women in a situation of domestic violence, who seek to clear titles, must be considered.

22. We recommend that the Action Plan acknowledges that there are other alternatives to fee simple titles that further advance the goals of avoiding the displacement of communities, promoting “whole communities” and ensuring long-term affordability. Thus, we recommend that the Title Clearance Program:

(a) Provide real opportunities for communities to analyze options according to their priorities and choose how they want to address land tenure. Alternatives to individual land titles should be offered, such as community land trusts (CLTs), which help to ensure long-term housing affordability, community cohesion, prevent gentrification, reduce the rate of foreclosures, among other benefits. The Fideicomiso is available to support this process.

(b) Support the transfer of public lands to allow for the creation of CLTs as well as using funds to buy private lands where necessary to regulate land tenure (i.e., when usucaption or an acquisition process (“usucapión”) is not applicable).

23. The process to recognize and document land rights is complex. In areas where the government has issued land titles, there is lack of adequate documentation as to which titles were issued, as well as conflictive documentation between the PR Property Registry, the documents that families have, as well as the information available in reports, files, and maps in government agencies and municipalities.

(a) Low income families need to have access to lawyers that represent them in the process to obtain a declaration of heirs and clear succession issues. Funds should be made available to law school clinics and legal aid entities such as the Sociedad para Asistencia Legal, among others, so that they can have sufficient resources to provide assistance to low and very low income families that need to obtain a declaration of heirs prior as a critical step to regularize land tenure. In addition, funds should be made available to pay for other related costs in the courts, or to obtain documents from government agencies, for example. These strategies were used in Louisiana after Hurricane Katrina.

(b) In our experience, families also need assistance and guidance in the process to obtain the support documents from government entities. Therefore, funding should take that into account, and cover for staff to accompany the families in the process.

(c) Funding should be made available to the PR Treasury Department and the Office of Notarial Inspection (“Oficina de Inspección de Notaría”; ODIN, for its Spanish acronym) to be able to expedite the process to issue the Estate Tax Return (“Planilla del caudal relicto”), and the Negative Certification of Non-Contentious Cases (“Certificación negativa de asuntos no contenciosos”), respectively.

(d) Support CLTs work to regularize land tenure, providing funds to conduct title investigations, surveys, databases, and others necessary to issue surface rights deeds to families living in CLT land, where necessary.”

PRDOH Response: Thank you for your input on the Title Clearance Program. PRDOH will take these suggestions into consideration during further development of the program.

“24. The amended Action Plan states the following about URA compliance:

“PRDOH will ensure that the assistance and protections afforded to persons or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), and Section 104(d) of the Housing and Community Development Act of 1974 are available. PRDOH plans to exercise the waivers set forth in Federal Register/Vol. 83, No. 28/Friday, February 9, 2018 pertaining to URA and HCD Acts given its priority to engage in voluntary acquisition and optional

relocation activities to avert repeated flood damage and to improve floodplain management.” (p. 98) “Given its priority to engage in voluntary acquisition and optional relocation activities to avoid repeated flood damage and improve floodplain management, Puerto Rico accepts the HUD waiver of the Section 104(d) requirements, which assures uniform and equitable treatment by setting the URA and its implementation regulations. Efforts to conduct voluntary buyouts for destroyed and extensively damaged buildings in a floodplain may not be subject to all provisions of the URA requirements.” (p. 123) We recommend:

(a) Discuss if families that will be relocated, in accordance with the amended Action Plan, will be considered to be displaced persons as per the URA.

(b) Explain how the eligibility criteria of “ownership of property structure (alternate method)” complies with URA criteria regarding displaced persons and eligible occupants.

(c) Explain how the eligibility criteria for the Homeowner Repair, Reconstruction, or Relocation Program complies with URA, including relocation assistance rights under URA. For example, URA states that an owner occupant has the right to replacement housing if he/she has actually and lawfully occupied the displacement dwelling for at least 90 days immediately prior to the initiation of negotiations, among other requirements. The amended Action Plan states as an eligibility criterion: “Must have occupied the property as a primary residence at the time of the storm. (p.125 - Home repair, reconstruction, or relocation program)” Afterwards, it states that: “Applicants may be required to prove primary residency [sic] by providing documentation validating occupancy for consecutive weeks and/or months leading up the time of the storm.” (p. 126). Please explain how these criteria will be harmonized, and the implications for families that were occupying the structure at the time of the storm and had to move afterwards.

PRDOH Response: The CDBG-DR projects will conform to URA requirements as modified or waived by HUD. URA applicability will be made in accordance with HUD guidance, and the specific provisions will be detailed in program guidelines which will be posted to the PRDOH website.

“25. The amended Action Plan recognized the CDBG-DR requirement that activities must be designed to eliminate or minimize the occurrence of displacement. However, some of the proposed activities, as explained in the amended Action Plan, might lead to displacement. For example, the NOFA allows “alternatives strategies, such as demolition of substantially- damaged structures with reconstruction of an elevated structure on the same site, property buyouts, or infrastructure improvements to prevent loss of life and mitigate future property damage”. However, the amended Action Plan focuses on buyouts and relocation outside of high-risk areas excluding elevation of structures and infrastructure improvements, mitigation measures that can reduce or even eliminate vulnerabilities, and that could prevent displacement.

26. Disaster management literature has demonstrated, and the amended Action Plan recognizes that community cohesion, social relations, the state of institutions are critical indicators when analyzing vulnerability and the ability of a community to respond after a disaster. The Social Vulnerability Index (SOVI) methodology does not take these into consideration. These factors should be included in the vulnerability analysis.

27. Explain how the policies and programs proposed in the amended action plan strengthen social cohesion rather than weakening such critical aspects for disaster response. In particular, discuss how the requirement to repair and rebuild outside of high risk areas where mitigation alternatives such as elevated structures and infrastructure improvements are feasible, affects community cohesion and promotes displacement.”

28. Explain what happens to residents that have the need to move but do not own a title to their land.

29. On page 125, the amended Action Plan establishes that “To be eligible for reconstruction in place, property must not be located in a floodway, flood- plain, or areas vulnerable to landslide. Applicants located in high-risk areas may be eligible for relocation or rehabilitation. Construction projects in the floodplain which qualify as substantial improvements, as defined in 22 CFR 55.2, will not be rehabilitated. Eligible applicants with homes in the floodplain which qualify for substantial improvement rehabilitation will be offered relocation assistance.”

(a) The federal register cited is incorrect, it should read 24 CFR 55.2.

(b) The options available make most residents of the communities surrounding the Caño Martín Peña ineligible for the reconstruction of their homes, forcing them to relocate and eventually resulting in the displacement of the community residents. No options that safeguard community cohesion are offered.

30. When describing compliance with program requirements regarding elevation standards, the amended Action Plan states the following: “As applicable, PRDOH will apply the elevation standards for new construction, repair of substantially damaged structures, or substantial improvements to residential structures in flood hazard areas, such that the lowest floor is at least 2 feet above the 1 percent annual floodplain elevation, as outlined in 83 FR 5850 and 83 FR 5861.” One of the priorities of the Homeowner Repair, Reconstruction, or Relocation Program is to relocate families in hazard zones, defined as areas situated in the floodplain, floodway, or areas vulnerable to landslides.

(a) Specify which maps will be used to determine hazard zones and provide access to those maps. For example, regarding the extent of the 1% annual floodplain elevation, 89% of the District is within the advisory base flood elevations (ABFE) as defined by FEMA in 2018. In contrast, 73% of the District is within the national flood hazard layer (2018).

(b) The amended Action Plan should include (a) a map, and list the communities with average income below the 80% Area Median Family Income that are located in high risk areas as defined in the amended Action Plan, where residents will not be able to reconstruct in place; and (b) a map identifying high risk areas where affected families will not be able to relocate to, and specify the sources of information and methodology. The scale of these maps should allow people to identify communities. Such maps will help understand the implications of the proposed programs in terms of displacement of communities, promote engagement and participation in the process to develop and implement the amended Action Plans, whole community resilience planning activities, and in defining acceptable risk reduction measures.

(c) The amended Action Plan should (a) estimate the number of families that will not be allowed to reconstruct in place or relocate within their communities; (b) list the communities that will be impacted by relocation activities.

(d) The amended Action Plan should not limit repairs and reconstruction to areas that are not deemed “high risk”, where in high-risk areas mitigation activities can be implemented to reduce risk as to minimize displacement and preserve community cohesion. Incorporate as a policy that where such risk mitigation activities are feasible, on site housing construction and reconstruction that meets the elevation standards, where applicable, will be allowed. Other policies to minimize displacement, recognizing that risk management measures can be implemented to reduce vulnerability, should be included.

(e) The District Plan acknowledges that according to a hydrologic hydraulic study, dredging the Caño will provide control of the regulatory flooding produced by discharge of Surface water bodies, reducing substantially, even totally, the susceptibility of the structures that are now vulnerable. The Plan recognizes the intermediate period between the relocation of families, implementation of infrastructure strategies and dredging, and to protect community cohesion, it promotes the elevation of structures within the current floodplain. The amended Action Plan must be made compatible with this policy.

(f) Both the Feasibility Report and Environmental Impact Statement for the CMP-ERP approved by the Assistant Secretary of the Army for Civil Works as per the WRDA-2007 and the 8 step process carried out in accordance with the Executive Order on the 8 step process demonstrate that there will be a reduction of the flood risk in the communities along the Caño Martin Peña once the ERP is completed. Also, studies carried out by ENLACE demonstrate that replacing the stormwater infrastructure and providing sewer systems, will significantly reduce flood risk in the District. In view of this fact, homeowners living in the communities along the Caño and within the current 1% annual floodplain should not be required to move and leave their communities, and they should be able to benefit from reconstruction in place, repair, or relocation within the communities.”

PRDOH Response: Thank you for your comments, including the discussion of social cohesion. Please see previous responses related to mitigation and elevation. The federal register citation has been corrected to 24 CFR 55.2. Eligible applicants seeking to voluntarily relocate out of the floodplain will be provided assistance under the Title Clearance Program if they are in need of validating ownership so that the substantially damaged property may be cleared. Thank you for your recommendations on methods to promote ongoing public engagement. Flood maps originate from Flood Zone Data – FEMA Map Service Center, <https://msc.fema.gov/portal> Advisory flood zone for Puerto Rico.

“31. The amended Action Plan should discuss what will happen to the empty lots that will result from buyouts, who will be responsible for the maintenance, the effects of buyouts in urban areas and scattered sites and whether they will promote blight. It should also discuss the measures taken to address those issues, and to ensure that buyouts do not end up facilitating gentrification and making lands available for development in the future.

32. *The Homeowner Repair, Reconstruction, or Relocation Program limits the maximum award to \$150,000 for rebuilding, and for a homeowner to purchase a replacement home and make any required improvements; and \$60,000 for repairs. Even though the maximum awards were increased to \$150,000 and \$60,000 for rebuilding and repairs respectively, we are concerned about the hike in construction costs, the low property values, and how the gap will be covered, so that it is feasible for low and very low-income families. Demolition and mitigation costs have increased and the \$5,000 cap for the demolition of structures will not satisfy the actual cost. Current relocation costs incurred by ENLACE amount up to \$160,000, when considering all costs, except demolition and mitigation costs for the original home.*

33. *When establishing parameters for the evaluation of cost reasonableness on page 101, the amended plan states that “HUD exempts disaster-damaged units that meet the grantee’s definition of “not suitable for rehabilitation” from one-for-one replacement requirements.” The definition of “not suitable for rehabilitation” is not included by the grantee, merely citing that: “PRDOH will define “not suitable for rehabilitation” in its policies/ procedures.” floodplain The real world implications of what does or does not constitute suitability for rehabilitation cannot fully be evaluated by neither HUD or the public.*

34. *Migration, gentrification, and displacement of communities are a significant issue in Puerto Rico. In New Orleans, gentrification is occurring at a significant scale due to the fact that close to 90,000 displaced residents were unable to return and that long term affordability measures were not implemented. Low-income families have limited access to affordable housing. The amended Action Plan addresses affordability measures, but does not address what will happen with housing units developed with CDBG-DR funds once the affordability period ends.*

(a) The amended Action Plan should consider promoting measures to reduce the stock of affordable housing lost to hikes in value, and thus to reduce the need for subsidized housing in the future. The amended Action Plan should promote the creation of community land trusts (CLTs), housing cooperatives, and other models that have proven to be successful in addressing long-term affordability for homeowners and renters, and community stabilization, particularly in areas that are prone to real estate pressures, gentrification, and displacement, or at risk of losing the affordable housing stock. This can be done by establishing a minimum percentage of new housing for homeowners and renters that must be developed with long-term affordability measures.

(b) With regards to the Caño Martín Peña Special Planning District and according to the FIDEICOMISO REGULATIONS, all new housing built with CDBG-DR funding built within the lands that belong to the Fideicomiso, or which are developed by the Fideicomiso, must remain affordable. An equity limitation formula is implemented at the time of the sales, and The Action Plan should change the method of distribution of the Homeowner repair, reconstruction, or relocation program to allow CLTs such as the Fideicomiso, its development subsidiary, Desarrollos Martín Peña, Inc., and the Río Piedras CLT, and any new CLTs that might be born as solutions to land tenure, to develop new housing, and to repair and reconstruct housing.

35. *The amended action plan does not specify the difference between buy out and acquisition.”*

PRDOH Response: Thank you for your comments regarding relocation, cost reasonableness, acquisition, gentrification, and affordable housing. As permitted by HUD, the standards for “not suitable for rehabilitation” will be outlined in program guidelines which will be evaluated by HUD and available to the public. Damaged properties acquired by PRDOH under both option 1 and option 2 for relocation will be maintained as green space. The Action Plan has been updated to clarify this point. PRDOH has placed substantial affordability measures on its housing programs, but PRDOH does not have purview over how private individuals choose to utilize their homes in the decades subsequent to the disaster recovery program after the affordability periods expire. PRDOH will take these suggestions and information into consideration during further development of programs or during development of new programs if additional funding becomes available.

“36. The amended Action Plan focuses on much needed housing counseling services to recovering services. However, it does not delineate how these individual choices will be linked to the Whole Communities planning and strategies, so that individuals are made aware of any mitigation and on site reconstruction opportunities and have the opportunity to stay in their communities and avoid displacement. Housing counseling activities should be intertwined to grassroots community organizing and participatory planning, as well as housing assistance provided to individual homeowners and renters.

37. We strongly suggest that Low Income Housing Tax Credits (LIHTC) developments include measures to allow renters to buy the housing units once the credits expire, as a measure to stimulate community stability and homeownership.

38. The amended Action Plan states that the PRDOH will request a waiver to shorten the 20-year affordability period to allow alignment with the 15-year affordability period required by LIHTC.

39. LIHTC developments should also incorporate measures to ensure connections with economic development strategies that promote local jobs and community-based businesses. For example, they can include mixed use, or provisions to hire maintenance locally, among others.”

PRDOH Response: Thank you for your comments. Housing Counselors will be extensively trained in the comprehensive portfolio of CDBG-DR program options and also have extensive knowledge of non-profit and external community service providers above and beyond the parameters of the CDBG-DR programs. Low Income Housing Tax Credits (LIHTC) are not issued by PRDOH. LIHTC are governed by the United States Internal Revenue Code (IRC). Thank you for your comments. PRDOH will take these into consideration during further development of the CDBG-DR Gap to Low Income Housing Tax Credit (LIHTC) program. The 20-year affordability period requirement remains in place.

“40. The amended Action Plan should discuss how the proposed programs will address the needs of renters, according to URA standards.

41. Only families in single-family structures qualify for the Home Repair, Reconstruction, or Relocation Program. The amended Action Plan does not discuss the reasoning behind limiting eligibility to single-family structures. In the District, it is a common practice for families to build a

second floor for their children, or to have more than one family living in the same household. The loss of the wood and tin roofs in the second floor, which also tends to be wood construction, also caused damages to the first floor, as the ceiling of the first floor was not meant to be exposed to the elements. It is common to find water filtration and mold in the first floor, affecting that housing unit as well. We strongly recommend these criteria be either eliminated, or at least changed to include such typologies.”

PRDOH Response: The CDBG-DR programs will comply with URA requirements. The Action Plan includes a Multi-Family Reconstruction, Repair & Resilience Program, as well as Rental Assistance, and access to rental housing through the LIHTC program. The multi-family program will provide funding for necessary expenses related to long-term recovery and restoration of multifamily housing and will increase the availability of affordable housing through strategic investments in multifamily buildings and by supporting code compliance updates in existing buildings. PRDOH will take your suggestions and information into consideration during further development of the housing program portfolio.

“42. The amended Action Plan does not state who will build new housing and how it will be financed. It seems there is no room for entities like ENLACE or the Fideicomiso to build homes with these funds, that can be made available for families undergoing relocation. In addition, the Direct Distribution Model can be disempowering and does not promote community organizing and the whole communities’ model. This model engages only the individual and his/her needs, encourages individuals to solve their particular situation, promotes the family to choose homes that are outside the community, and does not provide the environment to promote social cohesion and reflect on the added impact individual decisions have on the community.

43. Recognize self-construction as a legitimate way to rebuild and repair. There will be a gap of people who will either not qualify or will not be willing to participate.

44. In our experience, working with economically disadvantaged communities like the CMP communities, the compliance required for the construction certification program will represent an obstacle and a lost opportunity to increment the resilience of non-compliance homes constructed by the residents who most support and assistance needs.

45. Existing construction standards as the guide for constructing hurricane resistant homes in Puerto Rico published by FEMA in 1989 with the approval of the CIAPR and the CAAPPR, could be used as the minimum standards to comply to the possible extent in the reconstruction of existing non-compliance structures.”

PRDOH Response: CDBG-DR housing investments are intended to make housing safe, secure, and sanitary and in order to do so, must have defined standards to ensure housing quality. The housing program does not include self-construction as an option at this time. PRDOH appreciates your comments on construction standards. Housing may be secured through a variety of mechanisms. ENLACE is encouraged to monitor the PRDOH website for procurement opportunities for housing construction.

Comment: #343_10-21-18_Mercedes Rivera Morales

“Since 1995, the government of Puerto Rico has established a public policy of wide citizen participation in the course of the revitalization and future development of Río Piedras. Law 75 of 1995, as amended, establishes clear processes for decision-making on actions that guide the development of our city. The groups created by this Trust for the development of Río Piedras, the Community and Corporate Urban Action Center, the Consultative Body for the Development of Río Piedras and the Interagency and Community Working Group for Río Piedras not only play a role of advising, promoting and facilitating their mandate, but also the role of directing them to operate specific projects to improve the quality of life and economic and cultural development of Río Piedras.

With the presentation of an Action Plan for Disaster Recovery, the public policy established in Law 75 is even more relevant. In this context, the active participation of the community groups of Law 75 is highly compatible with the policies established by the Department of Housing and Urban Development (HUD) and by the Federal Emergency Management Agency (FEMA). This novel situation in Río Piedras requires consultation with the community through the established mechanisms and the formation of an Action Group for the Recovery or Recovery Task Force for the Special Planning Area established in Law 75 of 1995.

The execution of both the local and federal public policy presents a great opportunity for the development of a unique collaboration model that will result in great benefits for the citizens of our city.

Post hurricane needs

In Río Piedras, several neighborhoods are made up of families whose housing was developed informally, and these families have incomes that place them at levels of poverty and are vulnerable populations, such as seniors, retirees and single women with children, and immigrants who are discriminated against to acquire homes. Through community action, the citizen leadership has documented the loss of roofs, either partially or totally, in five communities, namely Venezuela, Buen Consejo, Blondet and Capetillo. Details can be found in the table of Summary of findings of the Study of Infrastructure Impact Needs due to Hurricane María Río Piedras.

Summary of Findings Infrastructure Impact Assessment Hurricane María, R í o Piedras			
Neighborhood	Roof Damage	Partial Destruction	Total Destruction
Venezuela	29	25	25
Buen Consejo	5	39	69
Blondet	2	9	0
Capetillo	18	7	6

As part of community efforts 147 roofs and 2 entire houses have been repaired.

The availability of rental housing for low-income youth after Hurricane Maria was reduced. Structures in the urban center also suffered considerable damage, which required assistance to identify homes in areas far away from the urban center. On the other hand, the community-coordinated efforts to collaborate on more than 1,000 requests for financial assistance offered by FEMA; however, that aid did not translate into financial support because most were denied by

FEMA. Another population that is suffering from the need for shelter and services are the homeless people who find organizations in Río Piedras that support them with other services and food, but that their primary need is to have safe and adequate housing for their needs, since they are exposed to mental health problems.

To address the housing needs in Río Piedras, with significant damage to the communities and provide alternatives for the elderly, the youth, and the homeless, it is necessary to rehabilitate affected housing in the neighborhoods, develop new multifamily housing projects, and focus on the reuse of existing structures, housing for the elderly, and/or retired people; and dealing with abandoned properties and those that may be identified as public nuisances.

Infrastructure

In terms of infrastructure, the greatest challenges are public services and mobility. After Hurricane Maria, the communities faced plugged storm sewer systems, flooding of buried electric power systems in the urban areas which delayed the opening of businesses for 3 months, and poor night lighting, a situation that has created safety issues for residents and merchants. Also, illegal discharges are observed in the gorges and there is a lack of cleanliness, which caused flooding in the communities.

During the emergency, citizens faced the challenge of the lack of public transport on which a large part of the population depends. The mobility in the streets reflected an increase in the use of bicycles to perform daily tasks and transport to work centers. This makes it necessary to create mobility infrastructure such as bicycle paths, as well as connection improvements between the communities west of Ave. Muñoz Rivera and south of PR 3. The poor conditions of pedestrian crossings and sidewalks make them both dangerous. Both the crossings and the sidewalks are damaged by years of lack of maintenance, obstructions, or widths not suitable for walking or for the passage of people of functional diversity. In some places, they do not comply with current regulations. The connectivity of other transports with the TU is limited with 16 routes less than in 2015, scarce and inefficient.

Economic Development

Like all of Puerto Rico, Río Piedras needs to develop strategies to promote economic development. To this end it is crucial that better strategies to retain, attract and promote the return of commercial activity are coordinated, creating a favorable environment for new businesses, restoring buildings for mixed use and developing collaborative and conducive environments for people with business ideas that gives them access to capital and technical support to develop their business projects. Our community has a Trust for the Development of Río Piedras, with the ability to access and administer funds allowing for social and physical recovery post-Maria. We hope that the Trust will be able to participate directly in requesting funding from the CDBG-DR, without the need for intermediaries.

As previously explained, it is in our interest for a work plan to be drawn up in collaboration with the community leaders, who know first-hand the struggles and needs of this community and who are willing to work towards the recovery of their communities.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. The Social Interest Housing program provides dignified, resilient housing for vulnerable populations, like the homeless. PRDOH agrees regarding the importance of maximizing infill opportunities, and as result offers many rehabilitation options in its Action Plan.

Infrastructure projects may be eligible to receive assistance under the Critical Infrastructure Resilience, FEMA Coordination, or City Revitalization programs.

PRDOH understands that economic revitalization is essential to a comprehensive recovery for Puerto Rico. The Action Plan offers several economic development programs. No program in the Action Plan is geographically restricted within Puerto Rico; residents of Río Piedras may be eligible to receive assistance.

PRDOH values collaboration with community groups and looks forward to a continued positive working relationship with them throughout the life of the grant.

Comment: #344_10-21-18_Estudiantes de Derecho UPR

The comment submitted describes Estudiantes de Derecho (Pro Bono) as a group of law students “committed to ensuring that people, especially vulnerable sectors, have a voice and can be participants in the different democratic processes that occur in Puerto Rico.” The comments outlines some of the work the group has done in the wake of Hurricane Maria, including assisting people in making complaints against FEMA, and notes a general lack of citizen participation in the overall recovery process, not just CDBG-DR. The document also outlines the following specific commentary regarding the Action Plan.

“CDBG-DR funds are supposed to an economic mechanism directed towards addressing the identified needs of affected communities to contribute to their recovery. As such, the first issue is it has become urgent to identify vulnerable communities that should be attended to with priority. How do should we identify these communities?”

In accordance with the Federal Housing Department, the CDBG-DR funds are limited resources to be used based on a “thorough analysis of unmet needs and your agency’s strategic priorities.” It follows that in order to analyze these needs we must rely on effective participatory mechanisms. Communication is a key tool in ensuring that we attend to these needs. Government agencies must be sure to set aside enough time, more than 30 days, to allow communities to discuss, analyze and communicate their respective feelings and proposals. In these situations, non-governmental organizations are key, including community organizations, community work groups, non-profits, and others.

Beyond considering communication with the communities as a fundamental aspect of this process, we believe that it is imperative to clearly establish which criteria are to be used to

determine which communities are “vulnerable” and what needs have arisen. The clarification of these criteria will go a long way towards facilitating communication with the communities and all those entities which seek to protect their best interests. Once they know the specific criteria, the communities and those entities with influence will be able to prepare themselves to present the relevant information. This will also permit the necessary discussions to take place should there be issues with these criteria. Establishing criteria will prevent arbitrary or inconsistent selections which would make the process unfair and inadequate for addressing those exact needs which these funds seek to address. Furthermore, the diversity of community needs must be taken into account. So that the criteria respond promptly to these needs, it is even more important that effective communication with the communities is actively cultivated, as they know their own needs best.”

PRDOH Response: PRDOH agrees that recovery is most successful when communities are involved. The Action Plan was informed by input from hundreds of stakeholders, including community groups. The public comment period for the substantial amendment to the Action Plan, including the public hearing process was open to the public and resulted in a wealth of information exchanged. Hundreds of submittals from the public were received. Although each proposal may not have been referred to by name in the Action Plan, all submittals have been reviewed carefully by PRDOH and were considered in the development of the plan. Notification of public hearings was advertised on social media, in the newspaper, and in circulated newsletters, in addition to being posted on the PRDOH website, www.cdbg-dr.pr.gov.

“Likewise, we are concerned that the starting point for evaluating the needs which have arisen due to Hurricane Maria is to be the data provided by FEMA. Although it is important, it is insufficient when it comes to deciding and seeking ways of addressing the communities’ needs. We thus stress the fundamental nature of communication with those communities. After the hurricane, community censuses were taken to quantify important data such as the number of elderly and bed-ridden people, among other pressing needs. We have asked the Pro Bono team to take into account alternate methods of collecting data, such as community censuses, to determine the needs which have arisen in the communities. This also guarantees the real, effective participation of the communities in the process of determining the needs to be addressed.”

PRDOH Response: FEMA data is one of many data sets consulted during development of the unmet needs assessment. Please consult the appendices of the Action Plan for a complete list of data sources used. As required by HUD, PRDOH used the best available data in the evaluation of unmet needs.

“What issues have we identified in the process of citizen participation?”

The biggest issues identified in the process of selecting communities to be included in the various housing, infrastructure, and economic revitalization programs are lack of transparency, communication, and equal access for the diverse range of stakeholders participating.

Regarding the first point, transparency, the process of how the different programs were created have not been broadly open to the different social groups who will experience the direct effects of the implementation of those programs. Furthermore, through a process which has not been entirely divulged, a non-profit organization was chosen to lead the community selection and planning of the funds and programs which were submitted to the Federal Housing Department. During this process, the organization Foundation for Puerto Rico was publicly known to have received an allocation of millions of dollars. Nevertheless, there has not been enough information or transparency to demonstrate the process, or rather auction, nor the criteria to be followed, among other factors and mechanisms demonstrating that a fair selection process took place.

Thus, the factor of communication goes beyond the worrying reality of the fact that the communities did not have the necessary access to the forums which would have allowed them to participate. The investment of this amount of money from the CDBG-DR should ensure an economic development consistent with the reality expressed by the communities. One of our concerns about these results from the desire to invest in the so-called tourist economy.

This economic model provides certain economic incentives to promote foreign investment thorough tourism. The main problem which has been discussed in various communities, recently in the town of Loiza for example, is the displacement of communities to make room for the infrastructure which comes along with this economic model.

Furthermore, these concerns are well-founded, as in the presentations given by the various municipalities during the public hearings held on the occasion of the first allocation of funds the displacement of communities was considered. Although they were not mentioned explicitly, projects existed in locations where communities currently live. Some community leaders and residents have claimed that they were not consulted regarding these possible displacements. As far as Puerto Rico's recovery goes, these displacement plans will be even more harmful to these communities. In addition to having to cope with the destruction caused by Hurricane Maria, we will have to face that which arises in the wake of displacement.

During this recovery process it is crucial that displacement is not the first option for assisting these communities. These funds are also supposed to anticipate issues with aid, which means they would be wise to seek alternatives so that people are able to remain in their communities. Furthermore, they should not be considering displacements without the consent of the people to be displaced, without major attempts at relief and without functional plans for temporary housing and a dignified relocation which is sensitive to these peoples' needs. They are attacking these peoples' rights and their effective participation in the process. These are crucial considerations, especially when we take into account that the course of action taken with these funds will substantially influence Puerto Rico's economic development. It is vital to interrogate the model which often goes along with displacement, especially in vulnerable areas.

This displacement will contribute further to the increasing depopulation of areas which were not able to fully recover from the Hurricane's destruction and where people had to leave their homes. For that matter, what economic development can take place on the basis of the social and economic instability of the communities to be displaced? This question must be asked through ongoing and effective dialog with the communities, while searching for alternative means of

development which promote a local economy, which has greater long-term benefits for our communities and for Puerto Rico.

Finally, these disagreements and concerns are rooted in the issue of access. For example, the economic model of tourism: Although we do not feel it is completely misguided, we understand that it cannot be the single method applied in Puerto Rico. Furthermore, there exist proposals for sustainable and community development which, for lack of access to the decision-making spaces, have not managed to be taken into consideration. Reclaiming fair access comes from a need for non-profit organizations to be allowed to participate, likewise different community leaders, cross-sectorial working groups, community organizations, and leaders of school communities among other sectors which have taken initiative to resolve the issues which they have identified from their respective perspectives.”

PRDOH Response: All relocation options outlined in the Action Plan are completely voluntary. PRDOH agrees that planning works best when it is community driven and has designed programs such as the Whole Community Resilience Planning with those considerations in mind.

The Whole Community Resilience Planning program offers an opportunity for communities to create long-term plans for thoughtful and resilient community-wide recovery.

Specific project locations for economic development programs in the Action Plan have not yet been identified. PRDOH cannot be sure which communities the commenter fears will be displaced but reiterates that only voluntary relocation is included in the Action Plan.

“How are access and participation affected when there are language barriers?

The CDGB-DR Allocation Notices published in the Federal Register contain instructions, guidelines, and general regulations about the administrative processes for these funds. In other words, these Allocation Notices constitute the key rules that govern the CDGB-DR funds. Knowing these rules will allow the general public to oversee the Puerto Rico Department of Housing’s compliance with administration and use of these funds.

However, the first Federal Allocation Notice of CDGB-DR funds was published only in English. At this time, we do not know the availability of a Spanish version. One consequence of this is the exclusion of thousands of people in Puerto Rico and is a discriminatory practice, since the primary language is Spanish. This impedes effective oversight, participation, and access to the CDGB-DR funds, funds which will have a significant impact on the recovery and development of thousands of communities in Puerto Rico.”

We recognize the availability of a condensed version translated into Spanish of the second Federal Allocation Notice of CDGB-DR funds on the Puerto Rico Department of Housing’s website. Nevertheless, we reiterate that all Allocation Notices, as well as all supplemental and educational materials, should be available in Spanish. Likewise, the content of the second Federal Allocation Notices of CDGB-DR funds translated to Spanish should be available in its entirety.”

PRDOH Response: PRDOH has requested a Spanish version of the first Federal Register Notice from HUD.

“How will effective participatory mechanisms have positive results in the administration and use of CDGB-DR funds?”

Although we recognize the existence of the Citizen Participation Plan published by the Puerto Rico Department of Housing, it is crucial to integrate additional participatory mechanisms, particularly in design, planning, implementation, oversight, and other processes. In light of a plan that will impact the lives of hundreds of thousands of people and families in Puerto Rico, it is essential to promote mechanisms and controls that guarantee proper use of these funds to which they should be destined: a dignified long-term recovery.

Various social science studies have pointed out that the higher the level of participation and involvement is, the lower the level of corruption is. With participation, not only are the results important, but rather the processes and the manner in which decisions are taken lead to better outcomes, because those that are directly affected provide information that often escapes the attention of technicians and government administrators.

Effective participation allows the creation of democratic structures in which not only those that participate play a role in their own development, but it also supports efficient government management. That is to say that it requires proper use of funds, it avoids public spending on non-priority items for a dignified recovery, it promotes transparency and accountability, and it avoids constant changes of plans, projects, or policies because the community is consulted from the beginning.

To contribute to processes, to introduce modifications and participate on an equal basis in making relevant decisions with respect to proper management with the persons responsible for administering the funds, we propose that the Puerto Rico Department of Housing includes guarantees of participation at different stages of the planning and implementation of the funds in its Plan of Action.

Furthermore, we recommend that through an administrative order and/or regulation that the Housing Department adopts structures and mechanisms of citizen participation in the administration and use of CDBG-DR funds. Structures such as regional community committees, advisory committees (that include representatives from vulnerable sectors and community leaders), interdisciplinary work groups, among others that can be adopted. Likewise, for example, they would be able to hold regular meetings, community assemblies, neighborhood consultations, etc. The scope of involvement can be established at different stages of the administration of these funds. Namely (1) design criteria, (2) development of requests for proposal or RFPs, (3) selection processes, (4) needs assessment, among others.

Conclusion

It is of vital importance that communication is encouraged with the communities, that specific criteria of the selection process is disclosed as early as possible (those used to identify community vulnerabilities and needs as well as those used by Foundation for Puerto Rico to manage funds), that transparency is guaranteed throughout the entire process, and that equal access is guaranteed to persons as much in the public hearings as in whichever other space in which decisions are taken that affect the respective communities. It is imperative that communities are actively included in the decision-making processes of programs aimed at recovery and

reconstruction to meet the CDBG-DR's own objectives. Thus, we urge that you adopt the previous recommendations as well as those brought by the communities and organizations that have worked personally with the communities during this process."

PRDOH Response: Thank you for your suggestions. PRDOH values the participation of communities and interested stakeholders throughout the life of the grant. PRDOH is committed to leading a responsible and transparent recovery effort. As required by 83 FR 5844, PRDOH must post information related to its CDBG-DR Grant to its website for public consumption. Information including procurement policies, contracts, Quarterly Performance Reports (QPR), expenditures, program policies and procedures, and other related information will be posted to PRDOH's disaster recovery website at www.cdbg-dr.pr.gov as it becomes available.

Comment: #345_10-21-18_Carmen Aponte-Ayala (Academia Puertorriqueña de Jurisprudencia y Legislación)

"Background

The Housing Department, under the Further Additional Supplemental Appropriations for Disaster Relief Act of 2018, passed the 9th of February of 2018 (Pub. L. 115-123)(Appropriations Bill), has allocations for attending to unmet disaster recovery needs through authorized activities under Title 1 of The Housing and Community Development Act of 1974 related to disaster relief, long-term recovery, economic revitalization and mitigation in the areas most impacted and affected by the disaster caused by Hurricane Maria in 2017.

It establishes the Community Development Block Grant Disaster Recovery Action Plan (CDBG-DR) block grant for the Central Office for Recovery, Reconstruction and Resiliency (COR3) with the objective to foster citizen participation to provide all residents of Puerto Rico the opportunity to participate in the planning of the development of this program.

At the same time, with citizen participation it creates programs and will create more programs to take advantage of this allocation of funds and through this allocation (CDBG-DR) Puerto Rico has the responsibility to utilize them to attain our recovery.

Among these programs planned in the Office of the Sub-Secretary of Community Planning and Development, through the Infrastructure Plan, is the one in which I will concentrate through the Public Assistance Program (CDFA Number 97.036). I consider that through this program we can solicit financial resources for unmet and unsatisfactory needs from the head office. FEMA provides supplementary assistance with federal subsidies for disasters, specifically repair, replacement or restoration of public facilities and the facilities of certain non-profit organizations affected by the disaster. This program also fosters the protection of these facilities from future events providing assistance through risk mitigation measures during the recovery process.

For the moment, I consider getting involved by e-mail through the website, giving our opinion on the substantive amendment to the Draft Action Plan is the information that El Hage provided us through the engineer Ivelisse. We cannot request funds at this stage according to his structures. It is very important to remember the Citizen Participation Plan of the Housing Department, as

part of the Plan of Action, will continue being updated over time as the next programs are developed. No one can request funds at this stage because no one even knows what programs there will be. Public hearings ended Friday the 19th of 2018. They will use the information from public hearings and comments sent by email to prepare the Final Action Plan. In addition, public comments are and will be welcome during the duration of CDBG-DR program.

On the other hand, speaking personally with the staff of the Central Office for Recovery, Reconstruction and Resilience, they directed me to submit a comment with respect to the draft that they submitted to the amendment to the Draft Action Plan. Moreover, that these comments and proposed comments that include or eliminate the draft will be considered and responded to by the draft of the Substantial Amendment of the Plan of Action that will be submitted on or before the 18th of November before HUD.

In addition, they told me that the final programs to be included and for soliciting funds will at soonest be in January 2019 when they will have already collected the input of Citizen Participation. I will continue monitoring.

E-mail comments will be received until today at 11:59 p.m.

I would argue:

1. that the Citizen Participation program is excellent because beyond the public hearings the public can submit comments via e-mail. It allows access so that more people participate.
2. that upon including the Infrastructure program through the Public Assistance program, FEMA provides supplementary assistance with federal subsidies for disasters, specifically repair, replacement or restoration of public facilities and the facilities of certain non-profit organizations affected by the disaster. This program also fosters the protection of these facilities from future events providing assistance through risk mitigation measures during the recovery process.”

PRDOH Response: Thank you for your comment. The public comment period for the substantial amendment to the Action Plan, including the public hearing process was open to the public and resulted in a wealth of information exchanged. Hundreds of submittals from the public were received. Although each proposal may not have been referred to by name in the Action Plan, all submittals have been reviewed carefully by PRDOH and were considered in the development of the plan.

Comment: #346_10-21-18_Cynthia Burgos López (La Maraña)

The following is a summary of the comments submitted by La Maraña. The attachment also enclosed a proposal and detailed information relating to the Imagination Post-María Pilot Program and the organization itself.

La Maraña, a non-profit organization for community design and planning, whose mission is to strengthen and prompt the transition of cities to habitable, participatory and sustainable areas, submits the following comments on the Draft Action Plan. The comments have been submitted

with careful consideration and understanding of urban planning and citizen participation, both areas in which they are versed and operate in daily, as well as an openness for collaboration, with hopes that this plan will provide the tools to develop a more resilient and sustainable PR in the long term. The following comments have thus been submitted:

- *Planning processes must be crafted with resilience and the participation of the citizens in the community, as well as with a consideration for climate change, clean energy, inclusive public places, green infrastructure, rehabilitation of abandoned places, management strategies, tropical context and social reality of Puerto Rico.*
- *Planning strategies should consider existing resources that include abandoned homes and spaces, including 326,435 abandoned homes approximately, 25% of PR homes, (Caraquillo, 2015), that could potentially be rehabilitated before the proposed 18.5 million in program funds is used to build new properties.*
- *La Maraña developed Imagination Post-María, a pilot project, currently implemented in 5 communities and 3 municipalities – Comerío, Carolina, Humacao. This project was created under the strategic framework and ideal of just recovery, dealing directly with issues of fair and decent housing, real and effective participation in planning and development processes, remaining habitable, to proposes and decide on one’s future, equal treatment, and a healthy living environment for citizens and the community. Through the implementation of this project, real community needs and problems with rehab and revitalization were identified, however the Draft Action plan, does not echo the real needs that exist in the communities nor does it pose a real and effective solution to the problems at the country level. Enclosed with this commentary is a detailed explanation of how Imagination Post-María identified and addressed these.*

Required Actions:

Whole Community Resilience Planning

- *Include entities whose vision will be focused on local economic development as well as including projects that have a positive social impact on community residents.*
- *Currently proposed entities and administrators include DV and FPR, more entities with strong planning experience need to be considered and proper respect given to the citizens human rights, vulnerabilities, civil, political, economic, social, cultural and environmental rights, that are already regulated. Additionally, the current Action Plan suggests that Puerto Rico will be developed under the visitors economy encouraging the displacement of the inhabitants here. Leaving the development, design and rebuilding to those from the north and with current entities in place, there will be no space for those who love and live in this country every day and leave us struggling for a decent future.*

Planning Processes

- *There has already been a widespread effort and strengthening of efforts for the existing community development in many communities spanning the island, these efforts should be leveraged, most specifically, the data gathered and valid solutions already established, would make the planning process outlined in the Action Plan more inclusive and effective.*

Establish clear criteria for the following:

- *The selection of non-profit organization that are looking to integrate into the facilitation of these processes and fair use of these funds, promoting transparency and inclusion to those organization who have been devoted to this line of work.*
- *Transparency must be at the basis of all development and ANY organization that is involved in the development and it must be confirmed and evident that those involved with these public and private partnerships have the tools and expertise needed for such a large feat. All non-profits that possess those tools and expertise should have EQUAL opportunity and access to be included.*
- *The selection of communities that will have access to funds, processes, and opportunities of these plans for those communities that have high unemployment rates, high levels of poverty, problems with health, environmental issues, large number of abandoned properties, the most vulnerable as well as risk, discrimination, inequity, and lack of basic infrastructure, all of which need to be attended to with haste.*

Be more specific and increase focus on the following:

- *Add specifics to the planning language how mobility, resilience, green infrastructure, natural resource management, renewable energy, abandoned structures, among others.*
- *Focus should be on repopulating urban centers, which has been a widely successful strategy for Puerto Rico, more specifically it benefits the inhabitants, environment, and a practical use of funds. By not including this in strategies, climate effects will be stronger, and it will be most felt by those most vulnerable.*
- *Consider that the spatial development toward the outskirts of urban centers has increases negative environmental repercussions which would most significantly impact the most vulnerable.*
- *Focus on integration of non-profit partners, experienced organizations and professionals, that can assist with proactive planning to update the current future and long-term urban vision holistically, addressing the need for alternate modes of transportation and green infrastructure that will create different platforms that contribute to a future-proof, conscious, sustainable, dignified and resilient Puerto Rico.”*

PRDOH Response: PRDOH agrees that planning works best when it is community driven and involves municipalities and the Planning Board and has designed programs such as the Whole Community Resilience Planning with those considerations in mind.

PRDOH appreciates your feedback and will take these suggestions into consideration during further development of the Whole Community Resilience Planning program guidelines. It is anticipated that these guidelines will be publicly available in the first quarter of 2019.

PRDOH is committed to leading a responsible and transparent recovery effort. As required by 83 FR 5844, PRDOH must post information related to its CDBG-DR Grant to its website for public consumption. Information including procurement policies, contracts, Quarterly

Performance Reports (QPR), expenditures, program policies and procedures, and other related information will be posted to PRDOH's disaster recovery website at www.cdbg-dr.pr.gov as it becomes available.

Comment: #347_10-21-18_Edwin Soto Santiago (Marías)

Summary: Recommendations:

- *Other sources of energy are identified so during catastrophic events, power service is uninterrupted. Specifically, we are recommending that solar panels be installed throughout our municipality and this source of energy is taken into serious consideration for implementation across the island.*
- *Assistance be provided for rehabilitation projects in this municipality to address the need for basic housing as well as the growing homeless population. We must offer those that are the most vulnerable, including our children, elderly, and farmers with proper and adequate housing, where they no longer need to risk their lives daily.*
- *Employment opportunities and special consideration to the people of Las Marias due to the small population of employers, the offerings are slim and causing intelligent youth to migrate elsewhere for other opportunities, further dimming the future outlook for growth and opportunity. We ask that factories and businesses are incentivized to open and run in Las Marias*
- *Increased focus and assistance with infrastructure and addressing of road, sidewalks and bridge issues, as well as areas of public recreation sites. We also ask for assistance in developing a museum like cultural center for Las Marias.*

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. The Social Interest Housing program provides dignified, resilient housing for vulnerable populations, like the homeless.

Infrastructure projects may be eligible to receive assistance under the Critical Infrastructure Resilience, FEMA Coordination, or City Revitalization programs.

PRDOH understands that economic revitalization is essential to a comprehensive recovery for Puerto Rico. The Action Plan offers several economic development programs. No program in the Action Plan is geographically restricted within Puerto Rico; residents of Las Marías may be eligible to receive assistance.

PRDOH values collaboration with community groups and looks forward to a continued positive working relationship with them throughout the life of the grant.

Comment: #348_10-21-18_Ramfis Javier Perez Rivera (LCS Housing Corp.)

Summary: LCS Housing Corp. Submitted a comment which included requests for funding for the three projects outlined below.

“ I- POST MARIA P.T.S. RECOVERY PROGRAM – Referring to the included proposal. Estimated Cost \$500,000.00

II- URBAN GURABO - The Municipality of Gurabo has endorsed the organization LUCHA™ to construct a multifamily housing development for families who are homeless as a result of Hurricanes Irma and Maria, prioritizing women who are survivors of domestic violence. The project will be built on land belonging to the Municipality. The construction of facilities promoting economic development including incubator spaces for micro-businesses as well as offices and other types of commerce has also been proposed. Work is currently being done on the conceptual design as well as the corresponding cost estimates. There are plans to use 4% low-income housing tax credits and CBDG-DR funds

III- GREEN CULEBRA - Currently, the organization is interested in building hydroponics greenhouses on at least three acres of land for the purposes of economic development, job creation and agriculture. Estimated Cost- \$2,500,000.00

IV- GOLDEN PONCE - The Autonomous Municipality of Ponce endorsed the organization Lucha Contra el Sida, inc. [Fight Against AIDS, inc.] to undertake two projects. The first for people experiencing homelessness and the second for elderly people. The estimated cost of the two projects is: \$33,000,000.00. The funding sources are the 4% tax credits and CBDG-DR funds.”

PRDOH Response: The CDBG-DR Gap to Low Income Housing Tax Credit program offers interim financing and gap funding for low income housing tax credit housing projects. Further information regarding this program will be published as part of program guidelines.

Infrastructure projects may be eligible to receive assistance under the Critical Infrastructure Resilience, FEMA Coordination, or City Revitalization programs.

Comment: #349_10-21-18_ Griselle Bermúdez García (Legislador Municipal, Municipio Autónomo de Toa Baja)

The following Ponencia was received from Sra. Griselle Bermúdez García, Municipal Legislator, Toa Baja and content is summarized as follows:

Toa Baja is one of the most affected municipalities and needs the following assistance to continue:

- *Debris cleanup*
- *Housing repairs*
- *Paving of roads*
- *Restoration of power services*
- *Street lighting*
- *Security*

Post Maria, many residents began the rehabilitation of their residences, which imposed many additional costs which significantly raise difficulties to those trying to recover, including the following:

- *Permits to ensure that construction complies with the law*
- *Certification of design plans by a professional and licensed engineer*

The costs associated with these, those necessary, are exceeding the economic capacity of the residents, just trying to re-establish basic housing needs, crippling the residents monetarily and causing construction to continue outside of the law. These costly enforcements are leaving residents with no choice but to rehabilitate to the best of their ability, rising the amount of homes built outside of code, lessening the protection from another disaster.

It is recommended that there are uniform post-disaster codes established and free assistance to residents for the certification of improvements, design improvements, reduction and subsidy in municipal taxes, to lessen the financial burden on already struggling citizens trying to recover and move on.

PRDOH Response: Thank you for your comments. The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #350_10-19-18_Carlos Alberto Velázquez (ESPuR)

Summary: Carlos Alberto Velázquez, environmental manager at ESPuR, submitted a whitepaper including the recommendation of using CDBG-DR funding to provide alternative energy sources via nanogrids and microgrids, that would work parallel to that provided by the Puerto Rico Electric Power Authority, to remote communities in need. The community microgrids have been conceptualized, put into practice in the San Salvador community, and ready to be studied for consideration for the planning and energy efficiency funds under CDBG-DR.

PRDOH Response: PRDOH understands the need for alternative energy sources on the island. These suggestions and recommendations have informed PRDOH during the development of the Infrastructure programs outlined in the Action Plan. PRDOH understands that recovery is multi-faceted and is committed to administering a collaborative, transparent recovery.

Comment: #351_10-19-18_Jean C. Rivera Álvarez (Empresas Agrícolas Isaelis, Inc.)

Summary: President of Empresas Agrícolas Isaelis, Inc., submitted a whitepaper including the effects of Hurricane María on the availability of food and a proposed use of CDBG-DR funding for a project.

Economic Recovery funds requested: \$1,250,000.00

- *Construction of a local food processing plant equipped with solar panel energy and water well systems.*

PRDOH Response: The Re-Grow PR Urban-Rural Agriculture program outlined in the Action Plan may provide assistance to urban or rural, large- or small-scale agriculture, livestock or aquaculture installations. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #352_10-19-18_Ruset M. Rosa Torres (Calidad de Vida para las Comunidades de Demajagua y Machos)

Summary: Founder of Calidad de Vida para las Comunidades de Demajagua y Machos, submitted a proposal titled “Propuesta: Desarrollo Social Comunitario” which addressed community needs and recommended activities for such in the following areas:

Housing:

- *Reconstruction of housing. Requesting \$25,000.00 maximum per participant with less than \$35,000 gross income.*
- *Acquisition of solar panels. Requesting \$25,000.00 per household.*

Infrastructure:

- *Reconstruction of businesses. Requesting \$35,000.00 maximum per community business owner.*
- *Improvements to highways, roads, and street signage. Requesting \$1,000,000.00-\$2,000,000.00 per community.*

Economic Recovery:

- *Development of local businesses.*
- *Development of community labor force.*
- *Provide educational and vocational programs to assist small business creation. Requested \$10,000.00 for startup.*

Other:

- *Incorporate recycling programs.*
- *Maintenance of common areas and green areas program.*
- *Medical equipment program benefiting senior citizens. Requesting \$1,500.00 per person.*
- *Occupational and speech therapy program. Requesting \$1,000.00 per person.*
- *Security officer program. Requesting \$1,000.00-\$1,500.00 per officer.*
- *Youth program funds for education, occupational therapy, school supplies and materials, scholarships. Requesting \$10,000.00 per child per year.*

- *Creation of community food bank program. Requesting \$25,000.00-\$75,000.00 monthly or annually.*

PRDOH Response: These suggestions and projects proposed have informed PRDOH during the development of the Housing, Economic Recovery, Infrastructure, and Multi-Sector programs. Currently available information regarding these programs is outlined in the Action Plan. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #353_10-21-18_Gibette Torres Tellado

"... FEMA only assigned me \$320 dollars to repair my home, but obviously, that amount was not enough to make the repairs. Your Home Reborn recently helped me with the roof, gave a small new fridge and microwave, but there are still some things they don't cover. The gentleman who came today, October 22nd, 2018, to inspect the work performed by Your Home Reborn last week told me that I could ask you for help. Well, I would like to know how to ask for help. Thank you!"

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. Information regarding how to apply will be published at www.cdbg-dr.pr.gov, as part of program guidelines, when available.

Comment: #354_10-19-18_Lornna J. Soto Villanueva (Municipio de Canóvanas)

Summary: Mayor of the municipio of Canóvanas, submitted a proposal titled "Comentarios a las Enmiendas Sustanciales al Plan de Acción CDBG-DR" which elaborated on the effects of hurricane María, the current conditions of the municipio, and a list of activities to be considered for CDBG-DR funding.

Housing Funding Requested: \$16,000,000.00

- *Rehabilitation of housing inspected by the community.*
- *Acquisition and installation of solar panels and water heaters for households.*

Infrastructure Funding Requested: \$1,775,000,000.00

- *Reconstruction of critical infrastructure such as bridges, highways and community elements.*
- *Construction of a drainage system to mitigate flooding.*
- *Construction of community resilience centers.*
- *Coordination with FEMA to develop mitigation strategies.*

Economic Recovery Funding Requested: \$155,000,000.00

- *Incorporation of small business incubators and accelerators into the communities.*
- *Organization of a workforce training program geared towards construction, tourism, and the hotel industries.*
- *Inclusion of urban-rural agriculture program.*

Planning Funding Requested: \$55,000,000.00

- *Incorporation of whole community resilience planning.*

Multi-Sector Funding Requested: \$1,200,000,000.00

- *Reconstruction of buildings in the downtown area.*
- *Relocation of electricity cables underground.*
- *Reconstruction of sidewalks.*

PRDOH Response: These suggestions and projects proposed have informed PRDOH during the development of the Planning, Housing, Economic Recovery, Infrastructure, and Multi-Sector programs. Currently available information regarding these programs is outlined in the Action Plan. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #355_10-17-18_Manuel Gonzalez Figueroa (Rincón X Rincón)

Summary: Manuel Gonzalez Figueroa submitted a whitepaper which explained the mission of Rincón X Rincón and the use of CDBG-DR funding to be utilized for the following:

- *Mitigation of erosion of the coast of Rincón.*

PRDOH Response: Thank you for your comment. Economic Development programs outlined in the Action Plan which outline opportunities to transform the economic landscape of the Puerto Rico.

Comment: #356_10-19-18_Feliciano Rodríguez Domínguez

Summary: Reverend Feliciano Rodríguez Domínguez submitted a whitepaper that included the effects of hurricane María on the San Salvador community, the community's response to that time of need and a request for CDBG-DR funding to be utilized for a project. The activity to be funded is:

- *The implementation of microgrids in the San Salvador community as a stable source of alternative energy.*

PRDOH Response: PRDOH understands the need for alternative energy sources on the island. These suggestions and recommendations have informed PRDOH during the development of the Infrastructure programs outlined in the Action Plan. PRDOH

understands that recovery is multi-faceted and is committed to administering a collaborative, transparent recovery.

Comment: #357_10-15-18_Edwin García Feliciano (Municipio de Camuy)

Summary: Edwin García Feliciano, mayor of the municipio of Camuy, submitted a whitepaper that provided twelve observations about the Action Plan draft. The observations are:

After further analysis the most important programs to the citizens of Camuy are

- *Critical Infrastructure Resilience Program*
- *CDBG-DR Gap to Low Income Housing Tax Credits (LIHTC)*
- *Small Business Financing*
- *Re-Grow PR Urban-Rural Agriculture*
- *Tourism & Business Marketing Program*
- *Community Resilience Centers*
- *Title Clearance Program*
- *The municipio of Camuy was in favor of the increase in budgeted amounts to the infrastructure and economic recovery components.*
- *For the City Revitalization initiatives, the municipio of Camuy believes each municipio should be able to recommend projects and be a recipient of funds.*
- *For the municipio of Camuy, the infrastructure reconstruction and improvement of water systems are crucial for both housing and business development.*
- *The municipio of Camuy, recommends allocating more funds to the Critical Infrastructure Resilience Programs.*
- *The importance of achieving the match on the funds for the programs and projects.*
- *The inclusion of senior citizen housing projects.*
- *The municipio of Camuy approves the inclusion of Community Resilience Centers in the Action Plan.*
- *The agricultural programs will be very important to the municipio of Camuy.*
- *The Title Clearance program is very important to all citizens who were unable to receive previous assistance.*
- *The inclusion of programs addressing dunes, sinkholes, weed controls, and home aids for senior citizens.*
- *The municipio of Camuy is available to contribute to the planning, program development and auditing of the CDBG-DR funds and programs.*

PRDOH Response: These needs and proposed projects have informed PRDOH during the development of the CDBG-DR programs outlined in the Action Plan. PRDOH values the participation of all municipios and looks forward to a working relationship at the municipal level throughout the life of the grant. Municipal projects, like some of those listed here, may be eligible to receive funding under some of the CDBG-DR programs. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #358_10-16-18_Lisandro Reyes (Municipio de Barceloneta)

Summary: Lisandro Reyes, the vice-mayor of the municipio of Barceloneta, submitted a proposal which included an impact needs assessment and the programs proposed for CDBG-DR funding.

Housing:

- *Acquisition of vacant or public nuisance houses.*
- *Relocation for families in high risk areas.*
- *Rehabilitation of households.*
- *Citizen participation in the mortgage catch-up program.*
- *Construction of senior citizen housing with LIHTC credits.*

Infrastructure:

- *Coordination with FEMA to develop flooding mitigation strategies.*
- *Construction of community resilience centers.*
- *Construction of retention ponds.*
- *Rehabilitation of the Fidel Santiago Amphitheatre as community resilience center.*

PRDOH Response: These needs and proposed projects have informed PRDOH during the development of the Home Repair, Reconstruction or Relocation Program, the FEMA Coordination program, Community Resilience Centers, the City Revitalization Program, and the Critical Infrastructure Resilience Program.

PRDOH values the participation of all municipios and looks forward to a working relationship at the municipal level throughout the life of the grant. Municipal projects, like some of those listed here, may be eligible to receive funding under some of the CDBG-DR programs. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #359_10-18-18_Michael Abid Quiñones Irizarry (Municipios de Utuado, Adjuntas, Jayuya, and Lares)

Summary: Michael Abid Quiñones Irizarry, a representative of the municipios of Utuado, Adjuntas, Jayuya and Lares, submitted a proposal which included activities to be funded by CDBG-DR and pictures of the related areas of need. The following activities are:

Housing Funding:

- *Reconstruction of houses in Utuado and Jayuya.*
- *Assistance in awarding titles to current residents.*

Infrastructure Funding Requested: \$80,000,000.00

- *Reconstruction of highways PR-140, PR-111, PR-123, PR-611, PR-10, PR-135, and PR-140.*
- *Construction of the Las Losas bridge between the municipio of Utuado and Lares.*

Other:

- *Creation of the Alliance of Faith Based Organizations to be recipients of CDBG-DR funding.*

PRDOH Response: These needs and proposed projects have informed PRDOH during the development of the Home Repair, Reconstruction or Relocation Program, which provides assistance for homes damaged by Hurricanes Irma and Maria, the Title Clearance Program which provides homeowners title clearance assistance, and the Infrastructure Programs. PRDOH values the participation of all municipios and looks forward to a working relationship at the municipal level throughout the life of the grant. Municipal projects, like some of those listed here, may be eligible to receive funding under some of the CDBG-DR programs. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #360_10-16-18_Miguel Ángel Rivera (Hospitales HIMA San Pablo)

Summary: Miguel Ángel Rivera submitted a whitepaper including the availability of the HIMA San Pablo hospitals after hurricanes Irma and María, demographics of the patients attended after the disaster, a list of specialized medical services provided by the hospitals and a solicitation for CDBG-DR funding to be utilized for economic revitalization of the hospital sector. The funding would assist in the remodeling, expanding, modernization, and refinancing of debt to strengthen the currently provided specialized services.

PRDOH Response: This project proposal has informed PRDOH during the development of Economic Development programs. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #361_10-19-18_Paola L. Santiago

Summary: Paola L. Santiago submitted a whitepaper elaborating on the lasting effects of hurricanes María and Irma alongside recommendations for CDBG-DR to be utilized. The recommendations are as follows:

- *A sustainable financial leveraging concept that addresses any and all unmet damage, mitigation, and pre-storm issues.*
- *Development and implementation of new creative approaches to recover and reconstruct incorporating demand generated employment and entrepreneurial opportunities for LMI persons.*
- *Incorporate additional affordable, efficient, strong, safe, clean and decent building options including modular residential options up to and including employee owned partnerships that provide a P3 initiative such that the economic multiplier can be sustained and benefit the Caribbean and South American countries as well.*
- *A Puerto Rican Resilience, Reconstruction, and Recovery Master Plan linked to a strategic implementation plan incorporating long-term plans for academia, students, NGO's, faith based, private and international communities.*

PRDOH Response: These comments, suggestions, and recommendations have informed PRDOH during the development of all CDBG-DR programs. PRDOH understands the challenges of finding safe and affordable housing and CDBG-DR funds will be used to repair or reconstruct the aging and fragile infrastructure. PRDOH understands that recovery is multi-faceted and is committed to administering a collaborative, transparent recovery.

Comment: #362_10-10-18_Marcos Cruz Molina (Municipio de Vega Baja)

Summary: Marcos Cruz Molina, mayor of Vega Baja, submitted a proposal including unmet needs, community impact from the effects of hurricane María, and projects to be funded under CDBG-DR. The proposal also stated that municipios should have a role in the use of the CDBG-DR funds administration and that the municipio of Vega Baja would be ready to assist.

Housing Funding:

- *Rehabilitation of housing.*
- *Acquisition of vacant or house for sale to be rented or sold to families in need.*
- *Relocation of families in flood zones.*
- *Mortgage and closing costs assistance.*

Infrastructure:

- *FEMA coordination to mitigate floods.*
- *Cleaning of bodies of water.*
- *Rehabilitation of highways PR-692, PR-686, and PR-22.*
- *Channelization of the river in the Brisas del Rosario community.*

PRDOH Response: These needs and proposed projects have informed PRDOH during the development of the Home Repair, Reconstruction or Relocation Program, which provides

assistance for homes damaged by Hurricanes Irma and Maria, the Mortgage Catch-up Program, which provides mortgage payment assistance, the Homebuyer Assistance program which provides closing costs assistance and down payment assistance, and the Infrastructure Programs which will consist of a whole community approach.

PRDOH values the participation of all municipios and looks forward to a working relationship at the municipal level throughout the life of the grant. Municipal projects, like some of those listed here, may be eligible to receive funding under some of the CDBG-DR programs. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #363_10-19-18_Wanda Trinidad Alejandro (Comunidad Organizada de San Salvador)

Summary: Wanda Trinidad Alejandro, a representative of Comunidad Organizada de San Salvador (COSS), submitted a proposal titled “Comunidad Organizada de San Salvador” which included project designs, municipal and community maps, and a project to be funded under CDBG-DR. The project presented in the proposal involves the development of solar powered microgrids, as a source of alternative energy, that is currently used in the San Salvador community today. The proposal states that the Comunidad Organizada de San Salvador sees this as an opportunity to bring clean and sustainable energy alternative to other mountainous or remote communities that have struggled with electricity issues.

PRDOH Response: PRDOH understands the need for alternative energy sources on the island. These suggestions and recommendations have informed PRDOH during the development of the Infrastructure programs outlined in the Action Plan. PRDOH understands that recovery is multi-faceted and is committed to administering a collaborative, transparent recovery. PRDOH values the participation of community-based organizations and looks forward to a working relationship at various levels throughout the life of the grant.

Comment: #364_10-19-18_Erika Ruiz (Enterprise Community Partners)

“Enterprise Community Partners, Inc. thanks Vivienda for their outreach efforts and online outlets that share information relating to the Action Plan and CDBG-DR. Based on the input from the community the follow comments are focused on resiliency, pre-development funding, inclusiveness and community engagement. The following comments are broken out by area and include page references as well as questions for clarification:

“ON CRITICAL INFRASTRUCTURE

p. 15: While the document mentions flooding, winds and rain as potential risks and hazards that could lead to future disasters in Puerto Rico, more specific language to address seismic tremors and fire in all mentions of risks and hazards would be more comprehensive

p. 179: Where the plan states it will support critical community infrastructure, to qualify its role and scope, we recommend the following: “infrastructure that will support communities and mitigate risk from natural hazards.”

p. 179: Consider allowing for non-grey infrastructure like parks for flood mitigation or green-scaping, which enable adaptation to local conditions. Most eligible activities are traditional large-scale “grey” infrastructure, which are high cost, require a lot of regulatory approval and may not be viable or feasible in many communities.”

PRDOH response: Thank you for the recommendations. PRDOH has clarified in the Action Plan that green-scraping infrastructure is allowed an encouraged as well.

“ON TITLE SUPPORT

The document represents a continued lack of clarity related to titling and property registration, and how that may or may not be related to “Informal Construction:”

p. 52: “Property title concerns” – property registry is not a requisite for construction or building to code. Nor is it related to the sub-heading: “High denial rates have left hundreds of thousands without critical assistance and a large unmet housing need.”

p. 146: The document states that title services are not available to individuals in a flood plain. This contradicts the goal of rehabilitation programs that would require a title to move forward. Housing owners would need to prove title and ownership to get federal assistance – this could have a damaging impact.”

PRDOH Response: Housing programs outlined in the Action Plan will permit the use of traditional and non-traditional methods of proving ownership for purposes of program eligibility, including the rehabilitation assistance made available to residents in the floodplain.

“ON METHOD OF DISTRIBUTION AND SELECTION CRITERIA

Non-profit organizations played a crucial role in responding to need after the hurricane and are in contact with the people and communities they serve. Non-profits should be able to play an important role and be able to access funds in the following programs mentioned in the CDBG-DR Plan:

- *Whole Community Resilience Planning.*
- *Home, Repair, Reconstruction, or Relocation Program*
- *Title Clearance Program*
- *Community Energy and Water Resilience Installation Program*
- *Multifamily Reconstruction. Repair and Resilience*
- *Construction and Commercial Revolving Fund*

Small Business Financing – Non-profits also need assistance in strengthening their administrative and operational capabilities to address need, they already are doing the work, but impact is

hindered by lack of funding. There should be a program, similar to this small business financing, that addresses critical capital needs to be able to recover and grow their organizations, create and retain jobs and meet triple bottom line goals that will further reconstruction.”

PRDOH response: Thank you for your comment. PRDOH will take these into consideration during further development of the referenced programs. Non-profit entities are eligible to apply for funding under several programs outlined in the Action Plan.

“Pre-development funding: a program should be designed to support non-profits housing developers carrying out SHF and multifamily development. These organizations need pre-development capital to get them to construction loan closing. A pre-development fund should be created to assist these organizations through this phase of development. Pre-development funds could be managed by FIDEVI or a similar organization that have experience in underwriting projects. CDBG-DR funds could be assigned as grants to these sub-recipients which would then structure pre-development loans to non-profit organizations.

- *For the sub-recipient distribution model and the partner distribution model, four criteria are mentioned, including “Meet all established performance goals.” These are not included in the action plan.*
- *p. 123: Selection criteria is of particular concern in the section on Whole Community Resilience Planning, which states that the Foundation for Puerto Rico has been selected to receive and administer \$55,000,000. Overall, what is the process to select partner organizations? Since there were no requests for proposals for this program and others that name a partner, a justification or methodology should be included as to how they were selected for full transparency.”*

PRDOH Response: Thank you for your comment. The Foundation for Puerto Rico is not the recipient of the funding. The Foundation for Puerto Rico is serving as the program implementation partner to manage the program and will coordinate resources to support communities as needed in plan development. Further detail will be provided in program guidelines to be published on the website.

“ON COMMUNITY PLANNING

pp. 111-12: The Planning Programs outlined make no reference to existing plans, such as the Puerto Rico Land Use Plan adopted in 2015, and no reference to Municipal Territorial Plans, which many municipalities adopt.

p. 112: The section on Municipal Planning does not specify who will carry out and implement activities of planning. Will PRDOH be the main implementation arm? If so, we recommend partnering with local CDCs and planning divisions on the ground and work within the framework of the Land Use Plan and Local Municipal Plans under the Planning Board. This is an opportunity to take a whole building approach to the effort. How will the municipal planning activities align with whole community resiliency plans explained further in this section?

p. 113:

Under the Whole Community Resilience Planning program, awards of up to \$20,000 may be distributed. This amount is far too limited to allow for serious community planning. This is not enough for a full-time staff member, which is what this effort will require, for a minimum of three years. Salaries should be commensurate with living wage, and it is important that there be a lead and an associate to help coordinate the planning.

Additionally, there should be a technical advisory consultant or team assigned to support staffers leading the community planning effort. Lastly, if there is a regional planning component, we recommend that there is appointed staff to lead this effort as well.

There is a mention in the document that some communities may receive up to \$500,000 through a competitive process. Please consider adding additional details to the description. What communities might be eligible? Who will guide the competitive process?

P.114:

Please consider the Planning Board as a partnering entity since they are eligible per the definition of partners in page 96 which identifies that partners are governmental agencies or governmental organizations. To foster local planning, these local planning efforts should be integrated or aligned with local municipal plans and the land use plan of Puerto Rico. We recommend that population and need be priorities for assignment of Whole Community Plan awards.

p. 175:

“HMGP funds will comply with FEMA resilience standard:” Ensure that FEMA has a resilience standard that fits the profile of Puerto Rico, particularly with eye toward housing vernacular and cultural sensitivities present in communities. It is important to ensure that communities are participating in defining that standard and invested in the solution. Additionally, it is important to define community “resilience” in accordance with community standards.

FEMA priorities should reflect priorities set forth by Reimagina, as well as other community-based planning projects.

p. 180: Community Resilience Centers are an excellent and comprehensive approach. We need to ensure that centers are retrofitted to withstand all hazards and wind loads at a Category 5 hurricane.”

PRDOH Response: The CDBG-DR programs seek to build upon past and ongoing community efforts, coordinate with other planning efforts, and will comply with Puerto Rican law and Federal requirements. The Planning Board will continue to be an important and valued partner in the Whole Community Resilience Planning. PRDOH agrees that planning works best when it is community driven and involves municipalities and the Planning Board.

“ON DISPLACEMENT

One of the overall program requirements is “Minimizing Displacement.” However, throughout the document, there are several contradictions related to mitigation, and a policy of displacement as the last option before new construction. On p. 101: “The programs as currently designed in the action plan are focused on moving families out of harm’s way.” See also the newly introduced

program for an international design competition, titled “Puerto Rico by Design,” destined for strategic areas devastated by the hurricanes.

ON HOUSING

Vacant Housing: Puerto Rico has a huge vacant commercial and residential property issue. This was the case before Hurricanes Irma and Maria, but it has worsened as many people have left the Island for the mainland for a variety of reasons. These vacant properties can be rehabilitated to provide much needed affordable housing and for new businesses that can help the local economy. While the various programs within the action plan reference rehabilitation of properties as eligible uses, there isn’t a clear program addressing vacant properties. The greater challenge is the identification and classification of vacant properties in order to activate them if appropriate. Inventory of vacant properties island wide and at the municipal level requires planning and strategy efforts with support from various state agencies.

ON RENTAL ASSISTANCE

While providing funding for Law 173 projects through the Rental Assistance Program is important and extremely helpful in assuring continuing operating subsidy so there aren’t additional seniors in unstable housing situations. Unfortunately, considering the high level of low income populations in Puerto Rico, rental subsidy is an essential resource to enable extremely low-income households to access housing. While utilizing the 4% LIHTC program for the production of housing is important, layering CDBG-DR funding in the form of rental subsidy can allow for additional funding leverage through increased debt capacity and serve the lowest income populations who don’t have many other options. Production of tax credit units without dedicated subsidy only addresses some of the affordable housing supply gap.

ON HOMEBUYER ASSISTANCE PROGRAM

This newly introduced program does not reflect how it will be integrated with other programs. • Will it be targeted toward individuals who must face displacement, including low-income families? • Is there data available that shows how first responders have suffered from housing loss and/or must relocate due to flooding? • Will it be programmatically tied into the policy of reusing vacant housing in the traditional urban centers? • Land Banking Strategies are not funded under the plan.”

PRDOH Response: Thank you for your recommendations. PRDOH agrees that the identification of and reuse of viable vacant properties should be maximized to the extent feasible and intends to actively incorporate the use of vacant properties so long as families choose to use them. PRDOH appreciates your questions regarding homebuyer assistance and will clarify information in the Action Plan before final submittal to HUD.

ON HOME RESILIENCE PROGRAM

Which department at university is administering this, and do they have the capacity to do so? Is it a cross-divisional team of engineering, planning and architecture?

Why is program limited to energy and load? It should include a holistic approach to building and utilizing state-of-the-art building science and efficiency principles that encourage efficient

building envelopes, siting of residential facilities and utilization of best practice methods in design and ventilation. Enterprise is developing a guide that should be considered as a precursor to the origination of this Guidebook.

Additionally, what other private sector and technical assistance (TA) partners will be brought in to support this effort? The university should consider creating an advisory committee of experts to inform the approach and tap resources at the federal agencies working in energy and efficiency, such as NREL and DOE. **ON HOME REPAIR PROGRAM**

Why are only single-family homes qualified? Multifamily housing should be qualifiable as well.

•*Priority groups recommended include single head of household, along with elderly, and individuals with medical needs.*

This program is only for substantially damaged housing. Setting aside funding for moderately damaged housing, which would be less than 50 percent of the value of the home repair, would also allow for significant home improvements.

Assessing homes will be a difficult task when homes are not built to code or are self-built. It is critical that teams be qualified to assess housing and that they possess a strong understanding of housing in Puerto Rico.

The program should also consider if a damaged home was not in the flood zone, but still experienced substantial damage. Maria was a large wind event, and this type of damage should be accounted for, as should precipitation.

Eligibility threshold for substantially damaged should be revised. If the repairs exceed \$60k, and the cost to make it livable again is \$70k, it makes more sense to do rehab than total reconstruction.

PRDOH Response: Thank you for your recommendations. PRDOH will work with the University of Puerto Rico to provide opportunities for collaboration and to build on the wealth of work already done to date regarding housing in Puerto Rico. Your comments are provided as part of the public record and will inform the program guidelines as they are developed. PRDOH has clarified that homes in need of repair yet exceed the repair threshold will be evaluated on a case-by-case basis or through feasibility analysis before converting to a Reconstruction.

HOUSING COUNSELING PROGRAM

Housing counseling should include counseling on home repair and fortification. Enterprise is working with partners throughout Puerto Rico, including Habitat for Humanity, PR Builders Association, University of Puerto Rico and a slate of other partners to develop guides and a training program that can be used to promote this effort. Enterprise launched a home resilience counseling program after Superstorm Sandy to provide owners of low- and moderate-income housing with guidance on repairs and scoping for rehab that would fortify homes. Enterprise will gladly share program details with the team.

PRDOH Response: PRDOH will gladly review information provided regarding opportunities to develop home fortification modules as part of the Housing Counseling Program. Please submit the guidelines to infoCDBG@vivienda.pr.gov

COMMUNITY ENERGY PROGRAM

- *Stipulate if solar thermal and solar electric are eligible for the program. It appears solar thermal is eligible, since there is recognition of hot water, but this is point is important to clarify.*
- *Will there be a need to pare other rehab programs with site to fix and repair roofs, so solar panels can be installed? Similarly, with water catchment – will there be a commensurate repair budget provided or pared with a rehab program? Is there potential for incentives through utilities to expand resource for families?*
- *Will there be a requirement to tie to grid or is there a stand-alone option for PV? o What is going to be considered eligible under the 6K rebate/grant for energy systems – will it be panels, invertors, batteries for the energy systems?*
- *What is going to be considered eligible under the 6K rebate/grant for water systems – will it include tanks, attachments, pumps, filtration devices and water efficient fixtures?*
- *The program should promote efficiency in concert with renewable energy deployment and ensure that each household has an efficient energy “grid” in place so that renewable energy resources can be maximized.*
- *How is the PPPE qualified to provide technical guidance on the program development? The program should consider bringing in DOE or other federal or local agency with technical expertise.*

PRDOH Response: PRDOH appreciates your questions regarding the Community Energy program and will clarify information in the Action Plan before submittal to HUD, and your questions are useful as the program guidelines are developed. The Puerto Rico State Office of Energy Policy has a close working relationship with the US Department of Energy through their administration of the Weatherization Program and will collaborate on program expertise, as well as with other local community and non-profit stakeholders with relevant expertise.

AGRICULTURE RESILIENCE

- *Promoting agricultural resilience and food security is an important step forward. It is also important to blend with farm-to-market opportunities and the ability to get locally sourced and grown produce to market, encouraging economic support for smaller farmers.*
- *Greenhouses can be resource- and structurally-intensive, particularly in urban areas. Consider conducting feasibility studies of this idea and continue to promote soil-based crops.*

REBUILD BY DESIGN

We commend Vivienda for embracing the model of design competition to foster best-in class thinking about keeping the island safe from future natural hazards and storm events, as was successful after Sandy.

- *Public engagement is a critical component to being able understand program impacts and get real time feedback on progress. Establishing a committee of various stakeholders and community groups that would serve as a resource of information and have ongoing engagement. In other communities impacted by disasters, these committees have been extremely helpful thought partners to CDBG-DR grantees.*
- *Citizens Advisory Council is an important idea that has been discussed by the Housing Department Secretary and should formally be included in the Action Plan and the Citizen Participation Plan. What will be its role? Who should participate? What will be the scope? How will members be appointed? All of these are questions to consider. Representative of different sectors like local Foundations, CHDOs, non-profit housing developers, industry associations, professional groups, financial institutions and community-based organizations should participate in the Council.*
- *p. 130: In the section on the Title Clearance Program, there is no detail as to a course of action, only a reference to Puerto Rico’s Recovery Plan HOU 12. This document and its details are not yet available. For such a critical program, it is recommended that more public hearings be held when such a document becomes available.*
- *P. 116: Again, there are no details provided on a course of action for “Agency Planning Initiatives,” which references six courses of action in the Recovery Plan.”*

PRDOH Response: Thank you for your comments and support of the Re-Grow Puerto Rico and Puerto Rico by Design initiatives. PRDOH is committed to a transparent and inclusive recovery process, which may include many additional opportunities for civic engagement throughout the programs. Your questions are helpful as additional engagement opportunities are considered. We have reviewed the Courses of Action for recommended alignments.

Comment: #365_10-19-18_Amárilis Pagán Jiménez (Proyecto Matria, Inc.)

Proyecto Matria, Inc. is a community-based organization founded in 2004 that is dedicated to providing temporary housing, permanent housing, business incubation, microcredit, community education and now, in addition, recovery after Hurricane Mary. They submitted comments to the Substantial Amendment to the Plan of Action for Puerto Rico published on September 21st, 2018 regarding the use of the funds of the Community Development Block Grant – Disaster Recovery (CDBG-DR).

“Before continuing with our comments on the Plan of Action (PA), we would like to express that Proyecto Matria endorses and incorporates into its comments the comments submitted by Legal Aid Puerto Rico (ALPR) 1 and the Puerto Rican Organization of Working Women (OPMT), that have been submitted separately.

We also highlight the following points because they seem important to us when evaluating the process of public hearings, comments and final approval of the Action Plan for Puerto Rico:”

“1. Citizen participation in public hearings

In the first phase of the process to prepare the plan, the government was not proactive or effective in the process of convening the public hearings required by law. The dates of the visits were limited, the participation turns were dominated by Municipalities and there was not a wide call, in Spanish and with enough time so that the people who will be impacted by the use of the funds could participate in them. This can be the basis for civil rights violations of people who live in communities at risk of being displaced or of people who might miss the opportunity to rebuild their homes and communities.

Although it is true that thanks to the work of Ayuda Legal Puerto Rico, the Community Participation Day CDBG-DR (which Matria was a part of) and Open Spaces was granted a longer comment period and the holding of new public hearings, but still there are things to improve. For example, the publication in Spanish of the final version of the Economic Recovery Plan and the formal and open call to set up an Independent Community Council, which monitors and influences the implementation of the Plan, guaranteeing sustained and long-term participation. Both actions are indispensable to guarantee a real citizen participation that exceeds the words of reports that use technicalities to claim compliance.

After Hurricane Maria, Proyecto Matria supported people from more than 20 municipalities around the Island and continues to be in contact with some of them. In our interaction with communities and people affected by Hurricane Maria we know that there is still a large part of the population facing problems with electricity, water, housing and even transportation. These circumstances limit their access to information and their ability to participate in public hearings outside their villages. We repeat that in order to guarantee real participation during the implementation of the Plan, it is imperative to continue holding public hearings in all the municipalities and to announce them in Spanish and in visible spaces for the communities.”

PRDOH Response: Thank you for your comments. PRDOH appreciates the community outreach and advocacy that Project Matria conducts across the twenty municipios, and for your input on the unmet needs you observe in the course of your work. PRDOH is committed to active public participation and is appreciative of your feedback on the extended comment period and multiple public hearings hosted by PRDOH during the Substantial Amendment process. Unfortunately, PRDOH does not have control over the Economic Recovery Plan for Puerto Rico publication or hearing processes as PRDOH is not the author of that plan. However, the public comment record is made available to key stakeholders in the recovery process.

“2. Access to information

We echo the requirement raised by other organizations to make public calls for proposals, contracts, subcontracts and other agreements that mediate between the Department of Housing and government or private entities for the management and allocation of CDBG-DR funds.”

PRDOH Response: Thank you for your comments. PRDOH is committed to leading a responsible and transparent recovery effort. As required by 83 FR 5844, PRDOH must post information related to its CDBG-DR Grant to its website for public consumption. Information including procurement policies, contracts, Quarterly Performance Reports (QPR), expenditures, program policies and procedures, and other related information will be posted to PRDOH's disaster recovery website at www.cdbg-dr.pr.gov as it becomes available.

"3. Data taken into consideration to create the Action Plan

The papers presented by the municipalities in the first round of views contained very few data that would reflect the reality of their inhabitants and request funds without clearly expressing the criteria required by the regulations applicable to the CDBG-DR funds.

We insist that data obtained through FEMA cannot be considered as reliable data either. It should be noted that in the papers that we reviewed from many municipalities, they made no effort to collect data from their communities. This type of effort was neither unreasonable nor burdensome if we consider that the communities are eager to collaborate in processes that generate support for their residents.

We give as an example the town of Comerío, one of three towns in which Matria was able to gather residents to evaluate data on damages and needs discovered. In the case of Comerío, with the support of Casa Juana Colón and the ICAR Project, a community census was completed that immediately gave us valuable information such as the following corresponding to Bo. Naranjo:

- *1,245 houses were partially damaged by Hurricane Maria.*
- *Only 500 received help*
- *They have about 85 people bedridden*
- *They have abandoned structures and vacant lots*
- *They have immigrants, with functional diversity and problematic use of controlled substances*
- *They lack constant electricity and water service*
- *The community suffered damage to infrastructure due to landslides*

In that same town, La Vuelta del Dos communities and Los Guaretos de Palomas sector informed us about the conditions of the houses in both sectors. According to one of its leaders, about 25% of the houses in those communities lost their roofs. This roof loss includes loss of belongings and a high level of anxiety and emotional damage. The Naranjo as well as Palomas neighborhoods require help with housing reconstruction, electric energy and water infrastructure improvement, as well as healthcare, psychosocial support, and job development.

In the town of Orocovis, sectors like Miraflores require help with similar situations. In the case of Miraflores, more than 30% of the houses suffered damage and did not receive sufficient support from FEMA or other delegated entities.

In Orocovis, a community (Montebello, La Familia, La Loma y Sanamuertos) reported to us through its community census that a third of its population lack supporting documentation for their titles. Only around 50 houses received help while many dealt with losses due to the collapse of wooden structures or landslides that left septic tanks out in the open. A similar situation can be observed in the Limones sector of the Barros neighborhood.

In all of the communities consulted by Matria, including the town of Caguas, Orocovis, Comerío, Patillas, Mayagüez, and surrounding towns, the story is repeated of poor management of the inspections on part of the companies subcontracted by FEMA, the lack of internet access or offices to promptly file claims, and the constant denial of benefits proportional to the damage received to their properties and communities.

This information can be elaborated even more. Matria began that process through Public Community Hearings held by us in the places and towns where there are people that cannot get to other areas or send information via the internet. We are, consequently, pointing out again another civil rights violation of the communities whose information and needs were excluded from the data considered to create the Plan of Action and establishing that the data utilized in it is questionable and should not constitute the only basis for which it is prepared

Necessary action:

Identification of unsatisfied needs through census data gathered by community leaders (ALHM)”

PRDOH Response: Thank you for your comment. PRDOH shares your view that FEMA datasets likely do not capture the complete impact of the hurricane and resulting unmet need, and because of that PRDOH has utilized methodologies outlined in the Unmet Needs assessment to account for the potential gaps. PRDOH also values the strong working relationship it shares with the municipios and coordinating information and resources for residents will be an important part of the recovery. The Whole Community Resilience Planning program will provide an opportunity for gathering feedback from communities across the Island to inform the recovery process at all levels. This program is intended to provide a deeper understanding of community risks and vulnerabilities for both the communities themselves and all stakeholders, to be able to utilize collaborative and informed decision making at all levels.

“3. Government Fiscal Plan

As part of Substantial Amendment Number 1, the Fiscal Plan submitted by the Government of Puerto Rico is mentioned to the Financial Oversight and Management Board of Puerto Rico Como (JCF). This mention incorporates by reference the proposed reforms by the Government and they are limited by the decisions of the Board.

According to the aforementioned document: “The Fiscal Plan includes a series of reforms in four wide sectors para improve the direction and to stimulate growth and prosperity on the whole island. 1. Human capital: to encourage the participation of the labor force implementing incentives and formal business benefits, offering development and training to the workforce and improving the reform of public services. 2. Commerce: to increase the ease of doing business by reducing barriers to establishment and sustainment of businesses; for example, to streamline and

simplify the tax-payment process, obtaining permits and operational licenses, the importation and transport of merchandise and property registration. 3. Electrical Energy: to provide economical and reliable energy by various means, that include but are not limited to the transformation of the functions of PREPA and the establishment of an “Energy Regulatory Agency, profession and well-financed”. 4. Infrastructure: effectively utilize federal funds to prioritize the investment of transformative economic capital to implement infrastructural and maintenance policies.”

On this we comment the following:

- 1. The austerity measures of the JCF have directly impacted access to services the exercise of human rights of the most vulnerable communities of the country. This includes women, rural communities, children, elderly persons and people with functional diversity.*
- 2. These measures and directives of the JCF negatively impacted the scope of the Government Fiscal Plan and have been the basis to justify legislation that has eliminated rights acquired by the working class, children in public schools, and multiple aspects of our lives including health care, work, and housing.*
- 3. The four strategies of the Fiscal Plan are the same four strategies that different Puerto Rican administration have expressed as pillars of economic development in past decades and have turned to out to be ineffective at the time to create a resilient country when natural disasters occur.*
- 4. These strategies- utilized regardless of social equity and respect for human rights- have been the driving force in the increase in inequality in Puerto Rico, from the failure of the economic development, to the increase in public debt and the misuse of federal funds such the ARRA from 2008 to 2012.*

Necessary actions:

That the Plan of Action expresses in clear fashion what the impact of the JCF when it comes to the decision-making process and that includes measures guarantee transparency, citizen participation, and attention given to vulnerable communities.

That there is clarification of the scope of the Government Fiscal Plan proposals the context of the receipt of these funds that are not recurring nor part of the regular budget of the Puerto Rican government.”

PRDOH Response: Thank you for your comments. There a number of policy-related and other issues outlined here which while important are outside of the legislative authority of PRDOH. The input is valuable and recognized as important for consideration as we undertake implementation, so this will help PRDOH moving forward. Puerto Rico is required by 83 FR 5844 to review the substantial amendment for consistency with the Commonwealth’s fiscal plan.

“4. Vulnerable populations

Our organization has documented the following data:

- 1) *There are persons that NEVER submitted their claims to FEMA for lack of access to digital mediums or services in their areas.*
- 2) *There is a high number of persons in rural areas that do NOT know how to read or write and that thus were never attended to nor solicited FEMA benefits.*
- 3) *In the case of female heads of household, the workload post-Hurricane Maria to guarantee food and shelter for their families impeded them from properly submitting their claims.*
- 4) *Elderly persons that live on their own have survived on the charity of their communities, this left them out of groups that could effectively help post-hurricane.*

In addition:

- 1) *The rise in poverty levels on the island is drastic and in Puerto Rico poverty includes the lack of transportation, lack of access to information, and lack of mediums to participate in public hearings outside of their areas.*
- 2) *As occurred with the first Plan, the LGBTTIQ were never mentioned in it and never acknowledges that it has made a reasonable effort by accessing data that allows identification of unmet needs after Hurricane Maria. Their socioeconomic condition in general since before Hurricane Maria, that has been described in special reports like those submitted in 2015, 2016, and 2017 to the Inter-American Commission on Human Rights, includes lack of access to healthcare services, housing, and economic development.*
- 3) *There are around one million women outside of the labor market due to economic, cultural, social barriers that merit an investment from the State to counteract this.*

All this is an example of how the drafting process of the Plan of Action continues failing to guarantee effective citizen participation and how that is reflected by not including information and concrete actions that attend to the unmet needs of vulnerable and affected populations by the pass of Hurricanes Irma and Maria.

We disagree with the terms included in the Plan with respect to Reimagine Puerto Rico and the Housing Damage Assessment report and Recovery Strategies of HUD as effective mechanisms to incorporate. Reimagina is the result of the work of the Advisory Board for Resilient Puerto Rico and its documents and reports do not include information that allows us to conclude, in effect, that in its analyses incorporated perspectives of gender and social class that directly address related questions with internationally recognized metrics such as the Human Development Index (HDI). In the case of HUD reports, it is worth pointing out their limited scope since that, like Reimagine Puerto Rico, they lack the depth that can only be achieved from a multisectoral analysis and focused on analysis of human rights. We close our comments in this respect by pointing out that regardless of how right or wrong the focus of the work of both groups is, the Plan of Action only should have included them after an open bidding process in which other entities would have had the possibility of being evaluated as government partners.

Once again, we point out the potential violation of civil and human rights for not considering data about their needs nor proposing how they will address their unsatisfied in a concrete and precise manner.

Necessary actions:

Guarantee the representation of women, grassroots organization, and rural communities or in risk of displacement in an Independent Community Council, that monitors and impacts the implementation of the Plan, guaranteeing sustained and long-term participation.

Establish in clear and explicit manner the processes that they will follow to guarantee said participation in the Council.

Update demographic and economic data on women, LGBTTIQ communities, and other vulnerable communities utilizing additional sources of information and incorporating studies conducted by universities and research institutions that have researched the issue.

Incorporate in mechanisms for outcome measurements and data collections that permit a continued analysis of the Human Development Index (HDI) in our country.

Include activities directed towards the creation of childcare facilities, senior centers, the creation and operations of public transportation networks throughout the entire island and of healthcare services, and financial management and assistance within a reasonable distance of remote communities far from the main urban centers of Puerto Rico.

Incorporate concrete recommendations directed towards attending to the inequality of the country beyond the generic recommendations listed in documents from Reimagine Puerto Rico and HUD.

Necessary actions for our previous comments and that we reiterate:

Continue the identification of unsatisfied needs through the census data collected by community leaders (ALHM2)

Update the rates of poverty, inequality, and other indicators of social mobility using information gathered after the hurricanes.

Include other strategies, beyond low income housing, to address the needs of impoverished communities and other groups with specific needs, such as disabled persons, the elderly, and others.

The strategies regarding economic and infrastructural revitalization should address the needs and development of these groups.

Define in detail what the vulnerable populations for the purposes of this plan, beyond the enumeration and statement of "persons with low or moderate incomes".

Require that sub-recipients and contracted companies hire people that live in Puerto Rico for housing and infrastructure economic developments, with an emphasis on vulnerable communities and groups."

PRDOH Response: PRDOH thanks you for the information on the issues impacted residents faced in relation to seeking FEMA assistance. PRDOH looks forward to incorporating updated data on poverty and other demographic data as it collected in a standardized, island-wide fashion post-Maria. The Unmet Needs assessment may be updated throughout the life of the grant as significant updates to data is released or additional funding is

appropriated. PRDOH is committed to serving impacted residents of Puerto Rico, including the elderly and women. Program implementation will be conducted in a manner which will not cause discrimination on the basis of race, color, religion, sex, disability, familial status, or national origin. Thank you for the recommendation to include the Human Development Index (HDI) as a measurement tool; we will explore opportunities to incorporate this measurement.

“5. Economic revitalization

In the case of Maria, we would like to mention the topic of economic revitalization by considering it a core aim when discussing disaster recovery in the context of goals related to the right of housing. It is no secret that in the last few years the loss of jobs in Puerto Rico has a direct relation to the increase in evictions and the construction of informal housing. This has led us to agree with studies and development models that link community economic development with improving the living conditions of the communities in general.

However, the economic development strategies of Puerto Rico in recent years have failed because they have concentrated investment of public funds in areas that lack the potential to create employment at all skill level, they depend on foreign capital that is highly volatile and has little commitment to the future of the country, as they create part-time and temporary jobs and they concentrate in economic sectors with reduced impact.

We can provide as examples of this the large investment of government capital through incentives and tax breaks to retail megastores that create part-time jobs and the investment in technology and pharmaceutical companies that require a high investment and generate few jobs, the large part of which are of high skill level.

The Plan of Action does not reflect a critical analysis of these previously-used unsuccessful strategies in the country and proposes the following points in a vague and imprecise manner:

Small business loans

- It does not clearly define to which populations they will direct them nor the socioeconomic and business profiles that would be prioritized. The description of the population does not differ from public policies from before Hurricane Maria and it is not supported by current data about businesses closed by the effects of the hurricane or income/ employment loss by geographic area.*
- It does not establish which mechanisms they will utilize to reach all areas of Puerto Rico nor which entities will be partnered with in the process.*
- It does not specify what process, if any, they will be followed to identify grassroots organization that assist in the processing of the loans nor what criteria they will meet.*

Small business incubators

- Once again it does not clearly define to which incubators they will direct available funds nor the socioeconomic and business profiles that would be prioritized. The description of the population does not differ from public policies from before Hurricane Maria and it is*

not supported by current data about businesses closed by the effects of the hurricane or income/ employment loss by geographic area.

- *The definition of incubators is ambiguous, although not to say incorrect, and it lacks additional information that allows the establishment of public policies or guidelines about the way in which they will be used in the creation of businesses.*
- *It does not establish how they will distribute the funds to interested incubators.*
- *Nor does it establish if they will require previous operation time of the incubators that receive the funds.*
- *Business incubation of agricultural businesses, manufacturing, food service, and other areas to the creation of rural areas of the country. It seems that when speaking of incubation they refer to the service industry or the creation of “co-working spaces”, something that usually does not generate jobs in volume.*

Job training program

- *Once again it does not clearly define to which entities they will direct available funds nor the socioeconomic and business profiles that would be prioritized. The description of the population does not differ from public policies from before Hurricane Maria and it is not supported by current data about businesses closed by the effects of the hurricane or income/ employment loss by geographic area.*
- *It does not establish how they will distribute the funds to interested entities.*
- *Nor does it establish if they will require previous operation time of the entities that receive the funds.*
- *The mentioned categories for job training do not account for populations of women, persons with functional diversity, LGBT communities, nor elderly adults in spite of that statistically they are held out of the labor market.*

Tourism marketing

- *There is not a reasonable connection between the possible unsatisfied and unmet needs of communities and tourism marketing.*
- *There is no logical and reasonable connection between the issue of housing and tourism marketing.*

Commercial development

- *This part of the Plan of Action is vague, and it does not coherently establish a relationship between unsatisfied needs of communities and the investment in the repair of commercial store fronts or shopping malls.*
- *They do not describe the types of businesses that would benefit from the funds nor the selection criteria they will use.*
- *It also does not state which geographical areas would be prioritized nor how it would guarantee to adequately impact the totality of Puerto Rico and not just the urban areas.*

Other areas of economic revitalization mentioned in the Plan of Action:

1. The investment of activity related to infrastructure is problematic in the context of some funds that should prioritize issue of housing. The document does not establish how it will determine priority activities and how they will address the needs of the communities that do not wish to be displaced and those which mitigation measures for landslides, flood, loss of power, and water supply are important in the context of natural disasters.

2. FEMA- The vagueness of this section worries us in light of the following observations:

a. It mentions the funds will be used to match FEMA funds and, nevertheless, it does not specify the total amount of funds the will be allocated for this purpose.

b. It mentions that the matching funds from FEMA should meet CDBG-DR requirements, but this is troubling as it in parts is proposing to finance activities whose validity and relevance are questionable in light of the CDBG-DR regulations and the possible uncovered needs of communities. (See our comments above Tourism and Commercial Development).

Necessary actions:

Open the selection of partner entities up to a public call for tenders and revoke the pre-selection of Reimagine Puerto Rico, Foundation for Puerto Rico and any other entity which was included in the Plan without a transparent selection process through which they were evaluated by other entities. The process of a public call for tenders for partner entities must include the selection criteria and allow for the consideration of different entities from the country with the ability to administrate and distribute the funds separated into areas of focus such as planning, community resilience and tourism, etc.

Within the areas wherein the Department of Housing or other government agencies is to distribute funds, whether directly to beneficiaries or to receiving bodies (such as the incubators), establish the criteria for selection, the process for the allocation of funds, the profile of the people charged with the allocation and the scheduled dates for receiving and assessing proposals.

Establish methods for transferring and distributing funds which eliminate barriers to participation for community organizations. For example, eliminate requirements for matching funds, pay out funding requests in advance rather than via reimbursement and create standardized accounting systems.

For job creation, identify geographical areas of higher priority.

For job creation, require the creation of full-time, long-term jobs with benefits which support positive economic development for those who need them.

In all areas of economic revitalization, incorporate a requirement for affirmative action plans to guarantee recruitment and hiring of women and other vulnerable populations.”

PRDOH Response: PRDOH understands that recovery is a multi-faceted effort and values collaboration with the non-profit sector. Non-profit organizations are eligible applicants for several programs outlined in the Action Plan. Additionally, PRDOH seeks to maximize local employment, contractor and business participation and job creation in the CDBG-DR programs to every extent feasible while also complying with HUD Section 3, Davis Bacon

wage requirements and procurement requirements as outlined in 2 CFR 200. Additionally, the programs outlined in the economic recovery section offer a comprehensive set of entry points for local businesses and workers, ranging from accelerators and incubators to small business financing and revolving loans. The PRDOH Section 3 plan will incorporate goals for all contracted firms for local hiring of business and individuals. Job creation will be tracked and reported for all applicable programs.

The economic recovery portfolio will be led by the Puerto Rico Department of Economic Development and Commerce (DDEC), whose expertise in locally-relevant strategies is instrumental in addressing the recommendations put forth. Small business and loan programs will be proactively marketed throughout the entire island. PRDOH appreciates your input and will take these suggestions into consideration during further development of programs. Guidelines will be published to www.cdbg-dr.pr.gov.

“6. Public policies which must be explicitly included in the Puerto Rico Action Plan (Actions required with regards to public policies):

- 1. Public policy establishing as a priority the evaluation, planning and development of relief efforts which avoid displacement of communities.*
- 2. Public policy for the development of economic activities at the local level and for the development of a Puerto Rican business sector which can engage with the economic development of communities across the country and for the long term.*
- 3. Public policy requiring that any public or private body which obtains CDBG-DR funds have an affirmative action plan which allows for the appropriate hiring of and support for people from vulnerable communities and populations including women, LGBT people, people with ability differences, older people and residents of rural areas with little access to services elsewhere.*
- 4. Public policy promoting transparency and fostering public participation in the distribution and guidelines for use of the funds.”*

PRDOH Response: Thank you for your public policy recommendations. PRDOH is committed to leading a responsible, compliant and transparent recovery effort. As required by 83 FR 5844, PRDOH must post information related to its CDBG-DR Grant to its website for public consumption. Information including procurement policies, contracts, Quarterly Performance Reports (QPR), expenditures, program policies and procedures, and other related information will be posted to PRDOH’s disaster recovery website at www.cdbg-dr.pr.gov as it becomes available.

“7. Prevention of fraud and oversight of the use of the funds.

The plan is vague when it comes to establishing how, by who and for which activities in particular the funds will be used. This vagueness is the perfect recipe for fraud or the waste of funds on activities which do not meet the unaddressed needs of the people affected by the hurricanes.

Necessary Actions:

Include in the Action Plan the minimum requirements for the distribution of funds via the delegate agencies, including: (1) Broadly advertised public calls for tender; (2) A list of the competency requirements; (3) Clearly-defined goals for the investment of the funds; (4) Calls for itemized proposals; (5) An execution period for the projects; (6) Quantifiable goals; (7) Metrics and evaluation criteria to be used for the selection of groups, businesses, organizations or entities which are to receive funds or which will be contracted for projects.

Maintain a public, accessible and up-to-date list of all contracts or grants which will receive these funds, including the number of the contracted or receiving entity, the amount of funding received and a copy of the contract.

Include in the Plan of Action the State's obligation to maintain public and accessible information on the progress of the projects financed by the funds. (Accounting)"

PRDOH Response: As described above, PRDOH is committed to leading a responsible and transparent recovery effort. As required by 83 FR 5844, PRDOH must post information related to its CDBG-DR Grant to its website for public consumption. Information including procurement policies, contracts, Quarterly Performance Reports (QPR), expenditures, program policies and procedures, and other related information will be posted to PRDOH's disaster recovery website at www.cdbg-dr.pr.gov as it becomes available.

As mandated by HUD, PRDOH must follow HUD-approved procurement processes which encourage fair and open competition and comply with 2 CFR 200. Information regarding contracts procured by PRDOH related to its CDBG-DR grant, including contract value, start and end dates, summary of scope, and complete copies of executed contracts, is available publicly at <http://www.cdbg-dr.pr.gov/contratos/>.

"8. Rights of people affected by disasters

We must reiterate and emphasize the necessity of guaranteeing four basic rights for the people affected by hurricanes Irma and Maria in Puerto Rico. We once again cite the text from a section of the comments submitted by the ALHM which concerns us:

"Recommendations regarding the rights of the people affected by hurricanes Irma and Maria which must be included in the final Plan.

Necessary Action: Include the rights outlined below in the Plan of Action and use them as guiding principles for the plans which the government of Puerto Rico proposes regarding the CDGB-DR funds

1. Right to decide

a. The right of people affected by hurricanes Irma and Maria to decide where they live must be respected. This includes the responsibility of the government and its contractors to attempt to obtain increased community participation and prior informed consent before proposals for rehousing, relocation and resettlement.

2. Right to remain

a. *The right of these people to remain in or return to their communities, provided that these same are safe and habitable, must be respected. We define safe and habitable as those homes and communities which have been given a real, interactive and reasonable opportunity to mitigate the damage suffered due to the disaster. Mitigation must always be considered as the first choice, before relocation.*

b. *In those cases where rehousing is necessary, the government and its contractors (subrecipients) must give priority to maintaining the integrity of the community, respecting geographic proximity and any special needs which may exist.*

3. Right to equal treatment and absence of discrimination

a. *The government of Puerto Rico must guarantee fair, equal and non-discriminatory treatment of affected people by providing sufficient assistance throughout the recovery process. This includes the long-term recovery of its communities.*

b. *As part of a dignified and fair recovery, every community and individual must be treated equally regardless of their race, sex, sexual orientation, gender identity, age, ability, income, national origin or other category. Equal treatment must be guaranteed in the completion of projects intended to provide flood protection and, likewise, there must be equal treatment when it comes to the implementation of housing, infrastructure or economic revitalization projects.*

c. *The government of Puerto Rico must take an active role in the protection and defense of the rights of historically vulnerable groups such as elderly people, women, impoverished communities, people with ability differences, people from the LGBTTIQ communities, homeless people, and immigrants, among others.*

4. Right to real and effective participation

a. *This right is related to the opportunity for people, groups and communities to participate in a direct, real and effective manner. This includes the real ability to obtain information about, comment on, and attend public hearings, to be truly listened to and heard at said hearings, and to be part of processes related to the CDBG-DR funds and other post-disaster recovery processes.*

b. *The highest standard of accessibility must be considered so that populations with differing abilities are able to participate, as provided for by local and federal regulations.*

c. *Regarding real and effective participation, it must be recognized that there exist people who more than a year after the hurricane still lack the electrical, transportation and communication resources necessary to learn about and participate in the plan.”*

These comments are only the tip of an iceberg which we do not have the capacity to fully describe.”

PRDOH Response: Thank you for your public policy recommendations. PRDOH is committed to reducing poverty and social inequality.

Comment: #366_10-19-18_Alicia Díaz Santiago (Relimagina Puerto Rico)

“The Resilient Puerto Rico Advisory Commission (the Commission) was established in November of 2017 as an independent and inclusive body for Puerto Ricans. With the support of The Rockefeller Foundation, Open Society Foundations, and The Ford Foundation. The ReImagina Puerto Rico project of the commission has drafted a series of actionable recommendations that will serve as a guide for the recovery and reconstruction efforts in Puerto Rico; physically, economically, and socially. These recommendations were developed with the purpose of helping Congress, federal agencies, the Puerto Rican Government, and its municipalities with efforts to spur the long-term recovery of the island. The recommendations address issues in these six sectors: Economic Development, Housing, Physical Infrastructure, Energy, Natural Infrastructure, Healthcare, Education, and Social Services.

It is important to establish that the Commission is independent, non-partisan, non-governmental, and does not receive public funds. It is financed by charitable organizations as part of an effort towards the resilient recovery of Puerto Rico. The Commission acts as a diverse but unified voice with broad participation of experience and knowledge where we evaluate and recommend priority areas that drive the recovery and transformation of Puerto Rico. The Commission has worked as a consensus builder and active participant along with local and American organizations during our process.

As part of the citizen participation process in the project, ReImagina Puerto Rico called upon members, community leaders, non-profit organizations, business leaders, government officials, and representatives from professional organizations, among other groups. In addition, it provides a platform for discussing concerns and aspirations with respect to a stronger Puerto Rico. As a result of this exercise, ReImagina Puerto Rico proposed six cross-cutting strategies to achieve the recovery objectives and a series of 97 projects that encompass all sectors of work. The recommendations include: 18 projects for the Housing sector; 12 for the Energy sector; 30 for Physical Infrastructure; 9 for Healthcare, Education, and Social Services; and 16 for the Natural Infrastructure sector. The report highlights 17 of these recommendations considering them priorities, actionable, and that address critical elements for the recovery and reconstruction of Puerto Rico.

After an analysis of the draft amendment of the CDBG-DR Disaster Recovery Action Plan, ReImagina Puerto Rico suggests considering the following remarks. Said remarks not only represent the work of ReImagina during our consultations with experts from academia, private sector professionals, community leaders and organizations; but also, they represent the feedback that ReImagina has been gathering throughout this week from other partner organizations.

General comments for the CDBG-DR Disaster Recovery Action Plan

We ask that you consider and incorporate the following comments and recommendations developed by ReImagina Puerto Rico.

1. One general comment, that is repeated throughout the actions of the plan, is that the actions lack eligibility requirements. Even though we understand through communications that the Housing Department has made that they are drafting regulations and eligibility criteria, we think that it was necessary to publish said criteria with the plan to allow and exhaustive analysis of such and be able to understand feasibility of each action. Moreover, we would like to be able to know

that the eligibility criteria they will be using for the selection of non-profit organizations for them to be considered as subrecipients of housing programs that are designed accordingly.”

PRDOH Response: All of the items above will be included in program guidelines. PRDOH will publish program guidelines for each program on the website as they become available. Non-profits are currently providing important services in the recovery, and will continue to play an important role in the long-term recovery of Puerto Rico. Program descriptions in the Action Plan indicate programs wherein non-profits can get involved or be eligible applicants, and the program guidelines will provide further information.

2. The Action Plan also does not have any oversight mechanisms. We understand that in order to not only allow oversight of the program, but also to measure the success of its implementation, these mechanisms should exist beforehand.

PRDOH Response: As part of the submissions to HUD associated with the original Action Plan, PRDOH submitted certifications of proficient financial controls, which were approved by HUD. Further, this includes a monitoring and compliance plan which covers all programs. Lastly, HUD requires quarterly and annual reporting in their Disaster Recovery Grants Reporting portal (DRGR). PRDOH is committed to leading a responsible and transparent recovery effort. As required by 83 FR 5844, PRDOH must post information related to its CDBG-DR Grant to its website for public consumption. Information including procurement policies, contracts, Quarterly Performance Reports (QPR), expenditures, program policies and procedures, and other related information will be posted to PRDOH’s disaster recovery website at www.cdbg-dr.pr.gov as it becomes available.

3. On page X it mentions our ReImagina Puerto Rico report. We appreciate the mention and the inclusion of ReImagina Puerto Rico’s effort. We want to clarify that our report is not a plan, our report presents recommendations and priorities for the reconstruction process. Our objective is to produce a series of actionable and specific recommendations about how to utilize philanthropic and government financial sources – local and federal – to contribute the reconstruction of Puerto in a manner that strengthens the island – physically, economically, and socially – and to be able to prepare it confront future challenges. As previously mentioned in this writing, the work is divided into 6 sectors, and not 5 as the Action Plan says. We believe that that the mentioned paragraph should read: “The Resilient Puerto Rico Advisory Commission has drafted a series of actionable and specific recommendations about how to utilize philanthropic and government financial sources – local and federal – to contribute the reconstruction of Puerto in a manner that strengthens the island – physically, economically, and socially – and to be able to prepare it confront future challenges. This plan contains recommendations for 6 sectors:

- *Housing: Develop a series of strategies that reduces risk factors and that fosters community empowerment by confronting the diversity of socioeconomic conditions, and housing types and ownership in Puerto Rico.*
- *Energy: Address the energy needs of Puerto Rico through the transformation of its electric power infrastructure to an affordable, reliable, and innovative system, that at the same time reduces adverse effects on persons and the environment.*

- *Natural Infrastructure: Improve the health and well-being of the people, foster economic development, and reduce exposure to dangers through the sustainable use of the natural resources of Puerto Rico.*
- *Economic Development: Develop a wide variety of economic activities that enhance the resilience of Puerto Rico and improve existing capacity, employment opportunities, and reduce inequality.*
- *Physical Infrastructure: Develop and maintain infrastructure systems that are accessible, integrated, flexible, and sufficiently robust so that they can support the well-being of Puerto Ricans.*
- *Healthcare, Education, and Social Services: Develop initiatives that guarantee the delivery of healthcare, educational, and social services to reduce existing and future vulnerabilities, and at the same time, chart the path toward equality and well-being with greater participation of person in defining and implementing it.”*

PRDOH Response: Thank you for the clarification, PRDOH will make adjustments for the final submission.

“4. It is recommended that Housing implements processes and minimum procurement requirements to maximize the hiring of local businesses and local jobs.”

PRDOH Response: Thank you for your comment. PRDOH seeks to maximize local contractor and business participation and job creation in the CDBG-DR programs to every extent feasible while also complying with HUD Section 3 requirements and procurement requirements as outlined in 2 CFR 200. Additionally, the programs outlined in the economic recovery section offer a comprehensive set of entry points for local businesses and workers, ranging from accelerators and incubators to small business financing and revolving loans. The PRDOH Section 3 plan will incorporate goals for all contracted firms for local hiring of business and individuals. Job creation will be tracked and reported for all applicable programs.

“5. We recommend that you show how the public can access unmet needs identified by the municipality.”

PRDOH Response: Thank you for your comment. PRDOH values the strong working relationship it shares with the municipios and coordinating information and resources for residents will be an important part of the recovery. Also, the Whole Community Resilience Planning program will provide an opportunity for gathering feedback from communities across the Island to inform the recovery process at all levels.

“6. We recommend that you develop a general application for direct assistance programs for individuals and families so that they can apply to multiple programs simultaneously. This application will allow Housing to determine eligibility depending on the case. We suggest that you provide a general explanation of how the application per program will be for individuals.”

PRDOH Response: Thank you for this input. PRDOH aims to introduce efficiencies across all programs and provide applicants with relevant programmatic information upon intake.

“RECOMMENDATIONS FOR PLANNING PROGRAMS

Whole Community Resilience Planning

7. This program should not limit itself to planning. It should consider establishing grassroots programs and procedures to respond to emergencies, identify shelters, and to train community volunteers. This action proposed the development of emergency response procedures directed by the community, the identification of emergency shelters (including under-utilized public buildings in cities and urban centers), and the creation of training programs for community leaders and volunteers.”

PRDOH Response: This is a good suggestion but is more suited for a different planning program funded under FEMA. This program is distinct from emergency response and preparedness planning, and so this comment is more suited for Hazard mitigation planning being undertaken by the Planning Board under FEMA 404.

“8. Areas with a severely affected high LMI population density should be considered a priority, since vulnerability is relative to the impacts of natural events and are not directly related to floods, such as hurricane winds.”

PRDOH Response: PRDOH prioritizes LMI populations across all programs, as outlined in the Action Plan. The Federal Register Notice carries a 70% LMI benefit threshold for the entire grant, mandated by HUD. An estimated percentage of funding spent for each program which will benefit low- and moderate-income persons is included in the overall budget table included in the Action Plan. As indicated in the Action Plan program description, this program prioritizes “High-risk communities, which are defined as communities situated in the floodway or floodplain, landslide risk areas: and/or areas of concentrated damage.”

“9. For it to be effective, this program should be proactive where it encourages the participation of all the communities in the first phase. The collected information should align itself with all the other presented programs in the Action Plan and there should be constant oversight.”

PRDOH Response: Thank you, this is part of the program design as indicated in the Action Plan, and further information will be provided in the program guidelines. All programs will be subject to regular monitoring and compliance reviews.

“10. This program should be designed with the objective of encouraging collective collaboration of the communities on reconstruction efforts. This program should seek and make sure that there is effective contribution from communities regardless of skill level and their organization.”

PRDOH Response: Thank you, this is also part of the program design. This is a participatory planning initiative, and PRDOH recognizes that all communities have varying levels of capacity and organization, and as such there will be resources to draw upon for communities in need.

“11. Housing and the municipalities should utilize the information from this process to update the Action Plan, redefine priorities, and check unsatisfied needs.”

PRDOH Response: Thank you, this is also part of the program design. This program is intended to provide a deeper understanding of community risks and vulnerabilities for both the communities themselves and all stakeholders, to be able to utilize collaborative and informed decision making at all levels.

“12. This program should redefine the cost-benefit framework utilized to define the viability of the community in which they include multisectoral objectives such as risk, and social and environmental well-being.”

PRDOH Response: PRDOH agrees, it is important to have a holistic body of knowledge to inform community risk and vulnerability. The program guidelines will provide additional information about data and sectors that will be evaluated.

“Agency Planning Initiatives

13. This initiative should be expanded with the purpose of updating the digital land register of the island, and include the use and occupation of structures, information about land ownership, details on informal housing, and information on insurance coverage. The first step to developing a more secure housing sector in Puerto Rico would be the creation of a centralized and accessible database that includes land ownership and usage for the informal housing sector, as well as economic opportunities. The recommendation may lead to fragmented platforms if a centralized database from the beginning. The data they would gather, digitalize, integrate, share, and update periodically in a coordinated, transparent, and accessible manner to create a secure and accurate database of reliable information that supports the planning and decision-making of reconstruction and future development.”

PRDOH Response: Thank you for this comment, PRDOH recognizes the importance of this issue as instrumental in the recovery process and for the long-term growth of Puerto Rico. As described in Action Plan, the goal of this program is to bring fragmented datasets together, so your input is in line with the goals of the program.

“14. In combination with data integration, it is a priority to improve the capacity of local, municipal, and non-governmental agencies to regulate land use and construction through the adoption of improved rules and practices. Although other measures support the development of related technical resources related to awareness about the risks and better land use and construction practices, these will not be effective unless they are combined with improvements in the ability of local agencies to supervise and regulate land use, construction, and the effectiveness of proposed plans. They should develop ability and train local construction professionals to assist government construction regulators. They should explore opportunities to integrate mobile technologies to simplify and streamline compliance. Beyond increasing regulatory capacity of construction and land use in Puerto Rico, this action should examine the policies and practices que discourage compliance with regulations. This includes: (a) the responsibility given to licensed architects and engineers in Puerto for design flaws, while they do not demand a license of

contractors; y (b) the perceived lack of transparency and impartiality in land use and land allocation on the part of the government.”

PRDOH Response: There a number of policy-related and other issues outlined here which while important are outside of the aims of this program. The Planning Board does have some other initiatives underway which may be more suited for further inquiry. The input is valuable and recognized as important for consideration as we undertake implementation, so this will help PRDOH moving forward. Thank you.

“15. Create a path towards compliance with construction codes in the informal housing sector through the development of ‘Applications Documentation’ of the Puerto Rican Construction Code that supports a simplified, swift, and economic process of design and issuance of permits for new and reconditioned houses, based on appropriate housing types for the area. This action requires a focus that not only encourages the home owners, building owners, and renters to comply with regulations, but also recognizes that it can be necessary to make changes in the way that codes are developed and to enable compliance. One of the advantages of creating a path towards code compliance in the informal housing sector is that it allows home owners, building owners, and renters to have access resources, tools, insurance, and funds for disaster recovery that previously were out of reach. The Puerto Rican Construction Code should be updated to produce simplified guidelines and pre-approved plans that allow the informal housing sector to acquire economic housing that complies with constructions codes, as well as guidelines for refurbishment of certain types of structures. Also, the regulations for the issuance of permits with the purpose of streamlining and expediting future refurbishment work and the development of safe housing henceforth. Create a pro-bono recruitment program for engineers and architects which utilizes volunteer labor for the accreditation of continuing education, provides services to communities in need, as well as to educate and legalize the procedures.”

PRDOH Response: Relmagina provides good insight into a number of challenging areas around informal housing and code compliance, and design resources and volunteering support from architects and engineers. However, the Agency Planning Initiatives program is not relevant to addressing all of these issues. PRDOH values this input and will keep this in mind for the future.

“16. Training, institutional, and economic activities should be introduced to assure that the integration and proposals are continuous and are not affected by administrations changes nor that it limited to a sole occasion.”

PRDOH Response: This is good input, thank you. PRDOH agrees that the result of this program must be a usable long-term solution for Puerto Rico.

“Economic Recovery Planning Program

17. Within economic recovery planning, it must be ensured that in hiring related to reconstruction efforts; priority is given to employment, training and certification of the local workforce. We must maximize the economic benefits and the development of the workforce that arises from the recruitment of the public sector for reconstruction and other public capital investment projects. We are convinced of the importance of establishing minimum standards for the hiring of

employees residing in Puerto Rico. Labor force and occupational training of Puerto Ricans can be linked to projects related to reconstruction through training programs supported by the Workforce Innovation and Opportunities Act (WIOA). Additionally, training programs can be improved so that participants acquire the skills and experience necessary to obtain the relevant commercial and professional certifications. Likewise, the participation of small companies in contracts can be promoted, through subcontracting or the fragmentation of projects in different units. Probably the most important task in establishing a building code compliance program is the proper training of our workforce. A partnership between all sectors is needed to adequately receive the additional workers that will be needed to carry out the reconstruction and mitigation programs.”

PRDOH Response: Thank you for your comment, PRDOH is aligned in this matter and seeks to maximize local contractor and business participation and job creation in the CDBG-DR programs to every extent feasible while also complying with HUD Section 3 requirements and procurement requirements as outlined in 2 CFR 200. Additionally, the programs outlined in the economic recovery section offer a comprehensive set of entry points for local businesses and workers, ranging from workforce development programs, to accelerators and incubators to small business financing and revolving loans for construction companies. The PRDOH Section 3 plan will incorporate goals for all contracted firms for local hiring of business and individuals. Job creation will be tracked and reported for all applicable programs.

“Home Resilience Innovation Competition Program

18. This program should be a seed for a long-term program or institute, and where research on housing-related challenges is promoted.”

PRDOH Response: Thank you for this comment, PRDOH will consider as we further develop program design.

“19. The competition must integrate the challenge of balancing among building code requirements, affordability and resistance to floods, hurricanes and earthquakes.”

PRDOH Response: PRDOH agrees and this is part of the program design, and further information will be available in the program guidelines when they are published.

“COMMENTS FOR HOUSING PROGRAMS

Repair, Reconstruction or Relocation Program

20. We are concerned that there are neither policies for mitigation as a first option, nor the option to educate communities about the risks and opportunities they face to make decisions regarding the opportunities offered by the program. We recommend encouraging or incentivizing, under the direction of the community, the voluntary relocation of families living in high-risk areas that are susceptible to environmental upheavals, through the acquisition of land and rezoning for land conservation. It is likely that, in some cases, the resettlement or relocation of homes is the only viable option to avoid further damage and loss of life during future natural disasters. To the extent possible, the first point of intervention should be to identify if it is possible to implement structural

mitigation measures in the communities or in the homes, so that the residents remain safe in their communities without being at risk of suffering the devastation again. That said, voluntary relocation processes must be implemented as a strategy of last resort. This measure should include a comprehensive education process that explains high-risk exposure situations and a transparent participatory process in which the feasibility of other measures is discussed. The implementation of a relocation program must support the following principles:

- a. Relocation must consider social cohesion and the implications that it has in the social network.*
- b. The affected communities must participate in the planning and implementation of a long-term relocation program.*
- c. Decisions should be based on knowledge of community assets, social ties and economic opportunities.*
- d. The proposed relocations must integrate a regional knowledge of development with the existing efforts of urban planning and infrastructure development.*
- e. Housing options should be attractive for people who have to move and there should be incentives to promote voluntary relocation, including better access to opportunities. This may require reconsideration of zoning and residential density regulations.”*

PRDOH Response: Thank you for your comprehensive input on these topics, which are indeed complex matters. This program is not a mitigation program in and of itself, but a repair, reconstruction, and relocation program, and some construction activities will incorporate mitigation measures in line with building standards. The program guidelines will outline these options, and evaluations of damage and condition of structures will inform applicants of options. All applicants choosing to relocate will do so voluntarily. PRDOH understands that relocation is a challenging decision for individuals and communities.

“21. The relocation option should consider LMI homeowners who wish to live in a structure with little likelihood of damage from other disasters (earthquake and cyclones) as long as the \$150,000 voucher is honored.”

PRDOH Response: Thank you for this input. All relocation is voluntary, and all homeowners choosing to relocate will participate in housing counseling, which will help them understand options.

“22. The proposed plan of action and amendment does not allow CDBG-DR funds to be used to rebuild or repair homes in areas with known flood risks and damages caused by earthquakes. It is important that communities are involved in the process and are empowered to make decisions as required by federal laws and regulations. It is necessary to develop a process to address the relocation of families and/or communities.”

PRDOH Response: Thank you for recognizing this issue. PRDOH is also aware of the challenges that communities and individuals are facing. As indicated in the previous responses, all relocation decisions are made voluntarily, and homeowners electing to relocate will participate in housing counseling. On a larger scale, communities facing larger

scale risks will be able to engage in greater dialogue within the Whole Community Resilience Planning program.

“23. The eligibility requirements or qualification of properties that may be used for the purchase must be provided with the \$150,000 voucher.”

PRDOH Response: Further information will be available in the program guidelines, which will be published on the website.

“Title Clearance Program

24. The Title Clearance Program does not define what course of action should be taken to help homeowners take their residence to establish ownership. Some main aspects of this type of effort are:

- *Research and recommendations on the path that must be followed to ensure that informal communities throughout Puerto Rico achieve land ownership.*
- *Decision making based on risks, protecting land titles of people and communities, to ensure the mitigation of future damages.*
- *Making informed decisions about the risks involved in obtaining property titles for individuals and communities, to ensure the mitigation of damages in the future.*
- *Changes to existing policies on household access to post-disaster funds.*
- *Policies to protect communities from displacement and promote access to affordable housing.*
- *Policies to reduce the number of absent owners and deteriorated buildings.*
- *Education and legal assistance to inform residents about their rights and options.”*

PRDOH Response: Thank you for this input. There are multi-faceted issues in the policy recommendations above and are indeed important for Puerto Rico. These considerations are appreciated as we consider program design, although not all items mentioned above are well suited specifically for this program. PRDOH understand the importance of this program, which is why it is included in the first set of programs. One of the goals through this program is to help applicants be able to access other resources. The program guidelines will provide further detail on this program, and these will be published on the website.

“Rental Assistance Program

25. It is recommended to expand the proposed program to support the Department of Housing in establishing an island-wide emergency management protocol that includes a voucher program for temporary housing, temporary rental control, mortgage foreclosure moratorium, and predatory loan prevention and monitoring. Although the Plan of Action has a "Rental Subsidy" plan, it is important to implement strict command and control policies during emergencies in the housing sector, to avoid displacement, promote security and cover basic housing needs while families they are recovering. Avoiding drafting practices during emergencies, either by taking measures to control temporary rentals for low- or moderate-income families or by monitoring

and preventing predatory loans, may also reduce the possibility of migration and displacement of residents. Implementing a ban on foreclosures during emergency management and during the initial periods of recovery can be very helpful for vulnerable families.”

PRDOH Response: Thank you for your comment, PRDOH will take this into consideration.

“Mortgage Catch-Up Program

26. This program should be expanded to include municipal land banks for the acquisition of affordable housing through the creation of: (a) sale-leaseback programs (“lease buyback”) to avoid foreclosures and (b) buyout schemes (“Buyout”) to acquire foreclosed or unoccupied properties in risk-free areas. Federal recovery funds can be used to develop the capacity of municipalities to administer land banks. The practice of “landbanking” or acquisition of lots for long-term investment, has been used in disadvantaged communities in Detroit and Albany to create lease buyback programs in which local entities buy delinquent housing debt to eliminate the risk of foreclosure. Likewise, non-governmental organizations and community-based organizations can also promote philanthropic and federal funds to create their land banks. The Action Plan contains an “Updated Mortgage” program, which will use funds to provide assistance with delinquent mortgage payments of up to 12 months. The municipal land bank can be another solution that helps the delinquent owners to conserve their properties.”

PRDOH Response: Thank you for your input on this issue, this is an important consideration and PRDOH appreciates the comment.

“Housing Counseling Program

27. We acknowledge a major initiative to develop programs that increase Puerto Rican’s knowledge of issues related to housing. We recommend expanding the proposed program to include assistance with safe and healthy housing. This initiative can help to prepare and distribute a manual that provides practical guidance for “do-it-yourself” repairs to improve housing safety. The manual will allow home owners, renters, and building owners to make informed decisions when setting priorities to repair, reconstruct, and buy materials. After the development and distribution of the manual, we should offer training through local universities, partners, and organizations. We suggest that this recommendation be included in the Housing Counseling Program and it should be promoted with Home Resilience Innovation Competition Program. Another point of importance, and that can be included in this program, is to educate owners about the danger of living in property with lead paint, and other health risks.”

PRDOH Response: This is very helpful input, thank you for your comment. PRDOH will consider this as program guidelines are further refined.

“28. We recommend that it is included as a requirement the participation of Puerto Rican non-profit housing counseling agencies that are certified in the guidance that they offer. Among the major priorities, they should consider education and counseling for families on acquiring their first home. They should have them a wide range of services from budget and credit management (essential during the homebuying process) and first-time buyer workshops in which they proved them the necessary tools so that they can identify the best offering on the market that fits their needs and budgets. With this counseling and these workshops, we minimize the risk of a future

foreclosure and seizure. In addition, the families should take foreclosure prevention workshops which give them reliable and assertive information on effective budget and financial management strategies to avoid default on mortgage payments. Also, the distribution of allocated funds to non-profit organizations that are certified housing counseling agencies should be organized by region, in a fair manner and without competition. Each organization should be assigned a region of the island, preferably according to the regions they already serve, and to establish specific and realistic goals for the number of clients that they will attend to in a given time period.”

PRDOH Response: These are all very helpful comments, thank you. PRDOH will take this input into consideration. Many of the items referenced above, such as financial literacy, are incorporated into program guidelines, which will provide a greater understanding of the program, and these will be available on the program website.

“29. In addition to the counseling program, we recommend supplementing the initiative with a communication campaign to develop a culture of awareness of and preparation for emergencies in the home. A communication campaign aimed at developing awareness and preparation for a variety of issues, so people will be better prepared for emergencies. A program which includes establishing a preparation plan for emergencies and supporting families in establishing savings accounts for special occasions, which will help low and moderate-income families to better prepare themselves and to recover from the economic impacts of disasters.”

PRDOH Response: This is helpful input, thank you for your comment. PRDOH will take this into consideration.

“Community Energy and Water Resilience Installations

30. People who have critical medical needs and are dependent on the power supply must be prioritized in addition to the elderly population.

PRDOH Response: Thank you for your input, PRDOH will take this into consideration.

“31. Align the program with the Responsibility for Innovation in Home Resilience and Homebuyer Assistance Program.”

PRDOH Response: Thank you for your input, PRDOH will take this into consideration. It should be noted that all programs within the portfolio are designed to operate in an integrated fashion, as part of a complex and interconnected adaptive system. In this way, the Home Resilience Innovation Competition is designed to provide inputs across a number of programs.

“32. We recommend that this program include the offer of one-on-one housing advice services and workshops for first-time home buyers for all clients interested in purchasing a first home. This will allow the clients and the non-profit housing advice agencies to create proactive plans together, ensuring that the participant in the Homebuyer Assistance Program receives financial training and education. The result of this advising will be buyers who are educated and prepared to responsibly take on a mortgage, reducing the risk of falling into foreclosure and eviction.”

PRDOH Response: Thank you for your comment, PRDOH will take this into consideration.

“Other comments

33. Create insurance pools and promote public awareness to improve access to and use of natural disaster insurance. This program could include the creation of an insurance pool to provide better access to recovery funds for homes and communities. This type of program could be created through a partnership between banks and insurance companies, with the possibility of using CRA funds or other funding sources.”

PRDOH Response: Thank you for this input, education and access are indeed important issues to address around insurance. PRDOH will take this into consideration.

“34. Repossessed and abandoned properties. Inventories of these properties must be offered at affordable prices, by non-profit organizations dedicated to the development and refurbishing of affordable housing. The non-profits are able to undertake projects involving the refurbishment and procurement of these properties, for families who have received financial training and education by said organizations, these families having prepared to improve their credit ratings and manage their budgets making them suitable candidates to purchase a home through the country’s financial institutions. This strategy minimizes the number of repossessed homes which do so much damage to the loan portfolios of local banks and to the regional economy.”

PRDOH Response: Thank you for your comment, PRDOH will take this into consideration. It should be noted that this approach or policy recommendation is in many cases relevant to the greater private property real estate market. However, the input is appreciated and PRDOH values a strong working relationship with NGOs.

“35. Make it comply with the open space resolutions through programs/guidelines dedicating land to the creation of parks, green infrastructure projects, land conservation or other appropriate uses. These programs can be kept up through partnership agreements with NGOs, like Para la Naturaleza for example.”

PRDOH Response: This good input, thank you for your comment. PRDOH will take this into consideration.

“COMMENTS ON THE ECONOMIC DEVELOPMENT PROGRAMS

Workforce Development Program

36. We recommend expanding this program to grant priority to the funding from the Work Innovation and Opportunity Act for training, re-training, and certification of skills in priority sectors. The granting of WIOA funds must reflect the needs of the priority sectors by supporting the career paths of people who have work and life experience, but who lack formal education or certifications in these industries. They must undertake rapid evaluations of the labor needs of the priority sectors, taking into account the current reconstruction efforts, the need for competitiveness and the sector's growth over the medium and long terms. The unions must work on these evaluations with the business groups and the Puerto Rican authorities involved in the granting of WIOA funds.”

PRDOH Response: Workforce development is indeed a critical part of the recovery of Puerto Rico, under the CDBG-DR program as well as other initiatives, and for the long-term of the Island. Thank you for your input on this matter. PRDOH will take this into consideration.

“37. We recommend that there be a focus in this program on the development of job opportunities on the Island both for young Puerto Ricans and for the older members of the workforce, ensuring the quantity and quality of the future workforce in order to foster growth in priority sectors and economic groups. Contracts in priority sectors by the government and the private sector must offer explicit incentives to train young Puerto Ricans and re-train the workforce during the reconstruction.”

PRDOH Response: Thank you for this comment, PRDOH will take this input into consideration. The youth and elderly are encouraged to participate, and further program implementation will be conducted in a manner which will not cause discrimination on the basis of age, race, color, religion, sex, disability, familial status, or national origin.

“38. Developing a training and skills-development program to promote green businesses which are key to the recovery process must be considered.”

PRDOH Response: This is valuable input, thank you for your comment. PRDOH understands the importance of these types of businesses within Puerto Rico relative to the recovery and also for the long-term revitalization of the Island, and also recognizing the ability to be able to export best practices and products from Puerto Rico to the region and beyond. Within the economic recovery programs are a number of opportunities for these types of businesses, such as small business financing and incubators and accelerators.

“Others

39. We understand that job or business opportunities are not the only strategies to improve poverty in Puerto Rico. For this reason, we recommend a program which will promote social services programs to reduce family and childhood poverty, with the goal of ensuring the preparation of the future workforce. As a first step, the Government of Puerto Rico should create a commission on Childhood Poverty which will be charged with setting goals for the reduction of childhood poverty at the level of the Island and in municipalities, through results-based accounting and a collective action plan to monitor and reduce childhood poverty. The Commission on Childhood Poverty could be created through an Executive Order or through legislation. This commission will direct the efforts to compile data and develop comprehensive metrics and goals towards reducing childhood poverty. The Commission will oversee the conditions at a local level and return reports annually or more often, describing trends. It will establish a specific strategy for the reduction of childhood poverty which reflect the analysis of those trends.”

PRDOH Response: Thank you for your comments. PRDOH will take these suggestions into consideration during further development of programs outlined in the Action Plan or during development of new programs, if additional funding becomes available.

“COMMENTS ON THE INFRASTRUCTURE PROGRAMS

Others

40. Programs have not been identified to serve and support municipalities on a technical level to comply with the planning and management of rainwater and promoting green infrastructure. We recommend developing guidelines for the design of green infrastructure in urban areas and identifying implementing pilot projects.”

PRDOH Response: Thank you for your comment. PRDOH will take comments regarding green infrastructure into consideration during further development of infrastructure programs.

“41. The coordination of projects must not only be focused on the planning of traditional projects but must also help the developers, communities and municipalities to obtain financing for access infrastructure which creates resiliency. Some initiatives include: a. community micro-grids through relief/grant/loan/bonds/guarantees (depending on the financial capacity of the communities).

b. Programs for improving compliance with non-PRASA water supply systems.

c. A system for community storage and distribution of water through rainwater collection using bonds/subsidies/relief loans (depending on the financial capacity of the communities) for rural areas.

d. A compliance program for residual water systems for individual and communities using bonds/subsidies/relief loans (depending on the financial capacity of the communities) for rural areas.

e. The access of drainage districts to flood control systems (structural or non-structural) and improvement of storm drains using bonds/subsidies/relief loans (depending on the financial capacity of the communities) for rural areas.

f. Implement the “Dig Once” policy, following regulations for transportation policies financed with federal funds. The “Dig Once” Policy establishes that underground broadband tunnels (plastic tubes through which fiber optic cables flow) must be laid during the construction of any road that receives federal funding.

We would like to thank the Ponce Neighborhood Housing Services, Inc. and the Puerto Rican Association of Builders for their major contributions to the comments which we respectfully submit today.”

PRDOH Response: Thank you for your suggestions. PRDOH will take these into consideration during further development of planning programs outlined in the Action Plan.

Comment: #367_10-19-18_PRODEV

“We would like to begin by extending a particular greeting to all of the communities and thank those local and international organizations which have taken on the task of preparing community leaders to understand and support what the allocation of the CDBG-DR funds means for the conservation of communities and the reconstruction of Puerto Rico. Likewise, we would like to highlight the invitation which Fernando Gil, Secretary of Housing, extended to us as community leaders to include us in the planning discussions at the public hearings and to allow us to share

those discussions with our partner organizations and fellow community leaders. Nevertheless, although we have been included we would like to make it clear that the public hearings convened today claim to serve the entire metropolitan area which includes San Juan, Bayamón, Toa Baja, Cataño, Guaynabo, Dorado, and Toa Alta among other towns which is very difficult to do in the limited time available to give presentations. Regardless of this fact, we are engaged in a constant struggle to have the comments and suggestions of each of our communities heard down to the very last point.

Here today we represent Puerto Rico for the Right to Dignified Housing (PRODEV), a force which emerged from a Community Assembly duly and openly convened on June 16th, 2018 and which brought together community leaders from 45 communities and entities based in 11 municipalities. PRODEV has as its goal fighting for the human right to dignified housing and to stop forced relocations without citizen participation. We are here today presenting PRODEV's points by mandate of the second Community Assembly, which was also duly convened, also without a basis in the participation of people from the communities during the planning and execution of those plans. We would like to cite these same words expressed by the Department of Housing as part of the introduction to the Action Plan: "Citizen participation is crucially important." This must be translated into action and not just words. We are convinced that every effort invested in the reconstruction of Puerto Rico must reinforce physical and human structures, promote growth of the economy and, among other things, secure alternative energy models, ensuring the well-being of community residents and businesses.

Participation in the Third Sector

As a second point it is imperative to recognize the contributions of Puerto Rico's resources to the country's recovery. Among others the contributions of NGOs, communities and universities. Experiencing Irma and Maria has made us experts in creating a design which includes all the necessary provisions to withstand similar future events. We will not hire "opportunists and ambulance chasers" who are only coming to our country to sell their failed products. We propose opening well-thought-out programs to the active participation of this important sector, as opposed to direct distribution."

PRDOH Response: Thank you for your comments. PRDOH is committed to leading a responsible and transparent recovery effort and values the participation of the third sector.

"Continuity of Special Communities

As a third point, approximately 32 projects have been identified which intend to do their work through the Special Communities Trust, these remain pending due to the use of the funds which were allocated for them. Here below are some of them:

- *Adjuntas – Construction of housing in the Rullan Sector and Calle del Agua. Also, rehabilitate the water tank and pumping system in the Saltillo Vaca community.*
- *Aguas Buenas – Rehabilitation and demolition of housing in the Bayamoncito sector*
- *Aibonito – Repair bridge*
- *Ciales – Repair Calle Morovis road infrastructure*

- *Dorado – Parcelas Kuilan construction of a drainage system*
- *Guanica – Electric infrastructure in El Tumbao sector*
- *Guaynabo – Improve roads in Los Filtos community*
- *Tocones Isabela – road infrastructure*
- *Mayagüez – Demolition of housing in the Dulces Labios community*
- *Salinas – Repair bridge in the Coquí sector*
- *San Juan – Rehabilitate community center in the Villa Clemente community*
- *San Juan – Rehabilitation of housing and roof treatments in Valles del Paraíso*
- *Vega Baja – Improvements to potable water system in Algarrobo Perez sector*

We suggest evaluating these projects and complete them in consultation with the community itself. There are more than 700 communities in Puerto Rico classified as special communities. This is the moment to fulfill the commitments made to them on March 1, 2001 and dust off their Action Plans or PDI. We also want to emphasize there is a model in Puerto Rico that involves working with communities to develop their future through participation with the community.

The Importance of Mitigation

As a fourth relevant point, it is important that mitigation be the first option, not the displacement or expropriation of the community. For example, we note the availability of relocation vouchers without allowing the community planning phase to identify relief or re-housing options. We are convinced that the areas currently labeled vulnerable by the Department of Housing through the analysis of the FEMA report have the chance to experience relief at a cost lower than that of mass displacement.

PRDOH Response: As outlined in the Action Plan, HUD has announced a forthcoming allocation of approximately \$8.3 billion in CDBG-DR Mitigation funds, at which time federal guidelines for the use of those funds will be issued. PRDOH looks forward to developing the next phase of comprehensive programs informed by public comment regarding the use of those funds when federal requirements are published. It is possible, but not guaranteed, that suite of programs may include elevation and/or mitigation at the neighborhood level as determined to be cost reasonable, as required by HUD.

“Preference for Local Businesses

As a fifth point we demand that our native businesses with comparable experience and which comply with the local government’s licensing requirements be granted more than 50% of the contracts for the reconstruction of our communities and as such be considered as part of the fair and sustainable economic development of our country.

Likewise, we demand that the labor force contracted to complete community works be made up of no less than 40% of the community's own residents. Furthermore, the assistance program for local contractors is considering up to loans of up to \$50,000 for training. Funds must be set aside to offer free training for small contractors and builders.

We must not forget the bad experiences with Federal agencies during Hugo and George wherein businesspeople and government workers were identified and arrested for misusing funds and benefiting personally. Likewise, the recent situations described in which multimillion-dollar companies which came in the wake of Hurricane Maria and were contracted without having the necessary credentials to undertake the work and thus wasted time and money.

We also understand that in order to build different types of houses and achieve a lasting reconstruction we must continue to consider as part of these processes our universities, especially our University of Puerto Rico architecture clinic, which have proven to be allies of the communities to develop real and safe alternatives.

Housing Materials

As a sixth relevant point, we strongly disagree with the use of prefabricated models that put the health of our residents at risk, as an example – houses built in polychloride of vinyl or PVC. Scientific data from prominent environmentalists such as Juan Rosario and the Puerto Rico Architects Association who state that this model can cause damage to the health of residents and the environment. We will not expose our health to enrich foreign businessmen who are in Puerto Rico only to increase their profits. We want to denounce before these public views that municipalities who are currently using these models should not be reimbursed.

Planning and Densification

As a seventh relevant point, we demand that the construction in our communities does not change the communities' organic planning, building multi-level structures which disrupt community peace and increase the possibility of abandonment of the original residents of the community. Densification is spoken about often, but it should not be at the expense of rural or low-income communities. We demand that communities of differing economic levels are assured of that construction which impacts their environment is not permitted.

The Protection of the Coasts

As the eighth and no less important point our coasts must be protected above all and not left behind with the excuse of tourist development as part of economic development. The beaches are natural resources which belong to all, and especially to the residents of our country.

We are convinced that it is crucial that from Irma and Maria that we learn that the coasts cannot continue to be treated as before, but even more importantly we are convinced that with the participation of the people in the process from beginning to end we will be guaranteed an equitable and effective use of the funds. We believe in an inclusive, fair and transparent Puerto Rico.”

PRDOH Response: As mandated by HUD, PRDOH must follow HUD-approved procurement processes which encourage fair and open competition and comply with 2 CFR 200. PRDOH also looks forward to continued collaboration with the third sector to implement an inclusive and transparent process.

Comment: #368_10-2-18_Ivonne María Marcial Vega (Centro para la Reconstrucción del Hábitat)

Summary: Ivonne María Marcial, Co-Director of Centro para la Reconstrucción del Hábitat, submitted a whitepaper that included comments and recommendations for the Action Plan by program category. The recommendations are explained by section as such:

Substantial Amendment #1:

The objectives as well as the process to accomplish each objective must be included for the designing of the Action Plan. The definition of “reasonable cost” under for the construction cost verification section must be clarified and the costs be verified by a third-party independent architect, civil engineer or a construction manager.

Planning Programs:

Clarification and transparency on the steps of integration and collaboration of the Planning Board, the municipios, and the communities.

Housing Programs:

The Puerto Rico Department of Housing should provide clarification of the definition of a “viable urban community” and “decent housing”. The Action Plan should get rid of any ambiguous wording.

Economic Recovery Programs:

Recommendation to include an economic objective to revitalize downtown areas and develop local economies. Must develop a rent control mechanism or solution to prevent the gentrification in the development of the Re-Grow PR Urban-Rural Agriculture program.

Infrastructure Coordination:

Recommendation increase the amount of funding for the research and development of resilient materials locally. Community emergency centers must remain available year around and available for people of all locations to utilize in emergency situations.

Multi-Sector Incentives:

Inclusion of utilizing vacant and public nuisance structures for the innovative city revitalization programs.

Citizen Participation:

The inclusion of all public commentary for transparency.

General Comments:

The creation of an Action Plan glossary to define every term, concept, and description of criteria in relation that will be attached to the final version of the Action Plan.

PRDOH Response: Thank you for your comments. The Action Plan and substantial amendment were developed in accordance with guidance in 83 FR 5844 and 83 FR 40314.

An appendix of frequently used terms has been added. All citizen comment and response are included in the final draft version of the Action Plan, which was submitted to HUD on November 16, 2018.

Comment: : #369_10-22-18_Giancarlo Gonzalez Ascar (Guawa, LLC.)

Summary: Giancarlo Gonzalez, founder and managing partner, of Guawa, LLC, submitted a proposal detailing the necessity of citizens to have a personal car due to the poorly planned and designed public transportation system, environmental effects, and plan to reinvigorate the “Pisicorre” transportation service. The Guawa proposal includes the use of a digital application to provide transparency and real time information on the location of the transportation units, waiting time and multimodal alternatives on routes. A test phase for locations in old San Juan, Santurce and Hato Rey would be undertaken during the initial steps of the program and a cost estimate for that process has been provided.

PRDOH Response: Thank you for your comment. The Small Business Financing program offers loans or grants to eligible small businesses.

Comment: #370_10-22-18_Israel Roman Martínez (Surcando la historia inc.)

“Surcando la historia inc. A community organization focused not only on history and culture, but also on offering services. All volunteer. We are working on various projects alongside the municipality with a collaborative agreement in Lajas. A kp4 community base which serves as a link between the community and government agencies. There are currently three members with Kp4 licenses and others with GMRS licenses. I am WP4QCH. We have asked I DE for a rural school in Lajas Candelaria, to convert it into a permanent shelter, supply storage, community center, space for educational workshops and a community technology center. We are working on making both projects self-sufficient when it comes to energy and drinking water. We have created links with other organizations to this effect. One crucial project is repairing the irrigation canal for Valle de Lajas. Having been in service for more than 80 years and having received very little maintenance and due to the growth in the area it serves it is crucial for our region and has a small budget, so agencies and community organizations can begin to work on it. The communities are central to this process and weren't created yesterday to get the funds today. We must consider this so that together we can help with the process.”

PRDOH Response: Thank you for your comments. PRDOH agrees that communities are an integral part of the recovery effort and values continued collaboration with communities throughout the life of the grant.

Comment: #371_10-22-18_Marina E Martínez

Summary: Marina E Martínez submitted a proposal titled “Food Truck Para La Economía y Reconstrucción de Puerto Rico” that outlined use of CDBG-DR funding for community and local economy revitalization through creation of small business incubators, the rehabilitation of abandoned parks for the creation of community businesses, rehabilitation of schools and unused structures to provide entrepreneurial classes, labor force food preparation training, certification, local employment creation, and a community recycling program.

PRDOH Response: Thank you for your comment. The Small Business Financing program provides loans or grants to eligible small business and the Business Incubators and Accelerators program aims to provide the framework necessary for small businesses to receive the support they need to thrive. Information about these and other economic development programs is available in the Action Plan.

Comment: #372_10-22-18_Rafael J López Martínez (FIDECOOP)

Summary: Rafael J. López Martínez, acting Executive Director of FIDECOOP, submitted a whitepaper stating the history of FIDECOOP, the cooperative model and its current success in Puerto Rico, and the role FIDECOOP could provide as a strategic partner developing the following programs:

- *Develop Worker Cooperative Initiative: Creation of jobs in various industries.*
- *Low Rent Housing Cooperatives: Provide permanent affordable housing.*
- *Agro-Coops Seed Capital: Provide better access to markets and a higher return for farmers.*
- *Lending Integrated Services Platform for Small Businesses: Facilitate Cooperative Credit and Saving Unions participants to enter in an appropriate and competitive way in the evaluation, concession, and management of commercial credit for local small businesses.*

PRDOH Response: Thank you for your comments. PRDOH has taken these into consideration.

Comment: #373_10-21-18_Lily

“Clarification to the question: The public building is leased to a private non-profit entity. The insurance of this private entity issued a payment for the damages, but this only partially covered the damages caused by Maria. Can I apply with them to this fund for uncovered needs? Thank you for your help.”

PRDOH Response: Opportunities for non-profit entities to apply for assistance are outlined in the Action Plan.

Comment: #374_10-23-18_Eileen Poueymirou Yunqué (Junta de Planificación)

Summary: On 10/23/18, on behalf of the Planning Board, Eileen Poueymirou Yunqué submitted final comments to PRDOH in the form of observations, suggestions, recommendations, requests for opportunities, requests for clarifications, and comments of support.

The Planning Board’s comments are outlined as follows:

Observations:



- *“The method to expand allocations did not adequately consider needs, and instead that it seems to be more in reference to the anticipation of project costs.”*
- *“Puerto Rico is in the need of optimizing fiscal resources as well as in the need of growing such resources and extending project implementation timeframes.”*
- *“The CDBG-DR Plan has not identified what funds will be allocated to these agency support activities for the municipalities that will need them. These will be added tasks that for which agencies might not have provisions in their yearly budgets.”*
- *“The Whole Community Resilience Planning Initiatives based on the partnership model with the Foundation for Puerto Rico as the program Partner is confusing particularly when it seems not aligned with that stated on page 96 that defines partners only as governmental entities and nonprofits are identified as subrecipients.”*

Suggestions/Recommendations:

- *PRDOH should “use comprehensive approach in the use of CDBG funds to address reconstruction”*
- *“Program actions must be conceived and intended to improve resiliency for Puerto Rico as a whole.”*
- *PRDOH should “not provide assistance to improve properties in floodways instead it should be promoted that people live in land away from harm’s way.”*
- *“Relocation should not take place without the input and consideration to people being impacted.”*
- *PRDOH should “utilize alternatives to improve interventions in alignment with a Wholesome Puerto Rico Recovery Strategy which will recognize challenges in the near future and correspond to a better Puerto Rico.”*
- *PRDOH should seek these goals:*
 - *Puerto Rico will be able to “anticipate the costs of development while having less land options and being in the need of optimizing the use of resources according to future needs – food, water, energy, housing, transportation, security.”*
 - *“Improving life quality to those who live on the island with initiatives and investments that may attract population to the locality not only as a tourism destination but as a place to live.”*
- *Code enforcement is recommended not only from experience, but in anticipation of future need.*
- *Because hazards and risks can change in time, it is important that short terms be addressed yet solutions be worked in anticipation of future risks.*
- *“Other options for approaching flood hazard, besides elevation standards, may result in a more sound approach to address not only housing but community instead.”*

- *It is important to give Planning the greatest consideration possible, thus the allocation of funds to Planning initiatives and programs should be increased to the highest allowable amount.*
- *Allocations should be directly related to needs and not to pre-assumptions of cost.*
- *“There should be opportunities to finance activities through banking initiatives that in turn also have requirements towards serving LMI population.”*
- *“The allocation ceiling should be removed and shall be directly dependent on identified needs.”*
- *“Specific roles need to be identified for each entity assisting this process because ‘collaboratively’ does not consider costs related to activities within this intention.”*
- *We suggest that including “confirmed damage to properties” as a requisite will not necessarily address real needs and will not allow for community improvement initiatives as a whole.*
- *“Limiting [the Home Repair, Reconstruction or Relocation Program] to single family addresses challenges for an incomplete initiative”*
- *“Title expenses should not be allocated for [properties located in the floodplain, floodway, or landslide risk area, unless title clearance is necessary for relocation], instead they should be a waived requirement (consider that funding for relocation already represents a benefit to the participant which is equal or over the cost of acquiring their property.”*
- *“It will be important that Economic Development be promoted following and adopted ECONOMIC MODEL for Puerto Rico, if not questions that can be posed will be in relation to whom Plans and strategies benefit, it will not be understood well at what geographic scale or what are the emphasis given to different sectors within the considerations of competition possibilities, not only locally but among other states of the US and internationally These topics require analysis and references to Puerto Rico Economic Accounts and its roles, treatment and participation within the Nation. Ensuring economic development must address corporate economy as well as small business and the possibilities and impacts of promoting development of particular sectors.”*
- *“All of the CDBG-DR proposed ECONOMIC PROGRAMS should follow a PLAN FOR PUERTO RICO’S ECONOMIC DEVELOPMENT constructed in a comprehensive and integral manner including impacts on social and physical development.”*
- *“[FEMA Coordination funds] must be applicable to Planning funds that are part of the CDBG-DR allocations and that they also include implementation activities as defining Guidelines and Rulings as well as activities pertaining enforcement of such provisions. Among such initiatives will be the Municipal Hazard Mitigation Plans and the Code Enforcement Programs both under the purview of the Puerto Rico Planning Board.”*

Requests for opportunities:

- *“Pages 95, 96, 97, 98, 99 include an important array of guidelines that will need to be overviewed by effective program management for which also Planning as a discipline can assist with an adequate PERFORMANCE AND FINANCIAL MANAGEMENT TOOL LINKING CDBG-DR OBJECTIVES AND COMPLIANCE TO THE RECOVERY PLAN. This can be an initiative assisted by the Puerto Rico Planning Board in the use of other planning funds not yet allocated.”*

Requests for clarification:

- *“Will initiatives cover all 78 municipalities since risk factors have been identified in almost 100% of the municipalities at different levels and with varied capabilities?”*
- *“Will this amount allow contracting private consultants or government personnel expenditures and activity related costs?”*
- *“Will [the allocated program] amount allow contracting private consultants or government personnel expenditures and activity related costs?”*
- *How will continued municipal partnerships will be formalized?*
- *Will municipal Plans be adopted by the state and will implementation have continued overview?*

Comments of Support:

- *“CDBG-DR Plan is well oriented towards reconstruction approaches through lessons learned and by including a wide variety of alternatives to assist all sectors in Society.”*
- *Many objectives stated in the CDBG-DR Plan are well understood and encouraged:*
 - *“regional collaboration.*
 - *Partners may include governmental agencies or governmental organizations.*
 - *PRDOH should oversee vendor procurement and subrecipient selection processes conducted by Partners, as applicable*
 - *Subrecipient means a public or private nonprofit agency, authority, or organization, or a for-profit entity authorized under §570.201(o),*
 - *PRDOH is the responsible entity for subrecipient compliance and performance and Environmental Review under 24 CFR Part 58.*
 - *Low- to moderate- income households are defined as households that do not exceed 80% of the median income for their area*
 - *PRDOH plans to minimize displacement of persons or entities and assist persons or entities displaced as a result of implementing a project with CDBG-DR funds*
 - *PRDOH plans to exercise the waivers set forth in Federal Register/Vol. 83, No. 28/Friday, February 9, 2018 pertaining to URA and HCD Acts.*
 - *Through the Residential Anti-displacement and Relocation Assistance Plan (RARAP), PRDOH will consider “demonstrable hardship” as exceptions to program*

policies, including post assistance affordability requirements for the single-family program, for applicants who demonstrate undue hardship.”

PRDOH Response: Thank you for your comments and support. PRDOH values its partnership with the Planning Board and looks forward to continued collaboration with the Planning Board throughout the life of the recovery effort. The Action Plan has been reviewed and updated to incorporate feedback received during the public comment period.

Comment: #375_10-23-18_ Noelia García (Puerto Rico Convention Center Authority)

Summary: Puerto Rico Convention Center Authority (PRDCA), Noelia García submitted comments to the CDBG-DR amended action plan alongside project proposals. The project proposals are outlined as follows:

“As a key stakeholder within the Public Buildings sector, the PRCDA, in coordination with the Central Office of Recovery, Reconstruction and Resiliency (“COR3”), is diligently working to address the long-term recovery needs for community and capacity building at key development areas such as the Convention District and Bahía Urbana. The projects and initiatives provided below include the top ten projects prioritized by the PRCDA as part of its strategic plan for infrastructure recovery, reconstruction and resiliency. These projects will require significant funding and must be included in the proposed CDBG-DR programs as provided below:”

“Project Name: Bahía Urbana Redevelopment

Project Description: Project includes, but is not limited to, master development services, planning, permitting, environmental mitigation, remediation, demolition, site preparation, civil works, city parks, construction and planning of new streets, pedestrian walkways, bridges, infrastructure and community development works at all its Parcels.

- *Estimated Cost: \$250 M*
- *Development Timeline: 3-4 years*
- *Target Completion: 2022*
- *CDBG-DR Program Eligibility: Economic Development Investment Portfolio for Growth; City Revitalization; Puerto Rico by Design (PR Design-Build)*

Project Name: Convention District Development

Project Description: Project includes, but is not limited to, environmental mitigation, remediation, demolition, and site preparation works at Parcel L; the development of Parcel I into an innovative, world-class entertainment destination for San Juan; preservation of historic structures, parking development, infrastructure and construction works in various parcels.

- *Estimated Cost: \$80 M*
- *Development Timeline: 3-4 years*
- *Target Completion: 2022*

- *CDBG-DR Program Eligibility Economic Development Investment Portfolio for Growth; City Revitalization;*
- *Puerto Rico by Design (PR Design-Build)*

Project Name: Development of San Juan Bayside Area

Project Description: Project includes, but is not limited to, land acquisitions, environmental mitigation, remediation, demolition, site preparation, development and construction works. This project will enable the extension of the Convention District (towards the southeast), integrating Miramar Sur (e.g. Parque Central and Sector Hoare) to become a world-class destination for tourism, residential, commercial, and entertainment.

- *Estimated Cost: \$100 M*
- *Development Timeline: 4-5 years*
- *Target Completion: 2023*
- *CDBG-DR Program Eligibility: Economic Development Investment Portfolio for Growth; City Revitalization; Puerto Rico by Design (PR Design-Build)*

Project Name: Isla Grande Microgrid Development

Project Description: Project consist of the design, construct and operate an microgrid energy solution to serve the Convention District and the San Juan Ports areas, and to strengthen energy reliability, security and resiliency for critical infrastructure facilities.

- *Estimated Cost: \$60 M*
- *Development Timeline: 2-3 Years*
- *Target Completion: 2021*
- *CDBG-DR Program Eligibility: Critical Infrastructure Resilience*

Project Name: People Mover from SJU Airport to Isla Grande Ports and Convention District

Project Description: Design, construct and operate a people mover transportation system connecting the SJU Airport to the Convention District, Bahía Urbana, San Juan Ports, Condado and Miramar districts. Note: Project also requested as a priority for the Puerto Rico Ports Authority (PRPA), and the Transportation Sector.

- *Estimated Cost: \$2.0 B*
- *Development Timeline: 4-5 years*
- *Target Completion: 2022*
- *CDBG-DR Program Eligibility: Economic Development Investment Portfolio for Growth; Critical Infrastructure Resilience*

Project Name: Infrastructure Resiliency and Hazard Mitigation Projects at Critical Facilities



Project Description: Projects include but are not limited to damage repairs, hazard mitigation and resiliency initiatives at the Puerto Rico Convention Center, and the Puerto Rico Coliseum, among others.

- *Estimated Costs: \$20 M*
- *Development Timeline: 2-3 Years*
- *Target Completion: 2021*
- *CDBG-DR Program Eligibility: Critical Infrastructure Resilience”*

PRDOH Response: Thank you for the comments. Information regarding how to apply for the CDBG-DR programs referenced will be available at www.cdbg-dr.pr.gov, as part of program guidelines, after HUD approves the programs.

Comment: #376_10-21-18_Luisa Rosario Seijo Maldonado (Instituto Universitario para el Desarrollo de las Comunidades)

Summary: On 10/21/18, On behalf of the Instituto Universitario para el Desarrollo de las Comunidades, Luisa Rosario Seijo Maldonado submitted a letter of recommendations toward the CDBG-DR Action Plan. The comments are outlined as follows:

Citizen Participation:

- *Assemblies and meetings should be organized in each municipality in the different sectors (neighborhoods, neighborhoods and urban areas) through coordination with existing organizations.*
- *The Alliance of Community Leaders, CEDICE, Leaders of the Environmental Movement, Agroecological Groups, Women's Broad Movement and community-based organizations, Mutual Support Centers, as well as faith-based organizations, among others, should be coordinated as collaborators in these processes.*

UPR Participation:

- *The University of Puerto Rico in its Campus has faculty and students who have assumed an active role in research projects and service-learning in communities during this recovery period. These resources should be extensively utilized during the recovery process.*

Citizen Outreach:

- *This access must be available in all communities, over all the most vulnerable and impoverished sectors, in neighborhoods, neighborhoods and urban areas.*
- *The Public Internet is necessary for the entire population as a right to access information.*
- *Technological Centers accessible to the entire population should be prepared through training for adults, youth and seniors with schedules throughout the day.*

Women Participation and Involvement:

- *The Action Plan does not clearly establish programs that respond to the challenges that this population faces.*
- *The participation of women in the processes of economic and social production is a core issue in the recovery of Puerto Rico.*
- *Services and support programs must be guaranteed that guarantee incorporation into economic development through business incubator programs, as well as the establishment of Integral Development of Children in communities and care programs for Older Adults.*
- *Support and Promotion Centers should be established for the Integral Development of Women in the communities, neighborhoods and urban areas that promote their well-being and that of their families, as well as allowing them to integrate into the processes of economic and social production.*

PRDOH Response: Thank you for the feedback regarding the citizen participation process. The public hearing process and public comment period was open to the public and resulted in a wealth of information exchanged. Hundreds of submittals from the public were received. Although each proposal may not have been referred to by name in the Action Plan, all submittals have been reviewed carefully by PRDOH and were considered in the development of the plan. Notification of public hearings was advertised on social media, in the newspaper, and in circulated newsletters, in addition to being posted on the PRDOH website, www.cdbg-dr.pr.gov. PRDOH’s Citizen Participation Plan can be found in Spanish and English at the same website.

Comment: #377_10-21-18_Anthony O. Maceira Zayas (Puerto Rico Ports Authority)

The following is a summary of the comments received from PRPA that outline their suggested priority projects that should be considered and prioritized for infrastructure recovery, reconstruction and resiliency, utilizing CDBG-DR funding. More specifically, the projects submitted include the implementation of major re-developments, energy and resiliency improvements across the tourism areas, all island airports, and critical infrastructure across the island. PRPA has asked that the below projects be included in the amended action plan and presented to HUD for the use of CDBG-DR funds. PRPA also asks that the use of funds support these projects and be used to match and compliment FEMA PA and HMGP monies to leverage the best use of resources and address long term recovery needs.

“Luis Munoz Marin International Airport (SJU) Microgrid Project:

Description: Design and implementation of a microgrid that strengthens the energy reliability and resiliency. Pre-development work completed includes, technical and economic feasibility studies, conceptual engineering designs and legal due diligence. Ready for procurement.

Cost: \$30M

Development Timeline: 1-1.5 Yrs. (Target Completion: 2020)

Program Eligibility: Critical Infrastructure Resilience & Economic Development Investment Portfolio for Growth;

Data Analytics & Technology Integration Projects

Description: Integration of data analytics and technology tools, including visualization tools to enhance Port Authority operations and reporting, allowing the development and transparency into performance metrics, cost strategies, statistics, etc.

Cost: \$5M

Development Timeline: 1-1.5 Yrs. (Target Completion: 2020)

Program Eligibility: Economic Development Investment Portfolio for Growth

Piers 11-14 Re-development

Description: Demolition and reconstruction of new pier in place of the current, in efforts to increase the operational capacity of the cruise ports and infrastructure.

Cost: \$150M

Development Timeline: 2-3 Yrs. (Target Completion: 2021)

Program Eligibility: Critical Infrastructure Resilience & Economic Development Investment Portfolio for Growth;

Aguadilla Airport Re-development

Description: Revamp runways, taxiways, apron areas, terminals and other areas of the airport to increase capacity, boost tourism and improve operational continuity. This project will also include installation of improved generators, renewable energy technologies and code/industry improvements.

Cost: \$50M

Development Timeline: 2-4 Yrs. (Target Completion: 2022)

Program Eligibility: Critical Infrastructure Resilience & Economic Development Investment Portfolio for Growth;

Pier 4 Re-development

Description: Demolition and reconstruction of new pier in place of the current, in efforts to increase the operational capacity of the cruise ports and infrastructure.

Cost: \$135M

Development Timeline: 3-4 Yrs. (Target Completion: 2022)

Program Eligibility: Critical Infrastructure Resilience & Economic Development Investment Portfolio for Growth;

Request for Expanded Air Cargo Transfer Options (Exemptions before the DOT)

Description: Application for expanded cargo/passenger transfer ability a. Online cargo/passenger transfer, change of gauge for cargo/passenger operations, commingling of cargo/passenger

transfer, interline cargo/passenger transfer to/from US carriers, interline cargo transfer to/from international carriers.

Cost: \$0.5M

Development Timeline: 1.5Yrs (Target Completion: 2022)

Program Eligibility: Economic Development Investment Portfolio for Growth;

Pan-American Piers Re-development for Resilient Cruise Ports

Description: Project considers the potential demolition of existing piers and the development of a new pier structure, and the addition of a third (3rd) pier, addressing damages, hazard mitigation and resiliency improvements needed.

Cost: \$250M

Development Timeline: 2-3Yrs (Target Completion: 2021)

Program Eligibility: Economic Development Investment Portfolio for Growth;

San Juan Ports/Isla Grande Airport Microgrid

Description: Design, construct and operate an microgrid energy solution at the San Juan Ports and Convention District areas to strengthen energy reliability, security and resiliency at critical infrastructure facilities.

Cost: \$60M

Development Timeline: 2-3Yrs (Target Completion: 2021)

Program Eligibility: Economic Development Investment Portfolio for Growth;

Ponce Airport Re-Development

Description: Revamp runways, taxiways, apron areas, terminals and other areas of the airport to increase capacity, boost tourism and improve operational continuity. This project will also include installation of improved generators, renewable energy technologies and code/industry improvements.

Cost: \$25M

Development Timeline: 1-3 Yrs. (Target Completion: 2021)

Program Eligibility: Critical Infrastructure Resilience & Economic Development Investment Portfolio for Growth;

Vieques Airport Re-development

Description: Revamp runways, taxiways, apron areas, terminals and other areas of the airport to increase capacity, boost tourism and improve operational continuity. This project will also include installation of improved generators, renewable energy technologies and code/industry improvements.

Cost: \$15M

Development Timeline: 1-3 Yrs. (Target Completion: 2021)

Program Eligibility: Critical Infrastructure Resilience & Economic Development Investment Portfolio for Growth;

Ports & Airport Consolidation

Description: Revampment project that includes design and re-development of existing infrastructure, as well as the acquisition of new assets to increase the effectiveness and flexibility of the transportation system at large.

Cost: 80M

Development Timeline: 1-3 Yrs. (Target Completion 2020)

Program Eligibility: Economic Development Investment Portfolio for Growth;

Development of Parcel L8 at Convention District

Description: Demolition and redesign of the port to boost tourism and make resiliency improvements.

Cost: 80M

Development Timeline: 1-3 Yrs. (Target Completion 2020)

Program Eligibility: Economic Development Investment Portfolio for Growth;

Development of Bahia Urbana Bayfront

Description: Environmental remediation and redesign of the port to boost tourism and make resiliency improvements.

Cost: 250M

Development Timeline: 3-5 Yrs. (Target Completion 2022)

Program Eligibility: Economic Development Investment Portfolio for Growth;

People Mover from SJU Airport to Isla Grande Ports and Convention District

Description: Design and implementation of microgrid systems that strengthens the reliability and resilience of the infrastructure and neighboring communities.

Cost: 2B

Development Timeline: 4 -5 Yrs. (Target Completion 2022)

Program Eligibility: Economic Development Investment Portfolio for Growth;

Rafael Hernandez Airport (Bon – Aquilla) Microgrid Development

Description: Environmental remediation and redesign of the port to boost tourism and make resiliency improvements.

Cost: 250M

Development Timeline: 3-5 Yrs. (Target Completion 2022)



Program Eligibility: Economic Development Investment Portfolio for Growth; Critical Infrastructure Resilience & Economic Development Investment Portfolio for Growth;

Puerto Nuevo Ports Microgrid

Description: Design and implementation of microgrid systems that strengthens the reliability and resilience of the infrastructure and neighboring communities to the ports and convention district.

Cost:40M

Development Timeline:1 -2 Yrs. (Target Completion 2021)

Program Eligibility: Economic Development Investment Portfolio for Growth; Critical Infrastructure Resilience

Culebra Airport Re-development

Description: Revamp runways, taxiways, apron areas, terminals and other areas of the airport to increase capacity, boost tourism and improve operational continuity. This project will also include installation of improved generators, renewable energy technologies and code/industry improvements.

Cost: 6M

Development Timeline:1 -2 Yrs. (Target Completion 2021)

Program Eligibility: Economic Development Investment Portfolio for Growth; Critical Infrastructure Resilience

People Mover from SJU Airport to Isla Grande Ports and Convention District

Description: Revamp runways, taxiways, apron areas, terminals and other areas of the airport to increase capacity, boost tourism and improve operational continuity. This project will also include installation of improved generators, renewable energy technologies and code/industry improvements.

Cost: 2B

Development Timeline:4 -5 Yrs. (Target Completion 2022)

Program Eligibility: Economic Development Investment Portfolio for Growth”

PRDOH Response: Thank you for the comments. Information regarding how to apply for the CDBG-DR programs referenced will be available at www.cdbg-dr.pr.gov, as part of program guidelines, after HUD approves the programs.

Comment: #378_10-29-18_Junta de Gobierno (UPR)

Summary: UPR submitted comments of support, suggestions, and recommendations to the Action Plan alongside requests for participation and new program proposals. The comments are outlined as follows:

“Planning for Economic Recovery:

- *The University of Puerto Rico should be included as one of the entities eligible for this purpose, being the main teaching center of the country and having 11 campuses around the island. The University has the resources to offer expertise and experience in planning and socioeconomic development.*

Home Resilience Innovation Competition:

- *PRDOH should increase the amount assigned to \$ 1SM, which will allow greater reach and agility to develop innovations in multiple areas.*

Small Business Incubators and Accelerators:

- *PRDOH should give priority to businesses close to the University of Puerto Rico and to the programs and infrastructure within the University of Puerto Rico in its 11 campuses around the island.*

Economic Development Investment Portfolio for Growth:

- *PRDOH should include the University of Puerto Rico as an eligible recipient under this program.*

Re-Grow PR Urban-Rural Agriculture:

- *The University of Puerto Rico should be eligible with a specific allocation assigned (\$ 33M). The University Campus of Mayagüez has with the College of Agricultural Sciences, which includes the Agricultural Extension Service. the College has the Agricultural Experimental Station whose specialty is agricultural research. Among the specialty subjects of these programs is food safety, improvement and expansion of agricultural production with economic revitalization and development.*

Community Resilience Centers:

- *The University of Puerto Rico should be included as an administering entity for the purpose that student centers can be trained to serve as community resilience centers.*

City Revitalization Program:

- *The university of Puerto Rico should be priority zones under this program due to the fact that universities have a direct impact on economic activity in the respective municipio.*

Puerto Rico by Design:

- *The sector of university academics, including the University of Puerto Rico should be included as potential projects under this program.*

New Program Proposal: PROGRAMA PARA FOMENTAR LA EDUCACIÓN EN PREPARACIÓN Y MANEJO DE EMERGENCIA, RESILIENCIA, SUSTENTABILIDAD Y EMPRESARISMO

- *Allocation Amount: \$5,000,000 - \$10,000,000*
- *Administering Entity: Universidad de Puerto Rico*
- *National Objectives: LMI, UN, SB*

- *Timeline: Duration of the grant*
- *Goal: Address a shortage of professionals in the area of disaster preparedness in Puerto Rico.*

New Program Proposal: PROGRAMA PARA FOMENTAR LA INVESTIGACIÓN EN ENERGÍA RENOVABLE, SALUD PUBLICA, VIVIENDA Y RESILIENCIA

- *Allocation Amount: \$5,000,000 - \$10,000,000*
- *Adminstering Entity: Universidad de Puerto Rico*
- *National Objective: UN*
- *Timeline: Duration of the grant*
- *Goal: Develop new strategies and resilience products and materials that address the problems that arose in the face of the impact of hurricanes.”*

PRDOH Response: Thank you for your suggestions. PRDOH values its partnership with UPR and looks forward to a continued positive working relationship with UPR throughout the life of the grant. The Action Plan has been updated to incorporate feedback received during the public comment period.

Comment: #379_10-29-18_Marilyn Santos Colón (Municipio de Barranquitas)

Summary: The Federal Programs Office of the municipio of Barranquitas, submitted a whitepaper with two activities to be funded under CDBG-DR. The following projects are:

- *Improvements to the municipal commentary La Vega*
- *Remodeling of touristic attractions (Paseo Lineal y Mirador Turístico)*

PRDOH Response: Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #380_10-24-18_Michelle Rodríguez Maldonado (Niños de Nueva Esperanza)

Summary: Executive Director of Niños de Nueva Esperanza, Inc., submitted a proposal which included a brief description of the non-profit’s history, accomplishments, and needs for the children and families of Sabana Seca. Niños de Nueva Esperanza, Inc., proposed the “Empowering Sabana Seca” project to be funded by CDBG-DR. The project consists of educative and preventative workshops, physical and mental health services, providing aid and items of need to the youth and family members of the community.

PRDOH Response: Thank you for your suggestion. NGOs are eligible to apply for funding under several programs. Please consult the Action Plan for more information.

Comment #381_10-25-18_Edgar Casanova (Municipio de Yabucoa)

Summary: Municipio of Yabucoa submitted a proposal which included the impact hurricane María had on the municipio and the activities to be funded under CDBG-DR.

Housing:

- *Relocation of citizens living in the Pesquera de El Negro Community.*
- *Acquisition and rehabilitation of vacant and public nuisance structures for housing.*
- *Incentive program for the acquisition of social interest housing.*
- *Rehabilitation of households for title owners.*
- *Construction of senior citizen housing.*

Infrastructure:

- *Construction of sanitary sewer system.*
- *Acquisition and installation of renewable energy in communities.*
- *Acquisition of land and construction of municipal cemetery.*
- *Channelization of bodies of water.*
- *Construction of emergency response center and refuge.*

Economic Recovery:

- *Construction of seawalls.*
- *Renovations to touristic attractions such as la Plaza del Maestro and the municipal bodies of water.*

PRDOH Response: Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Programs outlined in the Action Plan are not geographically restricted within Puerto Rico. Residents of Yabucoa may be eligible to receive assistance. The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #382_10-26-18_Rodriguez Cintrón (Asociación de Productores de Pollos to Ricos)

Summary: The letter submitted highlights the importance of the poultry industry as part of the economic development of Puerto Rico, with the creation of jobs and food security of PR. They propose the construction and / or repair of thirty-seven (37) ranches.

Their “Request for Proposals for the Construction of Ranches for Raw Chicken Farming” from the Asociación de Avicultores provides an overview of provides a comprehensive overview of the need,

the justification, the project description, quotations, a summary of the damages caused and their concluding remarks. The project proposed requests funding for the construction and rehabilitation of chicken ranches.

PRDOH Response: Thank you for your comment. The Re-Grow PR Urban-Rural Agriculture program outlined in the Action Plan may provide assistance to urban or rural, large- or small-scale agriculture, livestock or aquaculture installations. Interested parties should monitor www.cdbg-dr.pr.gov for information about project eligibility as it becomes available.

Comment: #383_10-22-18_Osiris Torres (La Asociación de Empleados Municipales)

“COMMENTS - Housing Action Plan / Funds CBDG-DR / DR-4336

The Association of Municipal Employees of Ponce, Local 8198 of the United Steelworkers,

The following comments were received from the United Steelworkers Local 8198 of The Association of Municipal Employees of Ponce, with a strong request for much consideration for the Municipality of Ponce and its priority projects.

Priority Projects Submitted:

1. Urban Areas

a. Facilitation of the repopulation of urban area, purchase of properties, acquisition of slum and blighted properties, granting of property titles and economic development.

If Ponce implements the tools provided and established by the Law 91-1991 as amended and the changes to the civil code, CRIM law and Law 31-2011, which are included in the Master Development Regulation, the proposed first project should be successful. However, the following should also be considered:

- *PRDOH should establish a Voluntary Acquisition, Design, and Implementation program that provides a structured process to acquire properties that are inhabitable.*

- *PRDOH should establish a Demolition and Administration program for abandoned property where:*

- o Abandoned property for over 10 years and no heirs can be acquired/demolished.*

- o Expropriation of encumbrances whose property debts before the CRIM and mitigation debts reduce the fair compensation at a very low cost or at \$ 0 as they approach, match or surpass the value of the property in the market. (* In real property debts only, there is approximately \$ 718,528.72 without counting those exempt properties that can be taxed from the declaration of hindrance and without counting mitigation debts that, to date, amount to approximately \$ 787,591.71 and increasing).*

- o Execution of judgement and liens for mitigation in public auction*

- o Execution of mitigation debts after registration as a legal tacit mortgage concept*

- o Negotiation of obstacles belonging to the DOH and banks through resource transfer of assets or agreements*

o Municipalities can group properties into trusts that retain title and manages the site, allowing for additional time and develop on these plots for social interest initiatives

o In addition, housing projects for rent under Section 8 managed by the Municipality itself through a municipal non-profit corporation or corporation can be developed in the future to increase the availability of these homes in the urban area.

o CBDG-DR funds provide for demolitions and clean-ups within the planning done for each particular project. In the same way it can be done with properties that comply with the requirements of brownfields funds to gain access to funds from the EPA as well as coordinate with the CDFI (Community Development Financial Institutions) existing in Puerto Rico for the development of other initiatives with Treasury funds.

In fact, in Ponce there is ONE CDFI, namely: Ponce Neighborhood Housing, a non-profit entity that could be an excellent ally in these processes as well as other entities that exist locally and nationally and that the Municipality may not know .

o Schools abandoned by the Department of Education as well as some historic buildings in the city belonging to private entities can be developed with portions of the CBDG funds for community facilities, historical preservation, development of public facilities and subsidies for model cities.

b) Repopulation of the Urban Casco and Economic Development

• If we focus the aforementioned programs on the urban area and create efficient and cost-effective partnerships, such as the School of Architecture of the PUCPR, to mention one, we can work on short, medium and long term projects that will not only repopulate the urban center of the city but make it attractive for the investment of small and medium merchants as well as for the tourist who comes to visit us and to walk our streets and amenities on foot.

• A structured plan is needed that addresses the need to create spaces of tourist attraction, rest, free expression, local commerce and housing that give back both day and night life to our Urban Center, integrating the community leaders of the area, the merchants, the schools, the cultural leaders, the Department of Housing and the Department of Socioeconomic development to delimit what the pressing needs are and work them efficiently, while addressing the general concerns of citizens. Likewise, a proactive team should be counted on to identify funds and work on related proposals, so that the development of the Casco Urbano is a reality before 2022.

• In this scenario the Municipality could well work projects that result in recurring revenues to the municipality that allow improving services and return the full time to employees.

• Among the recurring revenues that could benefit the Municipality are:

✓ Lease of real property belonging to the Municipality;

✓ Increase in the acquisition of Patents

✓ Increase in the collection of income by concept of Municipal IVU

✓ Increase in the collection of construction taxes

✓ Increase in the collection for the payment of permits

✓ *Creation of small municipal companies (tourism, housing, etc.)*

2. SECOND PROJECT: PONCE COASTAL ZONE

Construction projects and housing rehabilitation, economic development and delivery of titles without specifying which are the short, medium and long term plans to activate them. It only limits itself to establishing that the project will include 515 units in the Coastal Zone, of which 109 will be new construction and 410 of rehabilitation but does not mention the communities in particular or detail sectors and funds for each one.

In this sector of the Coastal Zone of Ponce, there are only approximately 50 public sewers already declared under the previous Ordinance, # 70 Series 2015-2016 and there must be many more present and after the onslaught of Hurricane Maria. Implementing a plan similar to the one briefly explained in the previous paragraph would not only be cost efficient, but would also benefit the citizens as well as the municipal coffers in general, as well as increasing not only housing spaces, but also those available for optimum trade development. local in the hope that finally develop and not continue to stagnate the Port of the Americas.

3. THIRD PROJECT: PONCE RURAL AREA

This third project, like the previous two, proposes repair and construction of housing, but adds special housing for the homeless. However, it does not detail the communities to impact or the number of people who could benefit and whether there will be a combination of funds such as CoC (Continuum of Care) and CBDG-DR to name a few. These projects could also benefit from the timely identification, mitigation and acquisition of public encumbrances, with rural areas being the most affected in terms of housing infrastructure and those that have abandoned lots and structures due to the inhospitable nature of providing services and utilities.

In communion with the community leaders of each rural area, the urgent needs must already be identified and those that can be met in the medium and long term. Among them, the immediate housing needs and viable rehabilitations. However, the plans for each community must include self-sufficiency, road and transportation infrastructure (extension of the SITRAS program) as well as projects that allow abandoned schools to be reused as Immediate Response Community Centers and as Virtual Libraries where citizens have access to public services. available on the network for a small fee through agreements with giant companies such as Google and Facebook owners who have publicly expressed interest in this type of project aimed at disadvantaged communities.

Community water wells with renewable energy systems are a great success. However, they do not express how they will provide such services and what the short, medium and long-term plans are. Currently there are community water wells in almost all rural communities with the limitations that lack of energy and droughts can create. In fact, this Administration announced in 2010 that it would work on the famous Acueducto del Norte, a project initiated by the late mayor Rafael Churumba Cordero, to provide drinking water to all rural communities in agreement with the AAA. However, eight years have passed since that commitment, funds have been requested to but rural communities have not seen any improvement or anything that comes close to what was announced on countless occasions with great fanfare.

Need for road rehabilitation

Many of our rural communities have narrow roads, near ravines with landslides on both sides or with obstructed steps. Very little has been done in this respect and the Priority Plan of the Municipal Administration establishes nothing in this regard, an aspect that is vital to provide access to services and housing that the Administration plans for this sector.

In summary, our organization brings together municipal employees who know first-hand how we can improve the plan proposed by the Municipal Administration in order to not only provide a better service and create a future for our citizens and our communities, in addition to guaranteeing our enrollment and other employees Municipalities a full and fair day, with a decent salary. However, we do not count on us when presenting this type of projects and proposals where our experience, vision and passion could well serve the benefit of all.

We urge the Mayor and the other mayors at the island level as well as the Department of State Housing to focus their energies in the right direction: towards the acquisition and rehabilitation of effective public encumbrances and vacant spaces with the collaboration and participation active of its main asset, its employees.”

PRDOH Response: Thank you for your comment. Infrastructure projects may be eligible for assistance under the FEMA Coordination, Critical Infrastructure Resilience, or City Revitalization programs.

Comment: #384_10-19-18_Antonio Rosario

Summary: Antonio Rosario submitted a proposal which summarized the impact of Hurricane Maria and suggested activities to be funded under CDBG-DR. Antonio Rosario suggests the following activities be funded under CDBG-DR funds.

Infrastructure projects:

- *Support for the Construction of microgrids in Caguas.*
- *Use CDBG-DR funding as a 20% stake in the financing of the project.*
- *Leverage CDBG DR funding with Solar Investment Tax Credits which will provide a leverage of \$5 to \$1 (CDBG-DR).*
- *Partner with Community Based Development Organizations who will own and purchase the equipment provided.*
- *Provide energy to LMI communities.*
- *Support for a Community Center that is self-sufficient.*
- *Support for an ecological garden that also serves the needs as a marketing space for local agriculture business, local tourism growth and historic preservation of indigenous petroglyphs.*

Economic Development projects:

- *Support for the microgrid project mentioned above which could create jobs in the installation, operation and maintenance of the system.*

PRDOH Response: These project proposals, suggestions, and recommendations have informed PRDOH during the development of Infrastructure Programs, Community Resilience Centers, the City Revitalization Program, and Economic Recovery programs. PRDOH understands that recovery is multi-faceted and is committed to administering a collaborative, transparent recovery.

Comment: #385_10-19-18_Miguel Roman Portalatin & Ana R. Zeno Cappas

Summary: Miguel Roman Portalatin & Ana R. Zeno Cappas submitted a public comment which suggests the following activities be funded under CDBG-DR funds.

Housing:

- *Half of the value of their residence Quintas de Dorado Calle Cipres N5, Dorado PR 00646-4723 and cover the cost of demolition due to the declining value of the home, the condition of public infrastructure in that area and their living wages as a retired elderly couple.*

Additional Comments:

- *They also request exemption reconsideration of their CRIM payment of \$2,380.00 annually*

PRDOH Response: These projects and activities have informed PRDOH during the development of the Home Repair, Reconstruction or Relocation Program. PRDOH understands the importance properly repairing the condition of public infrastructure and is committed to pursuing projects that will create long-term resilience to natural disasters and hazards.

Comment: #386_10-19-18_E & F Development

Summary: E & F Development suggests the following activities be funded under CDBG-DR funds. A total of \$86,373,074.00 is requested across all proposed projects laid out below.

Infrastructure:

- *City Gardens Project to serve as an edible landscaping or "foodscaping" pilot project for the development of agro-tourism and culinary tourism which will include:*
- *Conference Room Space for hosting*
- *Educational events*
- *Corporate events*
- *Private events*
- *Coffee Shop*
- *Vendor area for the fruits/ vegetables/ herbs/other sowed in the garden*

- *Propagation Greenhouse*
- *Passive recreation spaces with water fountains*
- *Planting banks*
- *Fruit and vegetable exhibit*
- *Sustainable elements such as:*
 - *Compost for organic waste to be used as fertilizer*
 - *Rainwater recollection system to supplement irrigation*
 - *Installation of solar panels for lighting structures*

Economic Recovery:

- *City Garden Project as described above working with local not for profits on the administration of the space.*

PRDOH Response: These proposed projects and activities have informed PRDOH during the development of Infrastructure and Economic Recovery Programs. PRDOH, through the Re-Grow PR Urban-Rural Agriculture Program, is committed to promoting and expanding island-wide food security and addressing the impacts to damages agriculture productivity. PRDOH, through the City Revitalization program, is committed to encourage tourism by addressing the needs of community businesses and downtown areas. Currently available information regarding these programs and program sectors is outlined in the Action Plan.

Comment: #387_10-19-2018_Municipio de Arroyo

Summary: Municipality of Arroyo submitted a proposal which summarized the impact of Hurricane Maria and suggested activities to be funded under CDBG-DR. Arroyo suggests the following activities be funded under CDBG-DR funds.

Housing funds requested: \$7,000,000.00

- *Relocate families out of high-risk areas.*

Infrastructure funds requested: \$48,500,000.00

- *Installation of drainage system - \$500,000.00*
- *Undergrounding electric and communication lines in the urban center and by the Malecon - \$6 Million*
- *Re-pavement of streets and sidewalks - \$10 Million*
- *Dredging, cleaning, design and reconstruction of walls in the port Paseo Las Americas - \$20 Million*
- *Improvements to the spa and recreation area Punta Guilarte de Arroyo - \$7 Million*
- *Bridge Construction in Sector San Felipe - \$5 Million*

Economic Development funds requested: \$19,000,000.00

- *New facilities for the Office of Emergency Management and Municipal Police - \$5 Million*
- *Construction of Ventana del Bucanero - \$6 Million Dollars*
- *Public transit “Tren del Sur” project - \$8 Million*

PRDOH Response: These projects and activities have informed PRDOH during the development of the Housing, Infrastructure, and Economic Recovery Programs. The Home Repair, Reconstruction or Relocation Program allows for voluntary relocation to eligible applicants. PRDOH understands the importance properly repairing the condition of public infrastructure and is committed to pursuing projects that will create long-term resilience to natural disasters and hazards. Through the Economic Recovery Programs outlined in the Action Plan, PRDOH is committed improving the economic landscape of the island by focusing efforts around post-storm economic recovery activities. Currently available information regarding these programs and program sectors is outlined in the Action Plan.

Comment: #388_10/18/2018_Municipio de Guaynabo

Summary: Guaynabo submitted a proposal which summarized the impact of Hurricane Maria and suggested activities to be funded under CDBG-DR. Arroyo suggests the following activities be funded under CDBG-DR funds. Total of 15 proposed projects Total: \$315,881,738.00 funding requested.

Housing:

- *Relocating residents from high risk zones*
- *Housing for the elderly*
- *Mixed Use Los Alamo Project*
- *The four winds assisted living and wellness complex*
- *Structures and homes suffering damage and needing rehabilitation*

Infrastructure:

- *Expansion of the Expreso Martin Nadal*
- *Construction of highway 834*
- *Connector for PR-199 to PR-177*
- *Connector in the Caparra Interchange in the area of San Patricio*
- *Highway construction, extension of Piedras Blancas*
- *Construction of La Muda Interchange*
- *Bridge reconstruction over Rio Guaynabo PR-836*
- *Electric Substation El Buen Pastor on PR-834*

- *Creation of a Mixed-Use Center of Operations on Avenida Cecilio Urbina*

Economic Recovery:

- *Mixed use project Los Alamo*
- *The four winds assisted living and wellness complex*
- *Development of commercial facilities*
- *Development of hotels for business use*
- *Development of Ecotouristic hotel in Parque Forestal la Marquesa*
- *Rehabilitation project to repurpose two structures formerly schools for business incubators*

PRDOH Response: These projects and activities have informed PRDOH during the development of the Housing, Infrastructure, and Economic Recovery Programs. The Home Repair, Reconstruction or Relocation Program allows for voluntary relocation to eligible applicants and prioritizes the elderly population. PRDOH understands the importance properly repairing the condition of public infrastructure and is committed to pursuing projects that will create long-term resilience to natural disasters and hazards. Through the Economic Recovery Programs outlined in the Action Plan, PRDOH is committed improving the economic landscape of the island by focusing efforts around post-storm economic recovery activities. Currently available information regarding these programs and program sectors is outlined in the Action Plan.



Public Meetings Transcripts | Introduction

With respect to recovering from a disaster, and truly in addressing the prior-existing needs across Puerto Rico that were expanded by the disaster, DV understood the need to engage communities to hear their input and learn about their community vision. As such, in the development of the Action Plan Amendment, DV sought to gather feedback in public meetings, aside from receiving comments via other traditional means (email, letter, etc.).

HUD, the federal agency providing the CDBG-DR funding, did not stipulate any requirement for DV to conduct public meetings. However, DV felt it was important to meet directly with community stakeholders, and as part of the public comment process, DV coordinated a series of 14 public meetings around the Island. Meetings were scheduled from 9am-1pm and 2pm-8pm, in order to afford all residents, stakeholders, business leaders, elected officials, etc. the opportunity to attend and provide input on the Action Plan Amendment.

What follows below are transcripts from the series of 14 public meetings, which are the spoken words of Puerto Rican community members and stakeholders who attended these meetings. DV is sincerely appreciative of the input, suggestions, comments, and constructive criticism offered by speakers at these meetings, and honors the courage and dedication of those speakers who offered their thoughts for the needs and future vision of their communities. Receiving feedback in this manner is of paramount importance to DV, not only to honor the process of civic engagement and inclusionary and participatory planning, but because DV understands that for CDBG-DR programs to realize their full potential of benefiting communities, the full spectrum of community needs must be understood through direct engagement.



Manatí

Comment #001_10-16-18_Ruben Rolan Do Solla

"I represent the LGBT community. I work in community-based organizations, and I'm going to read some things that I have written down. Young people do not have the possibility of affordable housing in safe places because we do not have decent work opportunities. Last year, in my community-based work with transgender and transsexual people, I have witnessed countless discrimination from the government; therefore, I request that this be an inclusive and visible project for LGTB communities. Homes for diverse families too.

It is important to preserve our cultural heritages, avoiding internal displacement and migration, expropriation of historically vulnerable, marginalized and excluded communities. Components of citizen and civil participation and that respond to human rights, and environmental responsibility must be integrated.

By this, I mean the importance of climate change in this type of proposal, to integrate a vision that addresses this as an urgent, imminent issue, and have as main objective to ensure our sustainability in the face of these climatic and geographical changes, based on the fact that we are in Manatí and the coastal areas are changing dramatically, and therefore, these funds should be used for that.

In the town of Manatí, especially in the urban area, properties are sold, of which I believe they cost over one hundred thousand dollars. It is to protect the virgin zones and the wooded lands, and to avoid the saturation of the earth with new constructions that continue contributing to climate change.

I mean that you are thinking of building new properties, new shopping centers, and that, having so many abandoned properties, not only in Manatí, but in Puerto Rico, the abandoned properties are countless... , we can continue counting. We already have too much concrete in this island to continue contributing to the industrial development, without having in conscience the ecologically damage that this causes. Thinking about the food sovereignty and projects and incentives of agroecological projects is fundamental for the stability of our communities and housing, and the same to the ecological contribution.

Developing hotels and shopping centers is for me the continuation of capitalist oppression over our communities. We do not inhabit this paradise to serve the foreigner, but to live in community in a healthy and safe way.

Before projecting these proposals thinking about the needs of people coming from the United States or abroad, consider our real needs and how we really want and deserve to live on this island. Building Puerto Rico is a historic challenge, we deal with the trauma of colonization and the bad administrations that have led us to impoverishment and the exploitation not only of our communities and human resources, but also of our lands. I want to live here, a safe space, with projects that are ecologically responsible and with gender perspectives to guarantee the safety, health and well-being of all those who live on the island."

PRDOH Response: PRDOH agrees that maximizing infill opportunities and protecting the natural resources of Puerto Rico. PRDOH is committed to serving vulnerable populations and program implementation will be conducted in a manner which will not cause discrimination on the basis of race, color, religion, sex, disability, familial status, sexual orientation or national origin.

Comment: #002_10-16-18_Glenda Serrano (Representative for the Mayor of the Municipality Of Florida)

"I represent the Honorable Mayor Jose Gerena Polanco, he had some prior commitments. He cannot be with us, because he just received a call. So, we are going to present the paper from the municipality. I am the current Director of the Office of Federal Programs. We are constantly working with these situations, with the need of the rehabilitation of people, and the needs they have today, before and after the hurricane, which were a little more complicated.

So, our motion is really because you... I don't know if you are aware of that, our municipality has very few limitations. Our... most of the funds that are directed towards improvements of structures, improvements in the municipality, what you see is done with CDBG funds. CDBG has had a variant transition in less than two years, and that has caused some delays in some things. We understand, obviously, that this is a part of it.

So, our biggest need right now is that, as all municipalities have said in the morning today, it is a big concern, which are the famous blue awnings. That's right, in the passage of the hurricane we have had the opportunity to see it up close. Many times, we ignore it and we can say "that is a humble house", but when one goes in, when this need is evident... Not only the walls, or the windows of the house were destroyed, but there are other greater needs for them, which is to be able to live properly.

Within our municipality, we worked together with the Corps of Engineers and FEMA, which also gave us a part of awnings, almost awnings, in such a small town, that is, we are talking about a fairly high percentage. Currently, we have a one %. Right now, we are identifying on the street all those people who have awnings, and the reason why they still have those awnings. What we have found out at the moment is that those people who have those awnings on their roofs is because they live in a property owned by someone else and they do not have theirs... that is, they were benefited by FEMA in terms of their furniture, but as for the roof, the structure, they do not have the possibility because, obviously, they are not the direct owner, so that the benefit is given to the owner.

There are also people in our town who live in an area that is flooded, a specific area that is almost always flooded, but in this case that floodplain expanded. That is to say, that these contexts, of what was contemplated before that became a flooded area, are now more encompassing. Obviously, these people who live in that place have to be evicted, that is, we have to make new constructions and see how we can evict them.

We are also confronted with the situation that the people who received the benefit of the rent "voucher" have already run out of time, the term, and have had to return to their homes, which

were not even finished, because what they received from FEMA was not enough, and that has been a cause for several appeals. We understand that, in this case, most of the Disaster Recovery CDBG funds must go to Housing. As we know the need, we understand that Vivienda is the entity of the government in charge, that we can identify the cases of greatest need, because we have the participants and the people who come daily, and obviously, if those people at some point should be evicted, we understand that the "vouchers" is a big need for rent, because we have cases where they have returned to their houses, and the houses are not in condition, and families try to help each other, but it is not enough, because it has been understood that the one who does not have five hundred pesos for blocks, does not have five hundred pesos for labor, right?

That's what they say out there.

So, it a very big need that we have. Let see what other aspect was important. Well, that is what I wanted you to consider. As long as you remember that our municipality, although it is small, we were blessed to have some people from a church, Mennonite, that helped us with approximately fifty roofs made by them in structure, and they gave them to people who they knew did not have property title, because that is another "issue", that the title of the property is very important in terms of this type of aid, and many of the people who do not have the help, have not received it for that important factor. That is what I wanted to talk about, those details that are affecting us, in order to raise the people and be able to live as we did before Maria, right?, or even better, we should have it even better. So, thanks for the time. So, I want you to think about that question.

So, remember the Municipality of Florida, because we made a presentation in March, but we understand that in the run they have focused on what is most necessary, which is to have people with safe homes."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. Programs in the Action Plan are not geographically restricted; residents of Florida may be eligible to receive assistance.

PRDOH will use traditional and non-traditional methods for verifying home ownership.

Comment: #003_10-16-18 _Nilsa Lopez (Pre-Vocational Institute of Arecibo)

"Good afternoon, Housing staff and others present here, and thanks for making this accessible, that we can depose and expose our points of view. I represent an entity for years which I founded in Arecibo, and we are working with the most vulnerable people. We have programs such as housing and credit counseling, we have incubator projects, we have centers for elderly victims of crime, we have late payment of rent, to avoid wandering, we have disaster case management with FEMA, and we are with VALOR program giving zinc, wood, doors and windows to those who need it.

And it brings to my attention when I was reading the guides, that on the page, in the paragraph, last paragraph of that page, it reads that the maximum award for a single counseling entity...

with much respect, I understand that it can be a spelling mistake or it could be a mistake... honestly, we want it to be clarified, because we want to be part of this recovery, and we are doing this recovery, and even more. I was born in Utuado, and I'm proud of it. I tell the people, if I do "bu" it is because I am from Utuado, near the Indigenous Park, but I live in Arecibo, and we are impacting Utuado with disaster management, and it is nothing of what is said to be there.

Every time we go to the elderly or to the houses, they are affected, physically, humanely, really, they are devastated, and we want to be part of this counseling, we do not want them to lose homes, there are a thousand ways for them to maintain the homes and that is our goal. In our opinion, this document is either badly written, with due respect, or is wrong in this paragraph, or it would not be competitive, why? Because we are certified by HUD, in addition to programs like Unidos US, in the United States, and HUD has the counseling by areas, and so it gives us the certifications.

We are an entity ... towns like Utuado are devastated, because we are the only ones in that area that gives that certification. Therefore, it is a mere fact that it is poorly written, or otherwise, we ask for a rectification thereof. OK. We provide all services for free. We do not charge for services. If something is charged, it is to maintain under proposal, nothing more.

So again, and I tell you, it's been years that we've been in this need. And we do not want this to impact the most vulnerable population. I ask you to rectify this, and that we can be a part of it. And I congratulate the mayor, because if I had a plan like him, it would be tremendous, I am sure that every citizen of Arecibo is envying Manatí with that mayor, honestly, with due respect, but we are envious, he has a tremendous planning, so I let him know.

So, we state all this with great humility, and waiting for you to rectify this and we all be part of this recovery, which is our commitment. I'll leave you with my colleague, Rosa Abreu, from the finance area, who maybe wants to say something to you."

PRDOH Response: HUD-Certified counseling agencies are eligible applicants for the Housing Counseling program. Information regarding how to apply will be published at www.cdbg-dr.pr.gov, as part of program guidelines when available.

Comment: #004_10-16-18_Rosa Abreu (Pre-Vocational Institute of Arecibo)

"I want to say that we are a HUD-certified agency to offer housing counseling services, and we are on this page, and we already expressed our concern about that, and we want the agencies that are certified, which are only seven in Puerto Rico, okay, there are only seven of us, we want to be part of the recovery of Puerto Rico, because our citizens need this service, and as we said, the northern, north central areas are the most impacted and vulnerable areas, and we want people to receive counseling in housing, homeless people, for rent, and about "loss mitigation", about economic development, but there are many people who have lost their jobs and have situations... of execution. OK. So, we request that it be reviewed and taken into consideration that we are seven agencies in Puerto Rico and we are in the north area, which is Arecibo, and we impact all the towns in this area."

PRDOH Response: HUD-Certified counseling agencies are eligible applicants for the Housing Counseling program. Information regarding how to apply will be published at www.cdbg-dr.pr.gov, as part of program guidelines when available.

Comment: #005_10-16-18_Kelvindranath Perez Gutierrez (Advisor to the Representative of Abid Quiñones)

"We have a copy of the reports, if possible, in the first instance, we establish that as is public knowledge, the municipalities of Utuado and Adjuntas suffered damages that, according to reports, are around 40 million dollars, especially with regards to public roads.

This information was provided by the municipalities themselves, in particular the Municipality of Adjuntas and the Municipality of Utuado. For this reason, we expose some particular routes that suffered the most damage, according to the information provided, of the "assessment", on the evaluation that was carried out by these municipalities, which were in the "Floor". They were there in their municipalities and could examine them.

In particular, the road, as we described very well, has the peculiarity that is used by heavy trucks, and what this causes is that in the face of deterioration, companies such as Baxter and AVI have to find alternate routes, and this is affecting the community, because these alternate routes are not designed either in dimensions, or in resistance for the weight of these trucks, but in turn the disjunctive is given, the fact that we need these trucks to reach their destination, because it implies operational costs for these pharmaceutical companies that generate employment in the district.

So, the PR, this is a priority, since it impacts two hundred thousand inhabitants. This is a long road and for many years this was being seen... it was deteriorated, and with the impact of Hurricane Maria, the situation worsened, of course, and this causes that these two hundred thousand inhabitants are directly impacted since they have to look for alternate routes and these alternate routes in turn provoke an economic impact because the small merchants that benefit from the highway lose that economic activity because the residents have to look for alternate routes, and the vehicular flow changes. In the short time we have, apart from what is the road infrastructure, which we understand is of the utmost importance, what interests us, above all, is that the PR can be finished, that apart from having suffered the damage as a result of the impact of Hurricane Maria, the completion of this section would imply an economic incentive for the entire district, in particular for Utuado, and in turn, incidentally benefits the municipality of Ponce, due to the vehicular flow through this mountainous area, something that would be achieved if the PR is completed.

With regard to housing, the impact actually occurred in the mountain district, and because of the profile of this type of community, what we are requesting is an empirical study to determine the need, but that this housing construction should be in harmony with the "per capita" income of that particular district; that is, homes that are accessible to that type of socioeconomic profile that the mountain district has."

PRDOH Response: Infrastructure projects may be eligible under the FEMA Coordination, Critical Infrastructure Resilience, or City Revitalization programs. The Home Repair,

Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.



TOA BAJA

Comment: #006_10-16-18_Nayda Bobonis (Community Leader And Resident Of Buena Vista, Hato Rey)

“Community leader and resident of Buena Vista, Hato Rey. One of the eight communities near Caño Martín Peña. I am standing before you on behalf of that body and the residents who are there. We appreciate the opportunity to express our concern regarding the need for the Puerto Rico action plan be truly consistent with the public policy of fully seeking citizen participation in this recovery process one year after Hurricane Maria. The G-8 communities have one of the highest population densities in the country. And the need for decent housing and adequate infrastructure remains latent.

After the passage of hurricane Maria and despite all the efforts made, we still have many residents without adequate housing. Many affected residents were unfortunately not eligible for FEMA individual assistance. This means that every time it rains our streets continue to flood, the houses continue to be affected and our residents get sick.

We have been dredging the channel for decades to avoid this type of flooding. So, we can retake a better quality of life that we lost a long time ago. Our communities are organized. The fact that we have a strong organization has allowed the G8 to respond to the needs of their residents. Through collaboration with the project, with the Enlace project corporation, as well as the Land Trust, the non-profit organization ensures collective tenure. But this is not enough to advance our goal and that is why we return here today.

We consider that it is fundamental to examine a possible flexibilization of the action plan for Puerto Rico, taking into account the reality of the country and of our communities. The possible implementation of the plan in the way it was conceived could concretely involve the massive movement of our neighbors. Only in our area there are one thousand two hundred houses that were affected after the hurricane. Of those houses, there are many that have not yet been fixed due to the lack of accessibility of funds. In fact, this refers to people who still do not live in decent conditions more than a year after the hurricane. And that before the options sought through this plan are seen in the urgency of moving from homes, spaces they have considered their home for a long time, even for generations.

To avoid this type of approach, it is essential that the residents and the community as a group become involved in making decisions that are for the common welfare. The Caño communities have a comprehensive development plan created by the residents and executed through the public policy developed by the Enlace project corporation a few years ago. The restrictions imposed in the action plan make it impossible to complete it. Limiting construction in flood areas in the manner proposed does not necessarily take into account other ways to handle this concern.

In particular, this can cause a considerable displacement of our residents. With this plan, the resident has no right to choose, but he is pressured to have to move because he cannot rebuild his house in the place that has been his home. And they are complex decisions. But this led many

Puerto Ricans to move out of the country and, therefore, we consider it very important not to overlook all the needs of the individual, both in the economic aspect, but also in the social aspect.

In our case, we request that the public policy developed through the integral development plan of the dredging project be respected, as well as Law 489. In our communities there is work already done. And this translates into millionaire investments. We need that this plan be continued and that we have access to the CDBG-DR funds to complete the infrastructure works in it. This would imply an investment for the improvement of the lives of thousands of residents. This would have economic implications and would have positive ecological implications. Not only will it be beneficial for the twenty-five thousand residents, but also for the rest of the country. And the most important thing is that we are ready, we are only waiting to see the support promised by the current government administration, both at the state and municipal level, and also from the private sector members, supporting all the initiatives of the Enlace Caño Martín Peña project in conjunction with the G-8 leadership that I represent today.

Wasting this opportunity and not counting on the CDBG funds in the execution of our plan would be wasting our effort, as well as the hope of having achieved the integral development plan. When it is put into real perspective, that is how it affects us. Over the years we have given ourselves the task of making clear the imperative need for this plan to be carried out. What our community has already done a while ago. These funds are an incomparable opportunity for social justice to finally reach us. In my family, I am the third generation who, as well as the rest of the residents of the communities, have the hope of seeing the dredging already done. Please, let's take this opportunity.”

PRDOH Response: PRDOH agrees that recovery works best when it is community driven and has designed programs such as the Whole Community Resilience Planning with those considerations in mind. PRDOH values input and participation from impacted residents throughout the life of the grant. All relocation options included in the Action Plan are voluntary.

Comment: #007_10-16-18_Sra. María Hernández (President of the Board of Trustees of the Land Trust of Caño Martín Peña in San Juan)

“I stand in my capacity as president of the Board of Trustees of Land Trust of Caño Martín Peña in San Juan. The Land Trust is a private non-profit organization, created in perpetuity and it is created by provision of Law 489 of 2004, as amended. This organization collaborates with the G-8, the Group of the Eight Communities Surrounding Caño Martín Peña and the Corporation of ENLACE Project of the Martín Peña Canal to achieve the re-development of the Special Planning District of Caño Martín Peña, as planned with the active and informed participation of the communities in the district.

This project aims to allow the environmental recovery of Caño Martín Peña, which is an important body of water not only for the communities of Caño but for all of Puerto Rico. And at the same time, it serves the rehabilitation on site of seven communities that have been living in this land for more than one hundred years, as it is the case of some of them. It seeks to overcome the

conditions of marginalization and vulnerability without this entailing the displacement and rupture of the social structure and support networks created over so many years.

This objective of the Land Trust is in harmony with the established public policy of preventing the involuntary displacement of those residing in the heart of San Juan. This Land Trust was awarded the World Habitat Award 2015-2016, for our vision of housing as a human right and its inclusive nature in view of very low income people and women as heads of the family. It is the instrument designed from the seven communities that comprise the District for the making of its development plan and at the same time, and among other purposes to ensure the provision of affordable housing in perpetuity, in the very long term. Avoid involuntary displacement and gentrification of our communities and regularize land tenure for those who do not have property titles.

This allows that the more than 15,000 residents and 300 businesses of the District benefit from improvements in infrastructure, housing and dredging of the Caño Martín Peña. These works will significantly reduce the risk of flooding with used and contaminated water that affects thousands of people and floods homes. The property of the Land Trust consists of more than 200 acres of land. The vast majority of them in the place where the residences of its members are located. However, part of the corpus of the Trust is also comprised by vacant land suitable for the development that benefits the communities of the District and, therefore, the city.

The members of the trust are the works conducive to the improvement of the quality of life of these communities of very low and low incomes. It is also important to note that while the model proposed in the revised Plan provides for a period of affordability of housing for a defined term of ten or fifteen years. The land trust allows housing developed using subsidy to remain affordable, in perpetuity, maximizing the benefit of the money received, which are funds that are not recurrent.

This is achieved by maintaining the “[unintelligible]” of the house and the land, using the first refusal and pre-emptive rights and limiting the profit that could be derived in case of resale by the owner. Giving consideration to this new model to maintain affordable housing is consistent with the revised Plan's approach, which is reflective, coordinated and seeks the transformational recovery for our Island, generating social capital by rebuilding families and communities. The Trust is the ideal entity to channel federal funds and housing development in the Caño Martín Peña Special Planning District, not only to achieve decent housing at affordable prices, but also to ensure that such housing can remain affordable in perpetuity. We will be submitting more comments.”

PRDOH Response: Thank you for the thoughtful comments and innovative suggestions regarding affordability periods. PRDOH has taken these suggestions into consideration.

Comment: #008_10-16-18_Sandra Santiago

“Thank you for the opportunity to express the needs of our community. And I, particularly, bring the needs of a family. My name is Mrs. Sandra Santiago Rabat and I come as a volunteer from the streets, specifically that of Urb. Lagos de Plata, here in Toa Baja. And also, as a member of the Holy Trinity Parish of Levittown. Before speaking about the family in particular, I want to show

you the whole process until we reached this family, which after one year of the Hurricane Maria is still followed up.

When the floods happened, the next day my husband Juan Marrero and I took on the task of going street by street in this area that corresponds to me. And we were seeing the needs, giving and giving the most, giving motivation that first day to continue forward. Let's move forward. That we were together helping us. And so, it has been. After this, the parish gathered us and asked us to volunteer to help. On this day on which we were seeing the streets one by one, this particular family caught my attention. There was another, there were many, although the flood did not cover all the houses. But most of them were covered. We saw families taking out all things. Some of them were worried, some happy, because they were alive and so we continued.

After this, as the parish invited volunteers, we went and the leaders, Lydia Negrón from Caritas de Puerto Rico organization and Omayra Acevedo from the organization to attend the emergencies of our community in the parish. They guided us on how to do. We evaluated the community, we went and made the census, street by street. We found several families in need, who did not have what we call support from external families, as a lady here said earlier. It is a community where there are many elderly people and people who have little family support. So, this family, the Serrano-Juarbe family, was one of those that worried us.

In those days, we brought them warm meals from the parish. There was an organization that was dedicated to preparing meals. And we gave meals based on the census we made. Those families who we saw that were in need. Other families could manage to have access to food. We want to thank the mayor and his leaders, who gave us meals for families in emergency. So, we continue solving the most important things. But, in this particular case of this Serrano-Juarbe family, the first thing we did was to clean their house with the help of some neighbors and the parish, the members of the parish that could help.

They are a family of a low socioeconomic level and with three elderly people. The first thing we did to help this family was to clean up. With their authorization, because they are elderly people, who find it difficult to get rid of their things. So, we were asking them little by little, "we can throw this away, yes?" Well, we threw many things out and so on. Something very, very difficult that we saw in the cleaning is that there is waste water coming out their garage through a pipe. This worried us greatly. We did that cleaning. We got help from the group and the parish and we also got two beds with a lady named Mrs. Pilar, from AARP. We got bedding, clothes and food for them. But until now, we are following up and I'm going to start telling you why...

The most critical thing is the cracks in the house. When it rains a lot, the water leaks into the house. So, they have many cracks in the house, and what I would ask is to help this family with this, that way you'd be helping us."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. The family referenced may be eligible to receive assistance.

Comment: #009_10-16-18_José R. Rondón Dieppa: (President of the Special Community of Bo. Camarones in Guaynabo)

“There we have high hopes that in these hearings you give the go-ahead to most of these urgent needs that we have, mainly those that I list below. The most urgent... I have many years longing for my neighborhood of Camarones and the rest of the neighborhoods of Camarones in Guaynabo have a sanitary sewer. Even when we have made efforts, the sewer system has never been built, because they are costly projects. But we hope that, with these funds allocated by the federal government, CDBG-DR, we could finally be aided with this urgent need.

Our houses, which are more than a thousand homes, begin near Sears, where there is a statue of the former senator and judge of the Court of Caguas, Mr. Urbina, I don’t know if you have seen it. The Camarones neighborhood of Guaynabo begins right there and extends up to the road number... the well-known La Muda. The Guaynabo River starts parallel to that road, and, as you may know, the houses have septic tanks. And these waste waters go directly towards the river, since there are many people who have illegally connected to that river and they throw their waste waters after being used in the sinks, etc., to the stream, La Pagana. They have what we traditionally call a tank of waste water and they throw them, and they go to the Guaynabo River.

Eventually, this caused that fishing activities cannot be performed in these waters anymore. Because these waters are polluted. It is more urgent than ever that every owner has land titles. There are very few people, there are more than seven hundred, almost a thousand families that own their land. Many of the people who applied for FEMA benefits were denied due to lack of ownership. They should demonstrate FEMA that they own these homes, even though many of these families have been living there for fifty, eighty, seventy years. Through these funds, many families can be aided by making a body of lawyers visit these places and help them. And those who can pay for that ownership, then shall pay for it, but the immense majority cannot afford the legal expenses for this urgent need.

Another of our needs is to build a space for recreation for our community, such as a multi-purpose indoor court, which can be used for basketball, theater, community meetings, to serve as a support center or shelter in case of natural disasters. Clinics could be held there too. Another urgent need is the bad condition of the bridge on the Guaynabo River which for years has given access to the community of Camarones Centro, which is neighbor to us. That bridge no longer meets the necessary security conditions and was greatly affected by Maria. And this has caused that the families on the upper portion of the bridge have lost their properties and were affected by waste waters of the septic tanks there. This is why I came here before you and make you aware of these needs that I have respectfully exposed to you.”

PRDOH Response: Thank you. Infrastructure projects may be eligible for assistance under the FEMA Coordination, Critical Infrastructure Resilience, or City Revitalization program. As outlined in the Action Plan, PRDOH will use traditional and non-traditional methods for proving ownership. In addition, the Title Clearance program aims to provide homeowners with clear titles to property.

Comment #010_10-16-2018_Sra. Angela Caballero

“My house is made of wood and cement. And FEMA gave me a little money, but I wanted to rebuild it with blocks, and the money is not enough for the things that were damaged and everything in the house. That's why I'm here to see if you can help me. I am from San Jose, and I also ask you to help that community, because there are many houses that are still not fixed.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #11_10-16-18_Carmen Villanueva

“I came to accompany her because she did not dare. That is part of the process of reaching the community itself. I corroborate what she has said, about the process that FEMA did with the community. And you have to look at them one by one because each one has its own needs. So, I corroborate what she has said. I just met her and that is the best claim of many people in our communities.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #012_10-16-18_Mari V. Romano Bosque (Angeles de Cristo of Toa Baja)

“I live in Villa Esperanza, special community in Bo. Campanillas in Toa Baja. My foundation is called Angeles de Cristo. It has been founded and incorporated five months ago with all the requirements of the Commonwealth of Puerto Rico. But I have been working in non-profit organizations for two and a half years. My concern for this presentation is the condition of the structures right now after Hurricane Maria. Many of them have not been repaired yet. We have people sleeping with canopies who are still getting wet in Campanillas. We have many abandoned and empty houses. The recreational, sports facilities are destroyed. They are irreparable, they have no light. You have to find a way to repair them. We ask the foundations or entities that can contribute, whether from the federal or state government, to provide us with the help. That the municipality gives us the support and the non-profit entities provides us with the resources and repairs the roofs.

Look, I feel very sad by saying that there are communal centers that have vandalized after the hurricane. The courts were vandalized. The gates do not have lights. And there are still people

with disabilities who have not been able to return to their homes. Children who have not yet been able to return home after the flood because FEMA has not yet paid for it and they do not have the resources to return to their homes because they lost their car, lost everything. If the municipality does not provide them with resources to repair their homes, then they do not have the way to return. They are still living with relatives. That is, it is a help that is urgently needed.

That is, this is an urgent call to our communities, that there are many abandoned and empty houses. And we need help, the municipality needs help. They need the contribution, so we can all work together in the same goal and can repair everything and fix all these roads which are also destroyed, solar foci that can be installed, such as solar panels and other energy. We still have many poles that are damaged. Many poles that are fallen, that could not be replaced. In the slope of the Guano, there is a pole that scares me every time I see at it. If the rains continue, that pole can collapse. And there are still many things that need a lot of help in our town and in our communities in general.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Infrastructure projects may be eligible for assistance under the FEMA Coordination, Critical Infrastructure Resilience, or City Revitalization program.

Thank you for your comments. Understanding needs of the communities informed PRDOH during design of programs outlined in the Action Plan.

Comment: #013_10-16-18_Deborah Rivera Rosa (Fundación Promesa de Fresco)

“My name is Deborah Rivera Rosa, professor of Puerto Rico history at Adolfina Irizarry de Puig School. Struggling for thirty-eight years in these conflicts. I am a teacher at Adolfina Irizarry de Puig, the high school of our town. I am here at this moment because I am sick, but at the request of some neighbors of the town, they made me bring the news. And I come to explain the situation of some students who are still sheltered with grandparents or uncles/aunts because the storm destroyed their houses and they have not had the chance to rebuild them again. I did not know the criteria for the presentation in advance, so I did not bring it on paper. They told me that I can submit it online, so I will do it with the cases specifically explained. Another issue that I want to address is the fact that the parks are becoming nests of delinquents due to lack of lighting and maintenance to keep the areas clean. Specifically, I brought one case to the attention of the municipality, to the individual who is representing it, Mrs. Canales in Levittown, in Paseo Centurion Final, because the training there at night consists on hiding in the dark. I do not know if they are fake or real shots to play, by those who are in that environment. It is of great concern for us, specifically for me, that these children can once again walk on a firm emotional footing, with a safe place where they can live. I thank you for coming to our town. And I hope we can contribute and help you to identify these issues and that our guys can benefit from your help.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Infrastructure projects may be eligible for assistance under the FEMA Coordination, Critical Infrastructure Resilience, or City Revitalization program.

Thank you for your comments. Understanding needs of the communities informed PRDOH during design of programs outlined in the Action Plan. PRDOH agrees that the welfare of our Puerto Rico's children is of the utmost importance.

Comment: #014_10-16-18_Grisel Bermudez Garcia (Municipal Legislator of Toa Baja)

"I live in Bo. Pajaros of Toa Baja. And I work as a Municipal Legislator and I am a retired teacher. I apologize, for not bringing the presentation in writing. They told me that I can submit it online, since I did not know about it. We all know that the infrastructure in Puerto Rico has suffered great damage. My concern is what are we going to do with the permission of the people who have to rebuild their homes. Because they are facing the situation that they have to rebuild their homes. And at the moment they ask me that they have to bring a plan from an engineer, pay some taxes, some contributions. And who is going to make those plans for me? If the money that I have is the one that the government gave me as help for my economic condition. I know many people who were given money to rebuild their ceilings in wood and among their children they collected money to make it with cement, but they are asked a plan of an engineer that has a higher cost. Where will I get the engineer?"

I do not have knowledge about it, but I understand that if I make a wooden house with a proper anchorage, and the suitable construction specifications with suitable windows, that house can be resistant to hurricanes. But how I, a poor individual, can pay an engineer to tell me what the specifications are so that they can then give me a permit for reconstruction? That is the concern that I bring you this afternoon, because in terms of infrastructure and damage, everything is said. That is my biggest concern. Thank you for the opportunity you give me to bring it to your attention and thank you for taking into consideration this beautiful municipality, always at your service."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct code-compliant homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. All homes assisted by the program will be properly designed and permitted.

Comment: #015_10-16-18_Eliot Ramirez (Corami, Inc)

“As the gentleman said, I represent Corami, Inc. Corami is a corporation that was initially created to develop a particular project. That is known as Ponce de Leon Mil. You surely know this building, that is on the corner of Ponce de Leon and La Gandara in Rio Piedras. Those who studied at the university or studied in this building that is on the corner in front of the buildings of La Torre. This is what remains right now. This is the condition of the building. It's a building that Corami acquired about eight years ago. And we have tried to rebuild it on different occasions.

Well, we are here before you to present our idea, so you can take it into consideration. This is the status of the building. Before I start to quickly explain the building conditions, I want to point out that this is the entrance to Rio Piedras. The traffic of Río Piedras will be changed, because it was "two way" before, in two directions in that traffic light of Ponce de Leon. And they changed it in such a way, when the urban train was constructed, that you can only go out by it. And part of our proposal to the future is that it becomes a two-way avenue again, because that is the heart of Rio Piedras. We want this to be part of the development that I will show you now, of what is going to be the door of Rio Piedras. This is a larger project, which is a "boulevard" of development, which includes a lot of initiatives from different people. But that is attractive because it is just at the entrance to the town. And that town is a bit congested.

It has been developed in some areas, but other areas still require development. What you see here is what we want to do. We started to develop this project, as I said, eight years ago, maybe seven. And we take it to almost all instances. The thing is that permits, as everyone knows, are complicated in Puerto Rico. It took us about five years until we obtained it. When we obtained the permit, the market conditions had changed. The tax credits had disappeared. Everything was a "mix". But we never lost faith. We always saw it as an opportunity, as we said at the beginning, to develop Rio Piedras in all its instances. And, basically, we will focus on housing.

Let's start there. It is important to mention it, because we understand that there is an imperative need for housing. On some other occasions in the past we have met in order to try to develop something much bigger, but then it was impossible to move on. But the project that you see here, was still developed. Almost all stages have been developed. It does not have the technical plans, but it has construction plans. It has all the permits. We already obtained some pending permits, which cannot be cancelled or revoked; they are in force. It has its corresponding permits. Obviously, there are missing parts of the project that are closely linked to the development thereof, as the technical plans. We still have to obtain them, but they are obviously of a high cost, and we should have a certain degree of security to be able to develop them.

The project will be implemented. We still have to discuss other subjects like, for example, the approval of the urban train that was critical at that time and nowadays, because it has very particular regulations. If an urban train station is built a hundred meters from the building, then a "parking" cannot be constructed. And then, there are too many things that are required, and we have the approval of the urban train. In other words, almost all the agencies have practically given their approval. We do not have the permit and the bail neither of aqueducts nor sewerage, and electric power, because one thing comes hand in hand with the other. And to get the bail, it is required to prepare all the technical plans, submit them, and so on. But the project is well complete.

When this CDBG initiative came up, we talked to other people we know, people who have been linked and they said "look, maybe there is an opportunity". First, because it is housing. They are rebuilding a property that is deteriorating. And maybe there is an opportunity for me and that is why we come to you. The document that I am going to give you as part of the record is quite complete. It has an explanation. It has a first part that is an explanation of why the project and what are, in our opinion, its advantages, the things that are positive for the city. It also has some historical data. It explains what the building is, the size, the floors, the things it has. That building, to my surprise, was constructed in... I got a picture and I said, "it cannot be possible". And it has not fallen, it's amazing. I mean, it was not what this is. What exists is a good part of that time.

For many years, this building had a McDonald's. I do not know if you remember that. In front of it, there was a Kentucky, and there was a McDonald's for many years in the area of Rio Piedras. I apologize that this presentation has lasted so long. Well, the document that I give you, in addition to the technical explanation, has the plans "as built" of the structures that are already constructed at the moment. It has the suggested plans for the future, the permits, and after the permits it has the estimated costs. The estimated costs endorsed by established companies and a summary of the estimated costs of the project. And there are other additional documents that are municipal payments and a series of things to try to deliver as complete as possible. So you tell me, I 'm giving it to you. And I 'll give you this material, or maybe not, because this is not necessary. I can give them to you, I have no problem. I'll leave them here. That's it. Then, I can eventually send them digitally to the website or wherever you require it, so you have it available."

PRDOH Response: Opportunities for housing assistance are outlined in the Action Plan. The CDBG-DR Gap to Low Income Housing Tax Credit and Multi-Family Rehabilitation, Reconstruction, and Resilience programs offer funding for the creation or rehabilitation of multi-family housing projects.

Comment: #016_10-16-18_Alan Rivera Ruiz (Green Energy Association of the seventh section of Levittown).

"As I told you, last Friday afternoon we received the record for the first time. And we are analyzing it very carefully to be able to give our comments responsibly. My name is Alan M. Rivera Ruiz, I live in the Genaro Arizmendi HR-4, 00949. This is in the seventh section of Levittown. I have been living and I consider myself part of the capital of Toa Baja, Levittown for twenty-two (22) years. So apart from this fact, I preside over the Puerto Rican Green Energy Association, a non-profit organization. Engaged to education on the subject and we promote everything that has to do with resilience, with the renewal of health, safety, energy matters and citizen participation in the democratic processes of the country. With this information, I begin my initial comments on CDGB-DR 2018.

Reading the document we see the need for collaboration to be active within the administrative processes that are limited to these projects. And let me explain. Apart from being president of the Puerto Rican Green Energy Association I am part of the board of directors of a newly founded savings and credit cooperative. It has been recently founded. We are capitalizing at this time. And our cooperative goes in the approach of working projects that give our partners-owners

everything that has to do with energy, aqueduct, agriculture. Giving them the necessary foundations so that they have an efficiency in their businesses and in their home, specifically in their home. Those people who want to buy an eight-cylinder car can go anywhere, can go to Banco Popular, can go anywhere; but if they want to work efficiency as we are considering it; then, they would have to come and ask for a loan to improve their homes, to harvest, to improve their homes for a renewable energy system. And if they want a car, then it would have to be a hybrid or an electric car, what they would have to propose to us. That type of instance, this type of parameters is what moves us.

And due to these parameters, we want to make the comments that we are going to make in the afternoon, which will be as short as possible, since, as I said, we will prepare the proposal electronically. We see the public as shareholders in a program. And I limit myself to the experience we already had in what was called the weatherization assistance program of the federal government. That here in Puerto Rico was used in the past, in 2014-2015. In which there were houses which efficiency had to be managed, where there were too many abusive energy deployments, because this federal program is from the 40's, and it was implemented in Puerto Rico at the behest of many groups that insist the federal government that Puerto Rico was a good land for these funds. Sixty-seven million dollars were given at the time that specific housing arrangements were made. First, it gave work to a series of people who had to be recruited and prepared to be energy sensors in the homes.

In short, the way to administer CDBG funds has parameters already established in other programs that have been established in Puerto Rico. The cooperative boards would be a very important element to establish them within these programs so that the communities are in harmony, the request and the demand, with the available funds. What kind of work we can help to carry out. Right now, along with architect Fernando Abuña, we prepare some plans which are completely available, free for the people of Puerto Rico. And for those who have to rebuild their homes under this program, we would like to see how we can join the program and that these plans are available as we would attend housing in Toa Baja with multifamily housing, with electricity, water, toilet, all included inside the property with an amount in the budget between what is labor and materials if the family or the individual owns the land. And we would have a house like the one Dr. Fernando Abuña has in Breñas. It has water, electricity, a toilet, but it does not have any of these bills. We call it the absent house. We have replicated this model in a plan, that is now available and which details will be explained in the presentation.”

PRDOH Response: PRDOH agrees that sustainable, renewable energy and community participation are essential to the recovery of Puerto Rico. PRDOH values collaboration with communities and looks forward to a continued positive relationship with them throughout the life of the grant. The Community Energy and Water Resilience Installations program offers sustainable, renewable energy and water installations to eligible residences and small businesses.

Comment: #017_10-16-18_Mari Cortes (Community leader of Villa Calma)

"I am the community leader of Villa Calma here in Toa Baja. The problem we have is the channeling of the La Plata River, which is the most urgent thing for us, since every time there are hurricane events it affects us. We are not flooded by rains. Here, it can rain the whole year and we have no problems with the sewage system. The problem originates every time the dam is open. On that occasion, my community was flooded fifteen feet high, and the ground and second floors of the houses were completely covered with water.

We need infrastructure improvements since this community does not have property title and, therefore, the FEMA department rejected many cases. We need a lighting which can be solar, since the lighting on the roads is not working. As I said, the ownership is very important because many residents do not want to depend on the help of FEMA. They want to have a property title to apply for private insurance. The companies we have asked told us that without property title the insurance cannot be paid, because we have no evidence that the property is ours.

And another thing we ask is the participation of community leaders in all these processes. I say this because I know many people from the community who do not reside in Puerto Rico. They are out of Puerto Rico and they were the first to receive help. They received help from both the FEMA and Tu Hogar Renace. At the time these agencies call them and tell them "let's go and check your home", the individual buys a ticket and in that same week he/she is in Puerto Rico. They received help from FEMA, then from Tu Hogar Renace, and those houses were roofed. And I know people who live in the community and then they have blue roofs. That at least all these aids are coordinated hand in hand with the community leaders who are the ones who know who lives and who does not live there. To avoid this. If help to repair homes will be provided, repair those of the people who are currently living there, not those houses which are empty. Because these people are the first who come and request."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Infrastructure projects may be eligible for assistance under the FEMA Coordination, Critical Infrastructure Resilience, or City Revitalization program.

As outlined in the Action Plan, PRDOH will use traditional and non-traditional methods for proving ownership. In addition, the Title Clearance program aims to provide homeowners with clear titles to property.

Comment: #018_10-16-18_Michelle Rodriguez (Executive Director of children)

"I am the Executive Director of Niños, Nueva Esperanza. That is a non-profit organization located here in Toa Baja, in Sabana Seca, specifically. We have been working for around 20 years for the community. One of the main things that we try to work in the community is precisely the social deterioration, to counteract that social deterioration. One of the main goals of the programs we are leading is mainly that of cultural deprivation. We are attacking this problem.

I know that perhaps the funds are now more directed to what is economic development, infrastructure development, etc., And, I do not say that it is less important, on the contrary, we notice that it is important and necessary. However, for this development to be effective, we also have to consider under proposal the condition of the service to the public, the human resource, which we want to be stable and healthy. So, my presentation comes from this point.

We know the social deterioration of the community, it is not only because we are in a community with an evident level of poverty, with limited resources. Where schools close, people have to move to other places, lose homes, lose jobs. Some people recover things but not completely. Our community is basically composed of women heads of family, single mothers; and this worsen the panorama. And if we consider statistics, they say that when that happens the social deterioration is worse, because there is less income and higher criminal incidence. What it is known as school desertion. That adds up to mental health problems, which also still represent a burden on the government eventually. And we are precisely working with four programmatic areas to strengthen the community in those areas, including tutoring, the academic part. The development of psychosocial arts and services.

After the devastation caused by Maria, we worked with a program that we called Empowering Sabana Seca. Everything that we achieved by impacting on five hundred families of the community, just a few non-repeated individuals, around two thousand five hundred people. And the program includes four program areas. One of them was to census. We were the first to have a census, about three hundred people counted prior to the municipality decided to census in the streets. All this was achieved through alliances, with volunteers and with funds at the private level. So that was one of the first steps.

The second thing included matching the needs identified in the community with resources and alliances that we could achieve, and this was also done. The help was not only to provide water or food, but we also moved to help visiting residences, bringing nurses, doctors, psychologists. We are still doing it at the residential level because we have a high population of the elderly or single people. And also receiving participants in our center. We had around five health clinics with a diversity of services. All this on a voluntary level. Or through proposals we got for the project.

Also, in the third stage that included the cleaning or removal of debris, trying to relieve some of the burden on the community. And, ending with educational programs to prepare not only members of the community but also to develop community leaders. All this is part of strengthening and building a healthy community. Not merely the infrastructure part. And I must point out that right now we are in the process of completing the roofs of our second and third houses. These were programs that were not initially ours because our goal was not that, but we adapted it to that reality. With the best intention to rebuild our community in the best way we can. So, my request would be that, at the time of distributing funds like these, you may consider contributing to community programs that have these goals. That the community does not develop only around infrastructure and economic development per se, but also in the part of personal support and development. So that's practically what I wanted to express tonight."

PRDOH Response: PRDOH agrees that personal support and development are important and has taken these comments into consideration. The Housing Counseling program aims to provide wrap-around educational and support services to impacted residents.



BARRANQUITAS

Comment: #019_10-16-18_Jesús Colón Berlingeri: (Mayor of Orocovis)

"I appreciate the invitation of the Department of Housing of Puerto Rico to appear before you and say my opinion about the first amendment to the Disaster Recovery Action Plan, CDBG-DR Funds, published by the Department of Housing on September 21, 2018. And, I reiterate, the intention of the Orocovis municipality to participate in the programs offered by the CDBG-DR funds.

The municipality of Orocovis was one of the most affected by Hurricane Maria. Forty-four percent of our homes suffered considerable damage. Ninety-four percent of municipal roads were affected. It is estimated that the general damage in our municipality is approximately eight hundred million, of which two hundred million belong to infrastructure damage. Seven hundred and forty-two structures were affected. Six hundred and seventy-one incidents on municipal roads, seventy-one facilities distributed in recreational areas, public buildings, facilities, and Head Start facilities. The municipality of Orocovis has a population of twenty-three thousand four hundred twenty-three inhabitants according to the federal census, approximately. Fifty-seven percent of our population is of low income. This percent has undoubtedly increased because of the effects of Hurricane Maria. Also, the elderly population and people with disabilities have been seriously affected.

With the CDBG-DR fund program, we aim to satisfy the needs of our disadvantaged communities, eliminating and preventing any vulnerability to atmospheric events. The CDBG-DR program can be key to the recovery and revitalization of our people. The municipality of Orocovis responded to the action plan for disaster recovery, CDBG-DR funds, a draft published for comments on May, for the use of CDBG-DR funds and presented a proposal that provided specific details on the consequences of the impact of the hurricane and the formal request of the municipality to participate in the CDBG-DR funds. In the presentation, Orocovis showed projects of a strategic plan for the recovery of the municipality, the repair and construction of low and moderate income households, relocation of families whose homes are located in danger areas, the channeling of the Orocovis River, among others. In addition, the presentation of Orocovis in August which submitted the CDBG-DR "Capacity Assessment", requested by the Department of Housing, confirming its intention to participate in the funds CDBG-DR, program of rehabilitation, reconstruction and relocation of housing. The municipality of Orocovis evidenced that it is prepared and have the knowledge and experience in the good management of programs with the participation of federal funds.

During the past thirty years, Orocovis has received and administered regular and emergency CDBG-DR funds. And it is one of the municipalities with the highest performance in the use of funds. It has also carried out projects with federal funds, such as ARRA, Head Start program, FEMA and the Department of the Family funds. Our plan for the use of CDBG-DR funds intends to rebuild and develop Orocovis through housing rehabilitation projects, infrastructure improvements, community rehabilitation, tourism projects and canalization of water bodies.

With the development of the tourist offer of the municipality, Orocovis receives a large number of visitors who come to our town in search of an environment surrounded by nature, good

gastronomy and the hospitality of our people. Orocovis is the third destination in Puerto Rico most visited by tourists from other countries. The domestic tourist also visits our town. During the weekends, we receive excursions from different towns on the island of people who come to share in a healthy and family environment. To this day, Orocovis tourism development continues to recover slowly from the damages caused by Hurricane Maria. Through the city rehabilitation program, Orocovis can establish and restore the businesses of the communities and contribute to the development of our tourism. Eventually, Dr. Pesquera will be talking about projects in the municipality of Orocovis and informing about our recovery to contribute, accelerate the implementation of CDBG-DR programs. Dr. Pesquera has been attending the municipality of Orocovis in the rehabilitation process with FEMA and its presentation has our full support.”

PRDOH Response: PRDOH is very thankful to Orocovis for their ongoing collaboration, attendance and participation in this meeting, and providing such thoughtful and important feedback. With respect to the areas of focus for Orocovis, there will be a number of relevant programs that are aligned with these identified needs. These programs include the Home Repair, Reconstruction, and Relocation Program, City Revitalization Program; economic recovery programs including small business financing, revolving loans, workforce development, incubators and accelerators, and tourism and marketing. Program guidelines will be published on the program website, which will provide further detail.

Comment: #020_10-16-18_Jose A. Miranda (Casa Aibonito)

“I manage two housing projects in the town of Aibonito, one is known as Casa Aibonito, which is a project of ninety-nine () units for people aged or older, of limited economic resources. And the other is Hogar Aurora, a housing project of twenty units for people aged and older with some physical disability, also of limited economic resources. Both projects operate with federal subsidy. What you should know is that it allows a restricted operational budget.

The purpose of my presentation is to describe the situation of the housing projects that offer services to the people described above. After the damaged caused by the hurricane in our area, the people we serve went through great needs. Despite having a safe roof, they suffered greatly from the lack of energy, water and even food. Imagine an average resident going up some stairs to a seventh or eighth floor, which is where they live. Since it was almost impossible to sustain the energy with the emergency generators used by the projects. And because of the little accessibility to diesel fuel at that time, since there was no access to the town of Aibonito to take diesel to the projects, and we had to use the little diesel we had. Besides, we did not have any generator functioning all the time, that means that there was no water either, since the water pumps work with electricity. If this were not enough, the emergency generator only supplies power to certain common areas, so they could not cook as their units do not receive power from the generator.

All this created chaos in our elderly population and the people with physical disabilities we helped. Although we did the everything possible to cover their needs, it was very difficult to give them a better quality of life during that period. We also suffered because there was no water available. Both projects have tanks, but they are not enough to cover the demand for more than three days. Try to image this scenario, there was no electric power, the emergency generator rationed at

certain times of the day, without facilities to prepare your food and with rationed water as well, all because the pump system needs power. We were also lacking a tank of greater capacity. On the other hand, in recent visits of FEMA personnel to our facilities, we were recommended to have a diesel tank for the generator with a minimum capacity of ten days. At present we have a maximum capacity of two days.

Having all this into consideration, we came before you to ask you to consider the housing projects, like ours, in the distribution of funds for the reconstruction of our country. In our specific case, we propose the possibility of installing a generator, an emergency generator with greater capacity than we have at the moment. This will allow us to generate energy throughout the multi-story project in all units. We have already done our analysis and we have the approximate costs of these projects. In which case, Hogar Aurora will require \$225,000 dollars, and Casa Aibonito, \$350,000 for that type of generator, but its installation is possible. In relation to diesel tanks of the recommended capacity, it is also possible to acquire and install them in our facilities. But the projects do not have the funds to cover these needs.

Finally, the acquisition of tanks of greater capacity would guarantee a better quality of life for all our residents in both projects. In summary, both projects need to be considered in the granting of CDBG-DR funds that will be given to the people of Puerto Rico soon. We have the amounts, we have the estimates and we hope that these projects as well as other island-level projects like these are considered for this allocation of funds.”

PRDOH Response: Thank you for your attendance to the meeting, sharing your input on these important matters and bringing these needs to our attention. As part of the CDBG-DR portfolio of programs, a number of initiatives may be of interest to addressing the issues you have presented. The Multifamily Reconstruction, Repair and Resilience Program and Community Energy and Water Installations listed in the Action Plan are two that align with some of the challenges you are describing, and potentially the Community Resilience Centers may also be something your community may be interested in pursuing. Program guidelines will be published on the program website after approval by HUD, which will provide further detail.

Comment: #021_10-16-18_Carlos I. Pesquera: (Representative of the Municipality of Orocovis)

“Actually, I'm going to appear with two hats. First, I will make some general comments about my professional experience and then I will elaborate on several initiatives that are important for the people of Orocovis. I have submitted my paper in writing. I know that time is limited. What I am going to do is make a review of what is here, which includes the presentation. Essentially, I want to let you know that this project is a very large project. This is a project that will reach twenty billion in the development expression of the three stages. So that you have an idea of the infrastructure investment during the years. We include the transportation projects, the projects that AFI did for the development of used water system and drinking water. This amounted to six billion in a period of eight years. So, we are talking about twenty billion for a period of six years. So that you also have a comparative idea, the cost of a project like the urban train can be done

with, eight urban train projects with the available funds. That's what I want you to understand. We are not dealing with a simple issue but extremely complex.

When you make your presentation from the project point of view, these programs are twenty-eight programs. It is essential that the scaffolding mounted by the government of Puerto Rico be agile so that it does not become an impediment, so that these funds reach the municipalities. In the paper there are a series of recommendations in this regard, particularly, taking into account the lack of resources of the municipalities, the "cash flow" to make these projects and that will not be reimbursed, the capacity of professional companies to do this type of work and make sure that the work is mostly done by local resources. Regarding the municipality of Orocovis, it presents a great opportunity to make a demonstration project of this effort, since it is a town with a per capita income among the lowest in Puerto Rico, the number twelve. At the same time, it is a town of a very wide territorial extension. It takes an hour of travel by car to go from one to the other most distant points of the town. Therefore, the projects included here, for example, housing reconstruction and replacement are essential for Orocovis. The programs are designed here for families of low and moderate income; therefore, it is a case where the census carried out by the municipality for these projects is going to be taken into consideration.

The municipality understands that it can be the agent that carry out these projects because it has the experience, however, if it is going to be done by regional managers, regional "program managers"; It is important that these managers recognize and take into account the position of the municipalities in these projects. The municipality has as its main priority the channeling of the Orocovis River. This is a project that is under consideration of the United States Corps of Engineers and that has already been evaluated by them and, therefore, is one of the projects that can be included. Either as part of the vital infrastructure that is defined in the programs or as part of the strategic projects identified by the governor for Puerto Rico. This is a project that can have an investment between twenty and thirty million dollars and will help the economic development and the safety of families living in the urban area of Orocovis.

The program also addresses the revitalization of urban areas. The municipality of Orocovis can also be an example for this type of development, to make the urban center of Orocovis a place of economic activity, recreation and also healthy coexistence of its citizens. It is important to mention that there are large-scale projects, such as projects that stimulate tourism in Orocovis. Orocovis today is one of the main places of domestic tourism. We all know the famous corridor of the Longaniza route. But there are important projects, for example, road infrastructure that is to improve the corridor between Vega Baja, PR- to Orocovis, improving PR-137 highway and PR-155 highway to make this a safe corridor as well as an attraction to its residents.

To conclude, this is an opportunity that will not be repeated in many years. It depends on the ability and the management of the government of Puerto Rico so that these promises can be fulfilled. And it is also important that we fulfill the expectations of the population. From now on you have an arduous task of developing these programs, publishing the guides for these programs and that the people can then see an affirmative action from all of you. On behalf of the municipality of Orocovis, we thank you for this opportunity and we have these funds to take Orocovis forward for the improvement of your entire community."

PRDOH Response: PRDOH is appreciative of the comments provided, and the attendance to this meeting. The framing and context of the challenges to be solved on an aggressive timeline that were offered by Ing. Pesquera are also important to recognize, and PRDOH is in agreement that there must be strong collaboration at all levels to ensure success at this unique point of opportunity in the history of Puerto Rico. There are a number of programs that will be applicable to meeting the needs recognized, such as the Community Energy and Water Installations, Home Repair, Reconstruction, and Relocation Program, City Revitalization Program, Critical Infrastructure Resilience, Economic Development Investment Portfolio for Growth, and other economic recovery programs including small business financing, revolving loans, workforce development, incubators and accelerators, and tourism and marketing. Program guidelines will be published on the program website after approval by HUD, which will provide further detail on how residents and stakeholders from Orocovis can apply to access funds.

Comment: #022_10-16-18_Ángel I. Marrero (Representative of federal programs of the municipality of Barranquitas)

“I want to extend greetings from the Hon. Francisco López López, mayor of the municipality of Barranquitas and me, Angel Ivan Marrero Ortiz, Director of Federal Programs. I am going to make a summary. I am going to make it briefly, because we have already done this presentation in Cidra. Basically, regarding infrastructure, we have sixty-three bridges damaged, and I do it in a general way, with an equivalent of ten million three hundred thousand dollars. In damages on municipal roads, the total damages in different parts of the roads amounts one hundred and twenty-two, we have one hundred and twenty-two problems that we have in the roads for a total of 2.6 million dollars.

We have a problem, mostly in the area of housing, which is obviously an equivalent of affected units which amounted four thousand three hundred and fifty-eight (4,358); one hundred and twenty-three (123) of major damages, sixty-nine (69) of total loss. To this we should add that our municipality as well as other municipalities have a problem of ownership of the land. Obviously, half of us have submitted evidence, the other half has that problem. We need more support from you to see how we can help these families who need it so much. Obviously, it has limitations in terms of ownership. To become familiar with the process, we can be guided more to see how we can be directed to help the people who really have the need to fix their homes.

In the line of housing, in all the analysis we have done between buildings that are in the process of execution, and of the homes that are lost. Our intention is not to build houses, it is to use existing houses, such as houses in towns, abandoned buildings in the case of towns; obviously, to give life to the town and also the economic activity that this requires. If we do not do it this way, what is the purpose of giving a house, if people do not have money to pay for in this case? In this line, we are requiring around twenty million, which is the total projection. We know that there are many of us who have the problem here in the island.

Basically, the problem of Barranquitas has been at the rate of twenty million from the complete housing study that was carried out. In other damages that we have, in the area of the repaving

roads, which were fixed and then were damaged due to the hurricane. In that line we are asking for seven million dollars for repaving the municipal roads. There were many others from a particular project that we had on track, that is under construction, and which suffered damages too, which is the municipal stadium. Which is one of the projects that we are addressing in these meetings.

We need about million to finish it because, practically, what we have done is already destroyed. In general, the biggest problem in our municipality of Barranquitas is the houses, in this case. We need help, the municipalities need help. We should be considered as the engine or the people intended to receive the funds directly to the municipalities, because each municipality has its needs. And they are more effective because everyone understands the particular need in each neighborhood. If we do it this way, then we will reach the entire population by reaching all the municipalities. And we understand that in this way we streamline the processes and divide the burden between both the central and local governments, us as a municipality.

Truly, we need the hand and the help directed in this way, because right now we have suffered a lot in infrastructure of bridges, roads, municipal structures, mostly the homes of the residents. And the biggest problem is the housing, and we need your help on this. We need the help in all possible ways, as it has been said here and we need the funds to be distributed fairly to each one who is designated for that, as it was already described. We need more help, we need more counseling so that we can guide the public better. Because there is a lot of misinformation on the street and we need to help the general public. Basically, this is my presentation. I appreciate your help in the ownership of the houses and in assisting all the residents of our town of Barranquitas.”

PRDOH Response: PRDOH thanks you for your attendance and commitment to your community, and for sharing your comments and for the comprehensive understanding provided of the challenges and needs in Barranquitas. Further, PRDOH values the strong, collaborative working relationship shared with municipios and looks forward to working together in this comprehensive recovery effort. A number of programs in the Action Plan will be applicable to the needs you have highlighted, for both residents and for greater community needs. The Title Clearance Program, Home Repair, Reconstruction, and Relocation Program, and Multifamily Reconstruction, Repair and Resilience Program are some of the flagship programs aimed at addressing housing needs and ownership issues. For greater community needs programs such as the City Revitalization Program, Critical Infrastructure Resilience, Economic Development Investment Portfolio for Growth and the Community Energy and Water Installations will provide avenues to apply for funding for the needs you have described. Program guidelines will be published on the program website after approval by HUD, which will provide further detail on how residents and stakeholders from Barranquitas can apply to access funds.

Comment: #023_10-16-18_Yohalis Rivera (Municipality of Corozal)

“I represent the municipality of Corozal, the honorable mayor, Sergio Luis Torres. My presentation will be sent formally by email. And I'll be reading the extract, an abstract of it to record our

participation in this public hearing. I stand before you in my capacity as Director of Federal Programs and on behalf of our honorable mayor, Sergio Luis Torres Torres.

In order to respond to the publication made to come her and make a presentation in these public hearings regarding the funds of the "Community Development Block Grant Disaster Recovery." Aimed at achieving the recovery of Puerto Rico following the hurricanes Irma and Maria in the month of September. I emphasize this fact because many people talk about hurricane Maria and forgot that we were hit by Hurricane Irma before. Due to our geographical location, we are extremely vulnerable to the impact of storms, hurricanes, cyclones and urban and river floods. We propose to reduce the associated vulnerability and damages through infrastructure works of economic vitalization, housing projects and non-structural measures.

The municipality of Corozal faces the great challenge of restoring an infrastructure seriously affected as a result of the scourge of Hurricane Maria. What we knew as normal, as everyday life was changed by Hurricane Maria. We lost homes, totally and partially, shops were closed temporarily and others permanently. Unemployment has reached numbers previously unregistered. The municipal collections for the concept of IVU have fallen to worrying levels for the municipal treasury. In short, it is another reality after the impact of Hurricane Irma and Maria. The funds of the "Community Development Block Grant Disaster Recover" will allow us to address unmet needs mainly for housing recovery. However, the damages caused by both natural disasters impacted the road communications infrastructure, as well as the economic movement in general.

From a broader perspective, the activities of, and for the economic rehabilitation of infrastructure that we propose to develop with CDBG-DR funds will be linked to promote the best quality of life, build and meet needs for safe housing, not covered and promote an infrastructure with greater resilience to the impacts of storms and hurricanes. Our goal is that economic revitalization and infrastructure activities contribute to long-term recovery. And the restructuring of housing in the most impacted sectors through the municipality. The municipality of Corozal has currently a large number of deteriorated, abandoned and disused properties. These residential and commercial properties have become a public nuisance. And some of these properties were abandoned once the hurricanes occurred. Others have been abandoned for a long time. The deterioration of the properties is affecting the safety and health of the surrounding communities.

We also propose making areas with permanent housing because we had some damage according to the Municipal Emergency Management and Disaster Administration Offices, with six thousand, seven hundred and seventy-one affected housing units. We also wish to supply and build new housing units for the relocation of families whose houses are in high risk areas due to flooding and landslides. We also wish to acquire existing vacant housing units located at different areas of the municipality to relocate families who lost their houses as a result of hurricanes. Reconstructing and rehabilitating the occupied housing units for tenants who were affected by the hurricanes. Acquiring non-residential vacant structures in units, sorry, in residential units, for rental with a purchase option.

And I'll go a bit faster because it's very important to mention the reconstruction of municipal roads that are severely deteriorated. The construction of contention and retention walls in landslide areas, reconstruction of infrastructures of stormwater improvements. We also need to rebuild

and build bridges and channel several stretches of the Cibuco River in Corozal. This is only a summary because what we propose for the municipality of Corozal is very extensive. We hope you can consider us so that we can all benefit this town who needs it so much.”

PRDOH RESPONSE: Thank you for your attendance and commitment to Corozal, and for sharing your input and providing PRDOH with a better understanding of the challenges and needs in your community. A number of programs in the Action Plan will be applicable to the needs you have highlighted, for both residents and for greater community needs. For greater community needs, such as addressing blight issues, programs such as the City Revitalization Program may be applicable. For other community needs, Critical Infrastructure Resilience and Economic Development Investment Portfolio for Growth. These programs will provide avenues to apply for funding for the needs you have described. For housing, programs such as the Title Clearance Program, Home Repair, Reconstruction, and Relocation Program, and Multifamily Reconstruction, Repair and Resilience Program are some of the flagship programs aimed at addressing housing needs and ownership issues. Program guidelines will be published on the program website after approval by HUD, which will provide further detail on how residents and stakeholders from Corozal can apply to access funds.

Comment: #024_10-16-18_Edwin Torres Jiménez (Engineering Director in the municipality of Barranquitas)

“I’m Edwin Torres Jiménez, engineer and Director of Engineering in the municipality of Barranquitas. I’m also de executive director of the ABC Consortium, Aibonito, Comerío and Barranquitas. Good morning, everyone. Basically, I would like to focus on two of the many projects there are. But only in two.

The first would be the municipal cemetery. We have a problem with the municipality's cemetery. Given how old it is, we've had some problems with certain graves that have fallen over and turned around due to the rain, and we also have a problem with the Department of Health. And, to be able to comply with them and due to a series of situations that we've also had because of hurricane Maria, such as landslides, there are some fences that fell over. Both situations have combined. The situation is a bit complicated.

In order to prepare a master plan to comply with the Department of Health, we need, among other things, to relocate housing. We're very close to the site. I need to relocate houses because we need to build some contention walls, given to how close the graves are to the fences because we have the option to relocate graves or to simply move the wall away, which would be easier. But, at the same time, we need to move it away from the fence, which means putting it closer to a residence in the area. And, well, we need funds to relocate the people because we don't want to just send them away. We want to find them a home.

These improvements would mean improving fences, which would help with security. We also need to build bathrooms and improve the facilities for employees and for those who come visit the graves. We need a parking area too. To have a more accessible entrance, both for vehicles and

for pedestrians at the cemetery. And that's why we are making estimations with blueprints, relocation and improvements and construction, for about four million. The second project, which we understand is very important among others, is the walkway that is right here next to us. The walkway includes a path, a bridge and the lookout. It suffered many damages during the hurricane because there was a landslide. There is also a stair that connects the bridge to the lookout, and it collapsed.

We need to find alternatives to repair it. At the same time, since the lookout is on top of the mountain, the hurricane winds caused a lot of damage. And we need to repair all of it. The walkway suffered less direct damage, but due to the landslide, which is not obvious at first sight but when you get in you can see it in more detail, it is obvious in the slope of the mountain that it needs stabilizing. And we need to build about six or seven contention walls. That means about three million dollars. Obviously, we have many more projects. I wanted to focus into these two because I know that a different part of the municipality has talked to you about other projects. But, I understand that these two are very important for the municipality.”

PRDOH Response: PRDOH thanks you for your attendance at this meeting and for providing input on your community’s needs. Municipal projects, like some of those listed here, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #025_10-16-18_Carlos Alicea Rodríguez

“In Barranquitas, people know me better as Carlos Impacto. Well, I would like to talk just not about what is important to me, but to my neighborhood, because there are a lot of people that are living under tents. I haven't had any electricity for nine months. I don't have any electricity right now because the house gave way, including the well, the wall, and everything. At the room where I sleep, four zinc plates gave way. They're with the blue tents because I set them up myself, not because they were set up by FEMA. I've already changed them four times because the site is tall and it's very windy, so they get loose, and you have to be... I once wanted to install them myself so that I could save some money, but when I climbed up there, I had to come down because I couldn't.

My house is broken right now -- such a big landslide -- and the house is about three feet away from the abyss. That was difficult because, after fifty years, my wife had to pick up everything and take the kids to Orlando. I live by myself. My birthday is next November. My house had some pillars looking out, and some sort of wooden balcony. Even though the house is made of cement, the roof is made of wood. And there are some pillars where the balcony was built. Three of them are broken.

I had to hire a contractor with chain machine, an excavator, a digger, two pieces, and to start lifting from below. Thank God, I had a tuff stone mountain next to me - and we were able to go over a hundred feet up to at least make the house livable. But, right now, I'm using the bathroom only to shower and to do number one.

For number two, I have to go to a neighbor's house. They love us very much, they have a gazebo and they gave me the key to use it. In my room, about four zinc plates are missing because my house is tall, a tall chalet-type. And it's about four zinc plates on that side. And on the balcony side, which is part of the house, it's about ten plates and some panels. As for the rest, as I told you, I've spent about nine months without electricity. Your Home Reborn came and gave me, almost nine months after, because it brought me an electrical plant on Saturday, and I had electricity on Monday. If it had come before, I wouldn't have gotten it either. Because FEMA, I've requested it three times to FEMA and they never put up even a fence. I've set everything up. And the last three times I requested it, they sent me one thousand, five hundred and something pesos. I think it was so that I would leave and not come back. Well, my house is those conditions, just like many others in the same neighborhood, Quebrada Grande de Barranquitas.

I would like to see your program. I congratulate you because it's like seeing a light at the end of the tunnel, since I don't depend on social security anymore. The people who filled everything made the hole for the well wall. But, since I haven't had anything to finish it with, it's in those conditions. I want to thank you and I want to thank the federal government because they brought this plan. When they announced it, I said, as I just said, that it is like I'm seeing a light at the end of the tunnel. I hope this is useful. I want to give you many thanks. And well, we expect your help if possible.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #026_10-16-18_Gil Mercado (Advisor of Federal Matters in the Municipality of Naranjito)

“I'm here with the Director of Federal Programs for the municipality of Naranjito. I'm Gil A. Mercado Nieves, Advisor for the municipality of Naranjito. Firstly, we want to reference a presentation, the first we asked at the municipality of Arecibo, and we would want you to consider said presentation during the one we will give this afternoon.

As everyone is aware, the municipality of Naranjito was one of the municipalities that suffered the most damages during the Irma and Maria hurricanes. We have several projects that are specifically addressed at the action plan that you're contemplating and that the department is contemplating for HUD in this round and also during the past one.

The first is the extension of the channels on the Guadiana river. All of these projects are located in the urban area. And they also involve the infrastructure and revitalization of the urban area. This project obviously contemplates the continuation of the channeling of what had been started at the time of the hurricanes because the channeling wasn't finished due to the rains. Obviously, the entire urban area was flooded, and that affected all commerce and offices, etc. In other words, it was practically inoperable. The entire urban area was completely inoperable due to the damages caused. We discussed this project in the first presentation and we understand it has a

high priority since it combines urban revitalization and infrastructure, which is one of the priorities established in the action plan.

Also, the extension of said channeling is part of our project, as well as replacing the ford bridge in road 825, which connects to the urban area and the Mercedes Rosado school. We also mentioned that project as part of the revitalization, located inside the urban center, where there is an imminent danger because it is close to schools and, obviously, the urban center. The presentation obviously details all the minutia of the project.

We also have the expropriation of the properties located in the west side of the private parking lot, next to the town hall, the ford bridge, the Bur bridge, in the Frank Morales street, to improve the natural course of the Guadiana river on the north side of this land, which will be used for the public parking lot. In other words, it's a project we've been submitting to the department through a CDBG so that we can build a center and a parking lot. The project is necessary so that we can combine it with the project we're submitting to said agency as part of a loan.

Also, and this is extremely important, we have the rehabilitation of the infrastructure in the special El Cerro community. It is known, very known, that El Cerro is located in the same city center, in front of the townhall. Obviously, El Cerro urgently needs the rehabilitation of all those units. We have blueprints, we have a design already and we need to assign funds to make the improvements regarding that rehabilitation project inside the urban center that, obviously, agrees with the action plan. The public nuisances, the construction is intimately connected to economic development, and at the same time, it is a tool when the objective is to provide the services that answer to the community's effective demand. In this case, well us, or rather, the municipality, has already declared several usable properties as a public nuisance. These can be rehabilitated so that the houses in the urban center are accessible and meet all of the HUD's standards.

We also have to rehabilitate the building, build housing units in the old hospital. I want to point out that the municipality owns those lands, is located at the urban center and intends, or what we intend, is to build some houses to rent. The municipality agrees to rent, and obviously, will give priority to low-income people and to disabled and elderly people, and will revitalize; it is part of the urban center's revitalization.

Lastly, there's also a sanitary sewer system in the area of Matadero, in road number 5. Obviously, due to the lack of time we must submit our proposal in writing in a certain timeframe. I would say in a day or two, so that we can go into more detail of what we, in five minutes, were able to explain this afternoon. We emphasize that all projects meet the standards, and specifically, the objectives established under the city's revitalization program. All of these projects are addressed to that program."

PRDOH RESPONSE: Municipal projects, like some mentioned in this comment, may be eligible for assistance under the City Revitalization program. More information about the program, including how to apply, will be published at www.cdbg-dr.pr.gov, when it is available after HUD approves the program.

GUÁNICA

Comment: #027_10-18-18_José Roberto Pérez

"I'm an appraiser with 43 years of experience and I've spent... I've lived... And I've worked with other appraisers. When Hurricane Eloisa, in 1975, approximately on September 21st, and as such, I've lived through other hurricanes and I've very experienced in the appraisal part of the affected properties. As I mentioned, I'm representing myself and my peers,² because as an appraiser and consultant, many people come to me to ask me about my experience and profession. They ask me what alternatives they have before the CDBG program and what results to expect. My presentation is short.

I congratulate you, firstly, because of the work you're doing in the entire island. As I said, this will be very short. If a person or family was living in an area prone to flooding on September 20th and sold their property, what happens if they sold it and bought a new one. What results should they expect? If, even while being in a floodplain, they don't want their property destroyed, as is planned in many places, like in Luchetti, for example, or in other places, what can that person expect? If they already purchased and sold the one they had, and they lost money in the sale because it was worth 100,000 and they sold it at 40 and purchased another one, what can they expect? And lastly, I want to ask what's the alternative or when can we expect to see the results of these programs that are being implemented or that are being proposed but, above all, I'm interested in Yauco because, since I'm from Yauco, it pulls my heartstrings. I have a lot of friends, a lot of family that are interested in my help, to at least guide them, answer their questions and so the question is how long must... When can we start seeing the results of the relocation or the entire program implemented in Yauco.

Thank you so much, and I truly congratulate you for this initiative of bringing these presentations to the regions so that the entire town can be informed. Thank you very much. Have a nice day. But my question really is how long, once the program is approved, if I have a house in Yauco that is susceptible to flooding and that was greatly affected... Once the program is approved and once it is approved that my house will be destroyed or that I will be relocated... How long after it is proven that I qualify or that my property qualifies, how long will it take to relocate me or to solve the problem, to get the voucher or however you will solve it."

PRDOH Response: Thank you for your comments. Housing programs are outlined in the Action Plan. PRDOH anticipates that some programs will begin in quarter one of 2019. Information regarding how to apply for assistance will be posted at www.cdbg-dr.pr.gov, as part of program guidelines, when available.

Comment: #028_10-18-18_Miguel Santana

"I love this because I'm reading "Building and Transforming Puerto Rico." I imagine, and a lot of money is mentioned. I imagine this will help us... This will help almost a million people in Puerto Rico who are going to bed having only one meal or no meals at all. This will help improve things and the social inequality that right now is the third... we're the third place in the word in social

inequality, and it would be good to change that because those two numbers only tell us how we are, even if the television and all places say we're good, and good, and good, but that's not the truth. I'm representing the El Retiro community in San German.

The El Retiro community in San German has been a community for about 100 years. It was created by some farm owners who offered a job to people and gave them the opportunity to build their houses there, which made them tenant farm workers, not homeowners. When in the... Right now, the community has a court, some benches built by the community, a platform and well, the court is unique in Puerto Rico, right? The court was built in the community's road and when there is a basketball game and car drives by, they need to stop the game to let the car go through, and then they can continue.

Also, Hurricane George really devastated this community. All the people residents had to get mutual funds to fix their houses because they didn't have property titles. They didn't receive a single cent from the Puerto Rican government or from the municipality. This means that all of them had to do whatever it took to move forward. When it comes to special communities, "ah, wonderful", and the Department of Housing, we saw... We saw the light. A draft is prepared first, a draft is prepared for 45 people and it was valued in about twelve million pesos. For these purposes, as the government passes, that is a lot of money, and we have to reduce it. It is reduced to eight million pesos, and we have to prepare another project, we need to modify and prepare another project. But still, eight million pesos is a lot. We have to undertake another project.

When designing these projects, I imagine that at least a few millions must have been spent, and then the third project is prepared. The third project undertaken, comes out... Then the construction of the project could come out to be six million because the current mayor, who has been in office for about 20 years, expropriated the... He expropriated the lands, and with the special communities project and because the municipality owns the lands, when the houses can be built, as expected, an exchange could be made, where the new house would be given to those who had the old house. The municipality would give the lands, gives them for free. The house was supposed to be free, and then they would give the deeds and they would have their own house in that project. This still, when this six-million dollar project is done, it goes to the bidding that needs to take place, the bid, what they bid... Then they say that six million dollars are not enough for the project and it's not done.

The past government then designs another project. In other words, we're talking about a huge thing in the middle of the 20th, 21st century. It's unbelievable that people are still living under the same conditions... Without having their houses, there can be no cement houses, they don't belong to them, they belong to the government now, but we're building and transforming Puerto Rico, right? And what I'm hearing here, and we would like, and it would be great if this community could really be heard. This community is about ten minutes away from the San German townhall, but you go inside and you don't see it. You could be looking all over San German for it and wouldn't find it because there is an entrance to the community and the community is practically a field. It is a field inside the city.

The place is gorgeous but, sadly, due to the situation, about two to three million pesos have been spent on designs for projects that have not been undertaken yet. I once went to the Department of Housing and the first miniature, because they took a miniature with them, was beautiful. It was

in a hallway at the Department of Housing, and they were presenting it as a model of what had been done. I went there and spoke to the person and said, "Look, this hasn't been done yet". And you know what they said? "Ah, we thought these were some villas". How unbelievable. That's something to say and not believe. Because not even I believe this is still happening in Puerto Rico, and I'm the one telling you about it."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

PRDOH agrees that planning works best when it is community driven and involves municipalities and non-profit or community groups. PRDOH has designed programs such as the Whole Community Resilience Planning with those considerations in mind.

As outlined in the Action Plan, PRDOH will use traditional and non-traditional methods of verifying ownership. In addition, the Title Clearance program offers homeowners assistance in obtaining clear title to property.

Comment: #029_10-18-18_Pablo A. Rivera

"My name is Pablo A. Rivera and I'm representing the El Retiro community. My partner already sort of informed you of the needs in our community. As for me, the area in which I'm living, to get to my house I need to cross two houses. My house is about fifty meters away from where I leave my car. I have to cross a gate, open a gate, and I've been disabled for 20 years because I'm incapacitated and want to see if it's possible, because we don't have access, ambulance, because the accesses are unlimited. Like I said, I have no access to ambulances, to the fire department, our things are... they've been like this for a while, which means it's been unsafe, they are... it's not a safe house, I want to see if that's taken into consideration.

We've been waiting for about fifteen years to be taken... For them to be aware of our problem, to see if, in the near future, the next time I come talk to you, it will be to thank you for having solved the problem. That's what I expect. Thank you for giving us the opportunity. Sincerely, Pablo A. Rivera... Yes, because like my partner said, that neighborhood is... One of the neighborhoods that is closest to the urban center, we lack sports facilities, sanitary facilities... Our community has a festival that has taken place for years, you know? In this neighborhood, there is a very tight community ah, and in our case, the peculiarity is that all ownership titles that were going to be given by the mayor, which I said... Well, that I... Which is where we, where I live, is a group of houses, you know? The houses are all badly located and that's the problem with the access."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and

offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

As outlined in the Action Plan, PRDOH will use traditional and non-traditional methods of verifying ownership. In addition, the Title Clearance program offers homeowners assistance in obtaining clear title to property.

Infrastructure projects may be eligible under the FEMA Coordination, Critical Infrastructure Resilience, or City Revitalization programs.

Comment: #030_10-18-18_José Ramírez López

"I'm the Director of Federal Programs in the municipality of Lajas, and I'm here representing the mayor, who is in the public hearings in Ponce as well. My presentation will be short. I only want to let you know that we already informed about the projects we had thought for the town of Lajas in the Ponce presentation, and, at the request of the mayor, we are here today as a reminder. They're a few projects of... We comply with the infrastructure, housing and the economic development and public services. We have a few housing projects that are... The municipality already has two lots that belong to the municipality. The mayor wants to build two complexes with fifty apartments each. One will be for regular citizens and the other will be for elderly people and includes a mall. And well, he's also thinking of commercial offices such as doctor's offices and facilities for the elderly¹ who will live in those houses.

In the part of the infrastructure we have... The mayor wants to repave at least 80% of the streets that were damaged by the hurricanes, streets and municipal roads. It also has the rehabilitation and construction, and the reconstruction, sorry of ditches and sidewalks, which were also affected by the hurricane. And, regarding economic development, he also wants to expand the home service... The home assistants for at least two years, fifty people to help fifty families, and he also wants, apart from the help given by the insurance and FEMA. He wants to rehabilitate the mall that was built over 20 years ago using CDBG funds, and the movie theater, which is a... They show movies, it's something for the community that is practically not working now. And based on that, that's our presentation. He told me that before the 21st, if he has any amendments or any comments to add, we will do it over email.

PRDOH Response: Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Housing programs outlined in the Action Plan are not geographically restricted within Puerto Rico. Residents of Lajas may be eligible to receive assistance.

Comment: #031_10-18-18_Manuel Díaz Salgado

“Manuel Díaz Salgado, AH Enterprise and Housing for the Elderly. The latter is a non-profit organization. I will be brief. I want to know, well, to give... For other people to have the opportunity. I come to join the people, many people who have stated their concern regarding the sectors that are 60 years old or older. We have some health today, and it's not the same in the future. And I think that I don't have many needs right now, but as we get older, we have more needs. I'm not opposed to all the elderly people to get help with relocation and to get help to improve their homes, but I would also like to raise this concern.

During times of emergency, we understand that it is more feasible and more effective to attend to this population in what I haven't seen in Puerto Rico, however these types of communities are, elderly communities with amenities, and I'm not thinking about the classic type of structures where they put elderly people. No, I understand that elderly people now are very active. Yes, we are vulnerable, and I imagine that that has been talked about a lot here, but I understand that we also need to think outside the box. Maybe we need to start looking at this type of concept where they are communities that may have that same kind of agricultural support. They may have the right infrastructure, and maybe we need to stop looking at the... To continue putting wastewater underground.

Nowadays, technology provides wastewater treatment plants that can be taken in that area in the tertiary system, and in the secondary system, said wastewater may be used as irrigation, landscaping, etc. The Environmental Quality Board, I know it might not be the forum, but it's not helping a lot in that regard because of the type of regulations. I think the wastewater law must be amended or reviewed so that it allows, without the method... Late methods to approve plants that are effective and friendly to the environment. Likewise... Because technology exists and it's not expensive, and probably because we're talking about 30 dollars a month per maintenance unit, that we take a toilet to these homes or complexes or to these centers, such as the one I'm raising today. The toilet is probably more expensive and we would be placing a more expensive economic burden on people with limited resources. In other words, let's look... My contribution is that we should look outside the box.

If there is an opportunity with some money now, let's see not only how to fix what was broken, but also let's see how to fix it in a way that it doesn't break in future. Once again, I know that, at least, I'm from Mayagüez. The population in Mayagüez is about 76,000 people, according to the 2017 census. Seventy-six thousand and a bit more. Also, the Office of the Advocate for the Elderly acknowledges that Mayagüez has a population of people who are 60+ years old that is about 20,000 people. And I understand that, if we want to help this population effectively and if we want to remove some burden from the government, we can think about how these community centers can be somewhat self-sustained or about 50 to 60% self-sustained, both in terms of energy and water resources, and to shelter people because it's easier to treat them when they're all together than when they are dispersed all over the town or in a city, because then the state has to invest more resources.”

PRDOH Response: PRDOH agrees that building back in more resilient ways is important and that the welfare of the elderly is extremely important. Several programs outlined in the Action Plan, including the Home Repair, Reconstruction, or Relocation program, prioritize

elderly applicants. Thank you for your suggestions. PRDOH has taken them into consideration.

Comment: #032_10-18-18_José Valentín

"We are here as a non-profit organization. SACED is the Organization for the Community and Economic Development of Sabana Grande, a non-profit organization founded in 2010 by the leaders of the Sabana community. Our mission is to find a social justice tool for the economic development of our community. Since 2011, SACED has identified the community's needs and has looked for a way to help provide solutions for them. We've managed to identify needs and solutions in our community, and the merge of several entities and community leaders into a group of coalitions, obtaining the first COMPASS proposal for the prevention of the consumption of drugs and alcohol in young people, and we've been working to create other coalitions. We are here with several leaders from other municipalities who are also working with coalitions.

Among the direct help that SACED provided specifically those who survived Hurricane Maria, there is the help, support, coordination and monitoring of activities regarding the needs of the communities. Our biggest accomplishment after the devastation produced by Hurricane Maria were the direct, effective and fast help programs for the most affected communities. Among the direct services provided by SACED to those who survived Hurricane Maria, we managed to assist, refer and identify resources, which is what we've been doing today, looking for resources as supervisors of the case handlers, that we're working for SACED's DCM. We've been working only for four weeks and we already want to get some help so we can perform the work they need. People have been roofless for about 400 days already and we want them to get roofs for their houses.

We're helping with the reconstruction of those blue roofs, making roof repairs in homes through the FEMA's VALOR program, which only provides construction material and we, as a community, are raising funds to pay for the contractors to do the repairs. Also, our main focus when helping the community is for the disaster administration program, DCM, to cover not only Sabana Grande, but also to cover San German, whose mayor was here right now, Sabana Grande, Yauco, Guánica, Lajas and Hormigueros. And the mayor of Cabo Rojo requested us to help Cabo Rojo as well, so we're also looking for a way to help the people in Cabo Rojo, and we're working with those specialists, which are also here with us today. Through this program, we provide 18 case handlers, professionals to treat clients for the long-term effects of Hurricane Maria. The needs that were caused by the hurricane and which haven't been met yet are still everywhere. This is the first time that FEMA launches this program in Puerto Rico and we were one of the entities who got that grant.

One year after the hurricane, the need is so big that, in only one month, over 350 families with unmet needs were identified. SACED, with our own effort and work, have managed to give 18 Sabana families decent and fair housing after the disaster caused by hurricane Maria. Our biggest concern is to succeed in having the help reach and be received by the people and families with the biggest needs. Because of that, we think that the best way to achieve development and progress is through community organizations. That's why we suggest the help from the repair, construction or relocation program to be mostly based on help repairing rather than relocating. The process

must be transparent and the flood areas and floodplains must be defined. Communities with a high cultural heritage should not be eliminated because they are the most marginalized in these vulnerability processes. The repopulation of our traditional city centers and the use of abandoned structures where business management is present in a community economic development plan must be considered. I would like for my comrade, Andres, to speak about the recovery as well.

Yes, my name is Andres and I think that one of the most common situations we see is the needs of elderly people who don't want a relocation and who wish to rebuild their houses right there. Also, something that has become extremely difficult is to recruit to perform the reconstruction. I know that, as part of the project, there will be a training program where we can possibly kill two birds with one stone, where housing can be rebuilt and at the same time, where young people can be trained to rebuild houses."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

PRDOH values collaboration with community groups and looks forward to a continued positive working relationship with community groups and other stakeholders throughout the life of the grant.

Comment: #033_10-18-18_Lisette Fas

"My name is Lisette Fas. And right now, I'm working with SACED and I can testify that, through SACED, even smaller organizations such as the one I also preside, which is called Cafiesencia, managed a coalition and joint efforts to not only recover houses, as is the case for Cafiesencia. We work mostly with coffee farmers and we also have other projects with SACED to get... The mountain, which, as you must well know, suffered a lot, and especially coffee farmers. The hurricane took over 90% of the harvest, and that means we won't have coffee as usual in Puerto Rico for three years. What does that mean? What will those farmers do to support themselves?

We've proposed, and this will be part of the information we'll send by email, the National Coffee Trekking Route Project. We're working with about twelve municipalities and we'll be helping small coffee farmers to give them an opportunity to obtain additional income. This will be not only while they recover and create their own plant nurseries, as we've already been doing with the Yauco nursery, but we also want to provide help beyond what is being done right now because, after the hurricane, there has been special interest in a type of tourism called tourism... Or it's voluntarism, right? This is a voluntarism where people help, community tourism, and we have people waiting for it. It's a project we're working on right now... They gave us USDA funds, but we only made it to the design phase. We'll be requesting funds for the agricultural and the economic development part regarding the implementation.

Once again, thank you very much for being here for us. Notice that the people in the west side organizations and in the entire island (as people from San Juan call it, "the island", right?), have

community abilities and well, we don't want to see funds going to bigger foundations or entities in the metropolitan area in the future. Thank you. I want to talk about a particular project we started with the municipality of Yauco. It's in the private sector, municipality of Yauco, the University of Puerto Rico and us, preparing coffee plant nurseries where we will be giving coffee seeds to coffee farmers without any cost. This is barely the beginning because there's also a renovation stage precisely to incorporate them into the trekking route. In other words, what is taking place in the Rio Prieto neighborhood in Yauco is the example. It is the pilot program for the rest of the area."

PRDOH Response: The Re-grow PR Urban-Rural Agriculture program is a food security initiative which may provide assistance to urban or rural, large- or small-scale agriculture, livestock or aquaculture installations. Thank you for your comments. PRDOH will take them into consideration during further development of the program.

Comment: #034_10-18-18 Israel Román

"My name is Israel Roman, president of Surcando la Historia en Lajas, a community-based organization that is focused on rescuing, promoting and spreading our history and culture, and right now we're also working with SACED by creating some type of coalition where we aim at helping communities. During the past few emergencies, we've been working with the municipality of Lejas and the AOM, as with other organizations such as Club de Leones, Centro Cultural, which are focused on the administration of resources for people in need. Given that there are so many candidates or people in need, the municipality wasn't able to cope. In Calle Abajo, which is a community with about 80 families, almost 90% of the population is made up of older people who live by themselves and who receive no type of help, and the center is an old firehouse. In that center, we took care of distributing food and water, house by house, in the communities.

In Surcando La Historia, we're preparing right now and we've been training because we have four members with KP4 licenses, and we're in the second phase to get the general license. The idea is to establish in Parque de Bombas, we already have the antenna and the power supply, now we only need two transmitters to prepare some type of emergency station. In case of emergency, we can use these facilities to link this community to the administration of emergencies in the communities. And now that we're working with SACED, which has lots of experience, we can replicate what they did in Sabana Grande into Lajas by being that community link and by being the right hand of the municipalities and the different government agencies, where we can give them more services and make sure the effort is not lost.

Also, in the sequences we've established in Lajas, we're working together with the municipality to see if we can acquire a school in the Candelaria neighborhood in Lajas. It is an elementary school with eight classrooms, which is closed and is not being used. We presented a strategic plan to the municipality and to Planning where we aimed to establish a communal center in that school because the neighborhood doesn't have one. In the dining hall and storage parts, we want to establish a permanent community kitchen and a supply storage room. In another one of the classrooms, we want to establish a room where we can keep cots and mats so that, if there's need, we can already have an established shelter there. We don't need to close the public school

that is being used and we can use that shelter for those communities. In Lajas, there are about four other schools closed where we can replicate this, where the community will take care of the facilities as such.

That's important because we want to create a coalition in Lajas with different Clubes de Leones, cultural centers and different community organizations that are helping us out. And now, working with SACED, we can expand what we're doing in Sabana Grande and what we've done in Lajas to other neighboring towns. And in the KP4 part, what we're trying to do is create a network, both with the neighborhoods and the state AOM office at the town, and with the regional CD5. We're trying to create a type of communication where the basics can be locally challenged and to get the right things to where they are needed. Thus, creating a sort of protocol to meet needs. And we should emphasize that organizations such as SACED, which are small organizations in small towns, are doing big things with little resources.

Maybe, for example, Your Home Reborn, spends millions to build a house. With a tenth part of that, with what Your Home Reborn used to build a house, SACED could work with five to ten houses. This is all with voluntary help and with the work of the same communities. We appreciate the opportunity and for giving us the time to be here. We are at your service... And this is essential because the school is not being used. It's a matter of having the resources in those communities. We need to have perishable food available in case of fatal events and weather-related tragedies. We could have the resources... We wouldn't need to move people or resources because they would already be there. And the same communities would guard those resources. This would even include the maintenance of the facilities. The same community will be in charge of giving it maintenance. No investment would be necessary and so this is a good initiative."

PRDOH Response: The Community Resilience Centers program outlined in the Action Plan aims to create or rehabilitate emergency response centers. PRDOH thanks you for the work you've done in helping communities recovery.



MOCA

Comment: #035_10-17_18 José E. Aviles Santiago

“For record purposes, we are José Enrique Avilés Santiago, mayor of the municipality of Moca, and Miss Idalis Díaz Muñiz, coworker at the Office of Federal Funds. I would like to start by once again thanking the Department of Housing, the Secretary and the Governor of Puerto Rico for the initiative they've had of distributing these hearings at a general level, right? In different areas of Puerto Rico to give us the opportunity. I think that you were very clear in your presentation. Of course, the Project is very ambitious, as was mentioned, right?, by the citizen who asked where he could find the information, and you explained that very well already.

The truth is that we've all been experiencing things due to Hurricanes Irma and Maria. As I said at the beginning, there are some... Or there are many questions in all of the communities, and that is why it's very important to continue giving people the opportunity to get an answer to their questions, right? Both citizens in the municipalities of Puerto Rico, right? And the municipalities like the first-hand entity where people have the opportunity to arrive, as was proven in the hurricane, right?... We were those who, along with the communities, were able to provide services and could give our people immediate assistance because we are very concerned because there are some things that, as we know and as it has come up, right?, which hasn't received any type of help from FEMA for whatever reason, and there are still many people in need. One of the things that worries us a lot are the landslides that have taken place there the houses that are not covered by FEMA because they are not necessarily on a state or municipal road.

So, we hope that this project can finally somehow provide relief to the citizens who have made a big effort to establish a residence in those houses, in those places, and whose homes have been affected. Lastly, we are worried because, as you said, the news say that when it was talked about the \$50,000.00, it rained... that's what happens to us at the municipalities, right? And it's important to know who is going to administrate the funds, if those funds are going to be through the Department of Housing in the regions, if they will get to the municipalities so that we can explain it to our constituents. The way in which the people will be trained, right? The people who have an income, if they don't have income, what type of income, what amount of income because it requires to qualify for that type of help, and it will also be important to clarify these things.

And even though we know that the media and social networks broadcast it, it is also important to do this through the media or local communication means, radio stations or local TV stations, to provide the information needed by those people, especially elderly people, who don't have as much access to technology, so that they can receive the information as well. In past hearings, we submitted a series of projects that are basically aimed at the different subjects, right?, at the four main subjects that were provided to us, and well, it's very, very important for us to be able to... At least we received the news today, right?, that we'll soon be receiving more appropriate and accurate information regarding the requests that have been submitted.

Our Office of Federal Funds and I prepared these projects with the Office of Planning, aware that we could fulfill the requirements established by you, but above all, also meeting the basic needs

that are predominant in our communities. For example, one of them is road 125 here in the urban part of the town, where we have two urbanizations that may be affected if work is not performed, like they were affected during the hurricane due to flooding. We have communities, such as Parcelas Lomas Verdes, one of our communities that lack a sewage system and it is a millionaire project where water doesn't filtrate properly. This is also a health problem that could endanger the lives of the citizens, right? And therefore, it could cause other problems for our communities.

So, it is very important, and I ask you to keep direct contact with the citizens, as I know that is the Governor's and the Secretary's intention, and those are the intentions of the agency you represent here this morning. I ask you to be aware that, right?, that we can continue being empathetic with all the citizens so that, to the extent that we are all empathetic, we can give our town the tools it needs, and bring peace and relief because there are still many pending questions."

PRDOH Response: PRDOH appreciates the attendance of the Mayor of Moca at the public meeting and recognizes the importance of the information shared about the challenges facing the community. PRDOH values the strong and collaborative working relationship it shares with municipalities. There will be a number of programs aligned with the needs in Moca, such as the Home Repair, Reconstruction, and Relocation Program for homeowners, and the City Revitalization Program which is intended for municipalities to apply for funds to address the needs described. Further information about these and other relevant programs can be found in the Action Plan, and additional details will and program guidelines will be published on the program website, which will provide further detail on application timelines and eligibility. Also, HUD requirements for all CDBG-DR funds expended under this entire program require that 70% of the full grant benefits LMI persons. With respect to access to programmatic information and ensuring all community members including the elderly will be provided information, PRDOH appreciates this input and will ensure multiple avenues of information distribution are used in outreach and communications efforts regarding programs.

Comment: #036_10-17-18_Ramón Rosado Muñoz

"I'm here today because a wall fell down due to the weather and divides both urbanizations, the Gonzalez Community urbanization and Colinas Verdes. Then it's affecting us. It is in that territory and no one has done anything, and so we're moving the community."

PRDOH Response: Thank you for your comments. PRDOH values the input of community members and providing input on challenges at the local level. The City Revitalization Program and the Whole Community Resilience Planning Program appear to be aligned with the challenges you are describing, and more information on these programs can be found in the Action Plan, and program guidelines will be published on the program website.

Comment: #037_10-17-18_César Irizarry

“My name is César Irizarry, of the Corcovada Community in Añasco. The reason for my presentation today is that we in the Corcovada community, a community that is pretty far away from the town of Añasco, are located between the town of Moca, Las Marías, San Sebastián and Añasco, and we are part of Añasco. During the hurricane, our community didn't have any electrical power service for about five months, one week short of the five months. Thankfully, we are a community that has... We've had aqueducts for about 50 years and thankfully, said aqueducts are working and we have it running with batteries, and it was available for the adjacent communities. In the last 25 years, we've never spent more than one day without water, and now we have it working with batteries and all that. After the hurricane, and after seeing the problems we have, spending five months without any electricity, I... We, due to the aqueduct, because we were... They called us to visit the University of Arizona and we were presenting...” [INTERRUPTION IN THE RECORDING]

PRDOH Response: PRDOH appreciates the attendance to the meeting and input from the community of Añasco. These comments help inform program design needs at the local level. The challenges you are describing appear to be aligned with multiple potential avenues, including the Community Energy and Water Resilience Installations program, the City Revitalization Program or the Critical Infrastructure Resilience program. Further information about these programs can be found in the Action Plan, and program guidelines describing the application process and eligibility requirements will be published on the program website.

Comment: #038_10-17-18_Anonymous 1

“We also have some groups, almost always there's white and black, and then we are left with a gray threshold. And in this situation with all the assignments and the twenty-something projects that will take place, which was done by a full group of people who invested thousands and thousands of dollars, we, the community groups, have to work with two people, three people and with a budget that is voluntary. Then we want to know if you have contemplated any projects for people that are not located inside the guidelines because a lot of times things are gray because some people don't qualify for “X” or “Y” reason, or because it wasn't contemplated, or maybe because at that time they don't qualify for this, but you have an extra amount of money destined to create other new projects, because, as you said, things are not written in stone. And all the help we'll bring here is for that, so that we can contribute to the discussion, because that money is still in a draft but it's almost on the other side and we hope that's how it is. We have community coalitions.

I understand that, when we work in community coalitions, we can help. In my case, I'm from Moca, and those committees can help the Mayor so there is no duplicity of some... let's say, of what we want to accomplish. If a bridge falls down here in the Isleta neighborhood, that affects me because I have to go to Mayagüez to a clinic, and I'm from the Voladoras neighborhood. But also, if a road affects an area in Capá, in the 111, that affects me when I go to the market in San Sebastián. Then we're trying to see it as a complement, not individually, so that these coalitions can give a safer supply of what we're really after, because the idea is to include, not to exclude.

And when we're all included in the discussion, we can work faster. At the same time, we can see who were left out. I appreciate the opportunity, we're on time now. We will make an amendment to... What is an annex to this presentation, so we can give it to you. And I take your word that even cats can go to your office. I hope I can come inside when I knock on the door as well.

PRDOH Response: PRDOH is appreciative of the attendance and input provided by community coalition members and stakeholder groups and values a strong and collaborative working relationship. The input provided is helpful as we further develop program design. Community groups and non-profit groups will have multiple avenues to be involved in the recovery process, and these include programs. The challenges described above are relevant to the Whole Community Resilience Planning program and City Revitalization Program, which are described in the Action Plan, and program guidelines describing application and eligibility requirements will be published on the program website following HUD approval.

Comment: #039_10-17-18_Wenceslao Quintana

“My name, for the record, is Wenceslao Quintana Valentín, and I work for the Public Housing Administration. In addition, in my free time, I am... I direct a foundation called Comité Pro Ayuda al Más Necesitado, which is incorporated and registered in the department, and fulfills all regulations demanded by the government. A lot of people have approached me after receiving some money from FEMA to be able to build or improve their house, but the money provided by FEMA hasn't been enough to finish their house. I want to be a spokesperson and carry the message, to see how we can guide these people, if there's any money, apart from the money they received from FEMA. So, for example, if FEMA gave them 15,000 dollars and it would take another 10,000 dollars to finish the house, we would have to see if there is a way for said person to get that money through the Department of Housing and for that money to not be incurred in additional expenses if possible.

That's one. On the other hand, I also want to know, there are some people who have lost houses and these houses don't fulfill with... They don't have deeds, they don't have any documents, and there is a way that, sometimes the people go, ask for help and, since they have no documents, they practically leave with nothing and have no way of receiving help because the house doesn't fill the requirements or has no deeds, it has nothing. And that's a different point, although someone told me that something can be done, but I want, for my benefit and for the benefit of the people here, to maybe guide us... Those who are here, part of those who are here, it may also be of interest to help many other people.”

PRDOH Response: PRDOH appreciates the attendance to the public meeting and input provided. Within the Action Plan a number of programs will be applicable to the needs you have highlighted, for both residents and for greater community needs. The Title Clearance Program, Home Repair, Reconstruction, and Relocation Program, and Multifamily Reconstruction, Repair and Resilience Program are some of the flagship programs aimed at addressing housing needs and ownership issues aligned with what you have described.

Further information on these programs can be found in the Action Plan and program guidelines describing application and eligibility requirements will be published on the program website following HUD approval.

Comment: #040_10-17-18_Anonymous 2

“Regarding the abandoned houses. The apartment buildings. Do they qualify for that? Yes, my question is basically to know when the citizens can go to the Department of Housing to start opening a case.”

PRDOH Response: PRDOH appreciates the input of community members. With respect to abandoned or blighted properties, either for clearance and demolition or for rehabilitation, the City Revitalization Program or the Multifamily Reconstruction, Repair and Resilience Program are some of the flagship programs aimed at addressing the issues described. Further information on these programs can be found in the Action Plan and program guidelines describing application and eligibility requirements will be published on the program website following HUD approval.

Comment: #041_10-17-18_Anonymous 3

“I'm from Toa Baja. What came to mind is, according to what I've heard, banks in Puerto Rico have an inventory of abandoned houses that haven't been sold. These houses, do they also qualify?”

PRDOH Response: Thank you for this comment. Abandoned properties may have the ability to be addressed through multiple avenues. With respect to abandoned or blighted properties, either for clearance and demolition or for rehabilitation, the City Revitalization Program or the Multifamily Reconstruction, Repair and Resilience Program are some of the flagship programs aimed at addressing the issues described. Further information on these programs can be found in the Action Plan and program guidelines describing application and eligibility requirements will be published on the program website following HUD approval.

Comment: #042_10-17-18_Carlos López Bonilla

“My question is in regards to an experience we've had. With all of these projects being built all over the country, which will be thousands and thousands of projects, we are also prepared for the amount of material we'll be asking, demanding, to be supplied, so that we can build in the times we need, right? Because every project is going to have a timeline and we'll get limits to accomplish those projects.

We've had the experience that we'll... We sent for something at the hardware store and it says, well, that it will take two months to get to Rincon. Two months. I mean, what time... I mean, do we have the material in the country to rebuild the country on time? And another thing that I think... Well, I think they've talked about that too, but I would also like to know about the permits.

Because that's another problem. To work at some... You need permits and there are also other time constraints..."

PRDOH Response: Thank you for your comment and for your attendance to the public meeting. PRDOH has considered your input in the development of programs. Supply chain of materials as well as labor are things being considered, so your point is well taken. With respect to permits, PRDOH has been collaborating closely with COR3 and OGPe to streamline this process.

Comment: #043_10-17-18_José Avilés

"I approached the director of our consortium because I think that, through consortiums, we can facilitate and accelerate the training for employees and carpenters. I mention this because I did it in writing to our area director and he is the president of the Board of Mayors, because maybe with the help of the Department of Housing, its urgency would be understood. Training personnel could facilitate things in the consortium areas in Puerto Rico."

PRDOH Response: Thank you for your attendance to the public meeting and providing your input to PRDOH. The Workforce Development Program under the economic recovery programs in the Action Plan is aligned with the issue you have presented. Further information on this program can be found in the Action Plan and program guidelines describing application and eligibility requirements will be published on the program website following HUD approval.

Comment: #044_10-17-18_José Ramón Pérez

"I also work for the Department of Housing. I congratulate you for your initiative to give social help to the citizens of Puerto Rico, and I also agree with you because there is a lot of cement being used in Puerto Rico. The ecological and agricultural damage is pretty serious, and I'm one of those who thinks that we need to get housing but not by using so much cement in our soil. My concern was, the question is whether a person who is acquiring his or her new house for the first time would qualify, or someone who wasn't affected by the hurricane, by the damage caused by hurricane Irma and Maria."

PRDOH Response: Thank you for sharing your comments and for attending the public meeting. PRDOH recognizes the challenges you have referenced around environment and agriculture and there are various relevant initiatives in the Action Plan such as Re-Grow PR Urban-Rural Agriculture and the City Revitalization Program which has green components and green infrastructure options. With respect to housing, the Home Repair, Reconstruction, and Relocation Program will provide more information on this topic. Further information on these programs can be found in the Action Plan and program guidelines describing application and eligibility requirements will be published on the program website following HUD approval.

Comment: #045_10-17-18_Anonymous 4

“With the dynamic, a lot of questions always come up and for you to not get bored. In the same line as the mayor, we were talking about training. A lot of people in Puerto Rico need jobs here. Many times, we don't know where to address those efforts. A lot of things can be discussed here. For example, to build constructions with the magnitude of what is going to be done in Puerto Rico, we need specialized labor and other non-specialized labor in the consortiums because they have certain limitations. Will private companies such as universities or teaching centers be included to train people? Was that contemplated in the program?”

PRDOH Response: Thank you for your attendance to the public meeting and providing your input. PRDOH understands the need for increasing workforce development opportunities through the recovery and within recovery programs. The Workforce Development Program under the economic recovery programs in the Action Plan is aligned with the issue you have presented. Further information on this program can be found in the Action Plan and program guidelines describing application and eligibility requirements will be published on the program website following HUD approval.

Comment: #046_10-17-18_Luisa Seijo Maldonado

“I'm Prof. Seijo Maldonado, from the University Institute for the Development of Communities in the University Facilities of Mayagüez and the Siempre Vivas Project. I'll be having five minutes, right?, but that doesn't allow to do much. I want to talk about three important issues. One is participation, because the participation of the community and the different groups in the civil society is not as clear in terms of participation in the decision making processes addressed at the transformation and recovery of the country. We are working with over 45 communities and there are several needs and challenges that have to do with housing infrastructure, road infrastructure, and that also have to do with the basic and essential services for populations as vulnerable as the elderly and children.

So, I think that the document should include a mechanism of citizen participation that goes from the base to the neighborhoods. Therefore, we propose to use the methodology of community assemblies, to take place in the corresponding communities, and on the other hand, to use the existing associations in Puerto Rico as a support mechanism for this type organizations and initiatives. In Puerto Rico, in the Metropolitan Area, there is a group called CEDICE, which has been very active and coordinates a series of initiatives. On the other hand, there are also “bona fide” farmers associations and agroecology groups that have been organized as well. There are also community groups in the area, right? They are organized in our area, but at a national level, there is a coalition of community leaders. It seems that these organizations are going to be fundamental in participation.

In terms of participation models, we work with a community-based participation model with university students, and I put at the plan's disposal the collaboration of students, not only of the Mayagüez facilities, but also of the University of Puerto Rico, the Río Piedras facilities, the Department of Psychology, the Department of Cooperativism, which are the departments that

have been working with community-based groups. Also, these students visit people and collect information. We have information collected after hurricane Maria during those home visits and then we have an assembly. So, I recommend that, to work with real participation, it is necessary to retake that concept of community assemblies where the university can help and with other leaders and religious groups as well, faith-based organizations, which are an important instrument. Then, we need to organize as a municipality to go neighborhood by neighborhood, area by area, so that there is participation and we can collect information regarding their needs. Right?

The plan shows that some needs are being collected, but those who work directly in the communities can see that some needs are not included, right? Right? I'm worried, above all, about the elderly population. We have a lot of old people who need to rebuild their homes, that need service centers and healthcare, recreational facilities, physical therapy areas and occupational therapy areas. I think that, if the focus is the recovery, we need to take that recovery to the closest groups. I think this issue is very important. Another thing I believe is important is approaching women. The plan doesn't evidence the participation of women and services for women. In Puerto Rico, women represent over 52% of the population and right now, we have families, people, families with only one... One person, right?, in charge, most of them women. So, if we want to incorporate women in the economic development of the country, we need to guarantee services for the women's children. So, this is a very important issue.

On the other hand, we can also help from the university. One time, we worked in a project called CODIN, which included women from communities who were training to be caregivers with social workers and educators, who coordinated the services and provided, right?, the participation of women in the community. On the other hand, other women in the community and families in the community were incorporating into paid work, right?, all through training. And that's where I see the coordination of the initiatives of the Department of Labor, the initiatives that the university can have with the Department of Family and the other area that I think is important is technology. I think that there has to be an articulation of technology centers, right? Like this center here, but it is in the town of Moca, so how can we think about this center to get from Las Indieras in Maricao, right?, to Bucarabones in Las Marías. I mean, how can we really use this and have these resources available in the recovery process, joining efforts with the universities, the government, community-based groups, municipal governments, faith-based organization, really articulating a plan to make technology available because technology is what will guarantee education and information for people, and to help them make decisions from a human rights and constitutional framework in our country, and now it's been five minutes. I almost didn't take any breaks to rest. I had other things to talk about, but I will submit them in writing."

PRDOH Response: Thank you for your comments and for attending the meeting. PRDOH values the role of community groups and the importance of civil society and civic engagement in the recovery process, and so thank you for stepping forward in this way to highlight this at the meeting. A number of programs speak to the issues you have identified with regards to the role of community input and participation of NGOs and non-profits, such as Whole Community Resilience Planning and the City Revitalization Program. Further, among the portfolio of DV programs there are opportunities to provide a focus on the

elderly, such as the Multifamily Reconstruction, Repair & Resilience Program and the Community Energy and Water Resilience Installations program. Further information on these programs can be found in the Action Plan and program guidelines describing application and eligibility requirements will be published on the program website following HUD approval. Program implementation will be conducted in a manner which will not cause discrimination on the basis of age, race, color, religion, sex, disability, familial status, or national origin.



GUAYAMA

Comment: #047_10-15-18_Rafael Surillo (Mayor of the municipality of Yabucoa)

“Past March, we participated in the first public hearings that took place in the city of Caguas, where we submitted our five priority projects for the municipality of Yabucoa, as part of the recovery of the municipality before the passage of hurricane Maria through our island. In July, the Department of Housing published the action plan for the CDBG-DR funds, which we read and expressed as part of the comments process in it. In August, 2008, it was requested that we completed the Municipality Capacity Assessment as part of the evaluation process of the Department of Housing, to be able to identify the municipalities that have the human resources and abilities to handle the CDBG-DR funds. In the municipality of Yabucoa, we have accomplished and participated in everything requested by the Department of Housing in the planning process.

Now, once again, we came to show our commitment to the Department and the citizens of Yabucoa, who, one year after the hurricane, continue suffering the damages caused by it. In our municipality, we're ready to administrate the funds we will request through the proposal we'll submit to the Department as soon as the request announcements are published. However, after having reviewed the amendment, we continue seeing that the Department is in the wrong position and it's not considering reserving part of these funds and assign them proportionally to each municipality in Puerto Rico so that the mayors can hold public hearings in our own municipalities and so we can address the needs of the citizens who visit us every day in a faster manner. One year after the hurricane, those citizens still can't see their needs met due to the lack of economic help because processes are more bureaucratic and slower every day.

The municipalities in Puerto Rico are prepared to finally directly assist our citizens in a faster and cheaper manner, complying with the local and federal laws. Our department of federal programs has been reinforced with trained personnel that is committed to help the citizens and perform the administrative processes as required by the Federal Registry and the Federal Department of Housing. In our presentation, we request the Secretary to consider assigning part of the funds directly to the municipalities in Puerto Rico because we were all affected by the destruction. During twelve months, we've been the ones who have solved most of the situations we are facing with our citizens after hurricanes Irma and Maria. We are the ones who know our communities the best. Because of this, we request that part of the funds are assigned proportionally to each municipality so that each can provide economic help faster, cheaper and more efficiently. That's what we've done before with federal CDBG-DR federal funds in our island.

When assigning more responsibility to the municipalities of Puerto Rico, we can speed up the activation of these funds immediately in our economy, which needs it so much. We are in the best disposition to help the Puerto Rico Department of Housing to administrate the CDBG-DR funds in a fast and effective manner for our people and for Puerto Rico to finally be able to overcome the devastation caused by the natural phenomena. Past September 19th, 2017, the municipality of Yabucoa suffered due to hurricane Maria, the most devastating event in the history of the island, and the biggest disaster in the American jurisdiction. The hurricane entered our land through our municipality, bringing winds with a strength of 155 miles and bursts of wind of 200 miles. It hit

extremely hard for long hours, causing a lot of catastrophic damage. In addition to this, the National Meteorology system certified the passage of three tornados over the town of Yabucoa.

We estimate that 90% of the municipal structures were affected and some, according to engineering studies, such as the Félix Millán stadium, the Public Works area, the municipal police station and the mayor's house will need to be demolished. After having performed a census of the damages, we estimate that over 3,000 houses were affected by the wind. And that's our biggest concern. The need for decent housing and quality of life for residents who suffered large losses and who haven't been qualified by FEMA for whatever reason.

For this purpose, the municipality of Yabucoa proposes the following projects for its path to recovery before this disaster. They fulfill the national objectives of the Community Block Development Grant - Disaster Recovery Program. Summarizing it, the relocation of the fishing community in El Negro, the acquisition and rehabilitation of structures not being used and public nuisances. This activity would approve the existing structure and would repopulate the adjacent urban centers and communities. The support incentive for the homebuyer to acquire social interest houses, an investment that would be recoverable through financing.

Housing rehabilitation programs for people with titles. The municipality of Yabucoa proposes building an urban shelter, a structure with multiple floors in 2.5 acres of land in the urban center of the town of Yabucoa. The construction of the sanitary sewage system that has already been started in the Ingenio area, the community, in the Aguacate neighborhood. An emergency center in the town of Yabucoa, because we already lost the municipal shelter in the town of Yabucoa. The acquisition and installation of renewable energy systems in community wells and their pumping systems. The municipal cemetery is almost at the end of its useful life. The rate of mortality after hurricane Maria dramatically raised, which made the situation even worse. We propose acquiring land and building a new municipal cemetery.

Economic development projects, which are important to help the town of Yabucoa, such as the construction of a breakwater, the renovation of the wire staked in the port, the construction of the Teacher Plaza, and the improvements of the municipal pool are some of the events addressed at lifting the fragile economy in our town. Channeling of streams that would prevent recurring flooding and loss of houses in susceptible areas. Our prior experience with the CDBG-DR funds and the annual performance with the CDBG funds allow us to face this new challenge, and therefore, we request the administration of these funds. Thank you. I am sure that, with the help of God, we will be able to help Puerto Rico and our little piece of heaven, which we call Yabucoa, to recover."

PRDOH Response: Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Programs outlined in the Action Plan are not geographically restricted within Puerto Rico, residents of Yabucoa may be eligible to receive assistance.

Comment #048_10-15-18_Nancy Gutiérrez Rosario (Mayor of the municipality of Maunabo)

"I live in the Emajagua neighborhood, Parcelas Mariani in Maunabo, number 471. Hurricane Maria is the worst natural disaster that has affected Puerto Rico, and which hit on September 20th, 2017 with winds going at about 175 miles per hour. That peak of intensity was reached at Maunabo and Yabucoa, because it was in those two towns that the hurricane touched the ground in Puerto Rico. There were catastrophic damages in the southeast of the Caribbean, which were category 5, and a big number of tornados were registered.

The reconstruction must be performed to address structural weaknesses emphasizing on people who are sixty years old or more, who are incapacitated, regardless of their Social Security or retirement income. That their income is not an obstacle for the improvement of their housing and public security or health. Emphasizing areas that were most badly damaged where, up until now, a year later, no help has been offered. Ideas, "neighborhood watch", protecting the community.

Any type of suspicious activity must be identified in order to assist those who are the most vulnerable, the elderly or people who are alone. To create a community directive. Safety, building sidewalks with access for disabled individuals with ramps and signs, where pedestrian can use them. As a matter of fact, the priorities are electricity, water, safety, fences to protect homes and "hydrants" such as water pumps, ditches and lighting, because we need more lighting.

Also, the funds for repairs should be distributed through a card to buy material and construction supplies under one of the companies recognized in the United States and in Puerto Rico like a company recognized in the United States whose name I don't wish to mention but that starts with "home". It is important to keep citizens informed of our social networks, radio and television, and of each cent used in these CDBG-DR funds in 2018. Thank you for your attention. And well, these words should be considered mostly for elderly people without impediments, who have younger children, and the communities should be informed with the neighbors, right? So that we can help each other because surveillance is more important if we all take care of each other. In addition to this, I want to thank you, see?, because you've given us the opportunity to express ourselves. And, simply, the neighborhood watch is very important to protect the community."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #049_10-15-18_Enrique Rodríguez (Aguas para Todos)

"My name is Enrique Rodriguez and I come before you representing the company in consortium with Aguas para Todos, Inc., which is an organization founded in 2006 to build drinking water facilities in the municipalities of Guayama, Arroyo and Patillas. I'm honored to be presiding the consortium, and we are comprised of 13 housing developers who took the task of organizing this consortium to build a 24" pipe that bring water from the Patillas lake to the Guayama water treatment plant, and once the water has been processed, it is distributed to the different

municipalities of Guayama, Arroyo and Patillas. In addition to the piping, we also have a tank with a capacity of 7-million gallons, which is located in the Ancones neighborhood in Arroyo. The total cost for the project is 14.5 million dollars, for which the 13 developers who comprise the consortium obtained a loan from the Popular Bank to build the project.

The reason for the project is that, during five years, before the consortium was organized, the towns of Arroyo, Guayama and Patillas needed drinking water because the Guayama aqueduct or the water treatment plan was detained and no housing could be built or authorized because there wasn't enough drinking water to cover the needs. Once we built the project, which ended in 2009 under the administration of the Fortuño Governor, and which was transferred to the Department of Aqueducts, to the Authority, sorry, of Aqueducts, and nowadays, the Authority of Aqueducts is providing water to the three municipalities, Guayama, Arroyo and Patillas, thanks to that facility we built. The project was really a... The promoting agency was the Department of Housing and thanks to them, we received all the help to make it happen.

In addition to the consortium, because I'm a developer and I have a meaningful project in the Branderi neighborhood in Guayama, where we are developing 176 acres and we'll build on 800 houses, in addition to a 200-room hotel with all its facilities and medical facilities that will also be part of said project. My concern and the reason why I'm here is that, even with all the effort we've made and the help we've received from some government agencies, mainly the Department of Housing, we still find, we are find, and when I say "we", I'm talking about me and the members of the consortium, a certain lack of cooperation from some government agencies, mainly the Department of Agriculture. Even though all of us who are part of the consortium, the thirteen developers, for a period of six to seven years, were starting processes to accomplishing the changes in zoning that made the project viable or different projects of ours, because the past administration, with the change of plan in the use of land, took the zoning that many of the developers had and that would have allowed to build the houses.

Nowadays, we're fighting against them so that the zoning that we all had when the consortium finished its work can be recognized, and so that we can recover the investment we made of about 14 million dollars that today, none of us has received to recover our investment. We are waiting for some contribution credits that the government will grant to us, and the Department of Housing has helped us a lot. We have already submitted all of the documentation... But really, as I said before, our biggest concern is that we would like that now, through this need for housing in the areas, we could receive from the Department of... Of the Planning Board, the help we need to obtain the recognition of the zoning we had before or before the past administration, which made the development of the communities viable."

PRDOH Response: Thank you for your comment. PRDOH appreciates the input and has taken this into consideration.

Comment: #050_10-15-18_Rosa Estrada

"As a citizen, I'm here to only ask a few questions. I'm representing the Costa Azul Urbanization of Guayama, which is where I live, because I had a few losses after hurricane Maria. I don't know

where to go because everywhere I've gone, they have refused to help me. My question is: where can I go now? Okay.

Let me explain a little, because you might not have understood what I was trying to say. I went to FEMA and FEMA refused to help me, saying I was ineligible. They then sent me to federal loans but I didn't get any either. Then I went and talked to golden roof and I was surprised because I didn't qualify for help because I still owe my house. That's what they said. Well, now I appealed at FEMA and haven't gotten an answer yet. And well, I suffered losses because part of my balcony fell off, because I had a curtain and I know that doesn't pay for it... FEMA doesn't pay for it either, and no one pays for it, but I had it not as a luxury, but as a need.

I don't have it now, and every time it rains, all of the water comes inside, gets into the house and comes on the canopy's side. And I have to remove the water every time it rains. The same thing happened to the back because it was zinc, and the wind knocked down everything. Well, I've lined up all of that because I can't put anything there. Every time it rains, it all gets wet. What I need is help. I need some help to reconstruct, and I reconstruct, as you say, I must do it for the future, not for something... I mean, I don't want to put a curtain up again, because the same time will happen if another hurricane hits. But then I thought how it was... I read the newspapers, read about the program, but now I see that the program won't be sent to the municipalities, but rather to the program. As I understand, it's to the Department of Housing that we need to go. My question is, can I request help for reconstruction from the Department of Housing? Also, I still owe money on the house. Okay. And the people who have no internet, will that be said in the newspapers, television and programs? Because I don't have internet access.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. Outreach efforts for this program will not be limited to the internet.

Comment: #051_10-15-18_María Vázquez

“I come from the same community here in Guayama. Well, after the hurricane, my community was affected as well. We are concerned in our community because the only access road for our community is the bridge located on road 7748, kilometer 0.7 of our community. The residents are really worried due to the bad state of the road and how dangerous that is for our residents. Safeguarding lives is our... for our residents, we ask action, to prioritize the construction of a new bridge in our community, and I repeat the address, road 7748, kilometer 0.7 in Caimital Bajo. We acknowledge that it has been submitted to FEMA so that funds can be assigned, but we can't continue waiting for a disaster to occur because all of the community uses that bridge, which is now our only access road.”

PRDOH Response: Infrastructure projects may be eligible for assistance under the FEMA Coordination, Critical Infrastructure Resilience or City Revitalization programs. Thank you for commenting on behalf of your community.

Comment: #052_10-15-18_Susana Duprey

"Well, I am here as a resident of Barriada Olimpo, asking for help because my house is completely destroyed by the occurrence of the two storms, asking for this help, because FEMA helped me in a certain moment when I lost a lot of things of the house, but it was not to build and help my home, but to buy clothes, towels and other things that I lost, because there is a completely destroyed room in the house. Right now, my house is flooded, there is a lot of water in that room. Then I spoke to FEMA, but they cannot help me to get a loan because I make very little of my Social Security; since I am a widow, I have no help from other resources, and at this time my health conditions are not the best, and I feel affected by my home because I have nowhere else to go, I have to live there with God's help, and I hope you can help me."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #053_10-15-18_José Luis González

"I, Jose Luis Gonzalez, have my consulting office here in Guayama, and I come on behalf of a project that has been presented to the municipality, and has the endorsement of the Honorable Mayor Eduardo Cintron, and part of this project, is located on highway number 3, el sector Puente de Jobos, this is a continuation of the Valles de Guamani project. We are offering ... as part of the housing supply program of the municipality, a project of 145 homes, will be located, as I said, in front of highway number 3, adjacent to what we know as the industry Alpha Caribbean.

This is a private project, from private funds, it is a private property, that is, we as developers have the money available to develop the project, and in fact, we have already begun the process of advancing the permission. We already have the endorsements of the main agencies. Having said this, since the Electric Power Authority, the Aqueduct Authority, the same telecommunications company, we have these endorsements already advanced. We have the project designed and we have begun to complete the permission process to begin the project. In other words, this is a project, as I said, with private funds, that we are going to develop in the town of Guayama. We have presented it to our honorable mayor, and he, through written communication, has endorsed the project. What are we looking for this morning?

Well, to present as part of the housing offer to the sector of Guayama, the Valle de Guamani project, that's what it's called, it is in a property, Finca Adela, which has already developed Valles de Guamani, Phase I, in the back of the highway PR3, this is the same property, a remnant that we had in front of the number three. Among other attractions of this project, we have or have

proposed to present a Project where all housing units will be connected to a solar microgrid. We are proposing that part of the project, we will dedicate a plot of land to create a miniplant, a solar microplant, which we already have the preliminary designs of the same, and we have the technology to do this.

For that reason, I understand that it is one more attraction to the housing communities in Puerto Rico and this is already tested in other places of the world, that is to say, it is not the first microcells project, which is useful for a community. This part of the microcells is going to be operated and maintained by a private entity as well, although we will always be in communication with the Authority as part of the program and the requirements of the regulation.

As I said, we want to come in as part of the funds for investment recovery, because the investment is going to be made and we do not have to wait for funds to be allocated to us, but we want to recover the invested funds, to be competitive, and then to share the funds. That is the purpose of my presentation this morning. The cost of the units is a cost that will be within the parameters of social interest. Those parameters, I understand, are between ninety and one hundred and ten per unit. They are high quality units, they are going to have, approximately, between 900 to 1,100 square feet, that is to say, these units... they are going to be designed by our architects and it is going to be a good project, well competent, well..."

PRDOH Response: Information regarding how to apply for the Social Interest Housing program will be published as part of program guidelines, when available.

Comment: #054_10-15-18_Ruth Santiago

"I work with social, environmental, and community groups in this region of Salinas and Guayama, and for many years we have been working on the issues facing the communities here in Salinas and Guayama, particularly the issue of pollution from the generation of energy from burning fossil fuels. Here in this region of Guayama we have the Aguirre generator complex, which is the largest source of pollution in Puerto Rico in terms of toxic emissions, and is the largest generation unit in the country. We also have, you all know, what is called Applied Energy Systems, AES, the coal-fired power plant, which has violated many provisions of the law, including discharging polluted water into Jobos Bay here, on which coastal communities depend and tourist trade depends, is it not? The restaurants.

There are studies that show that there is mercury in the tissue of marine organisms in the bay. And basically this area is the focus of energy generation based on fossil fuels. And as organizations, we have a proposal, right? In relation to this type of generation that has to do with the creation of solar communities. I think I point out that the acoustics here make it difficult for me to participate, I don't know if you can lower the sound, because it rumbles. Okay. Yes.

In view of the situation faced by this region of energy generation, the country's focus for energy generation based on the burning of fossil fuels and as a result of Hurricane Maria, and the way in which they were affected, at least 80-85% of the transmission lines that leave here from the southeast, and that go to Aguas Buenas and then to the Metro area, basically what is happening is that this region supplies a large part of the energy of the metro area, right? the way the electric system was built in Puerto Rico, the big plants are in the southeast and also some in the

southwest, and a lot of that energy, 70-75% is to supply energy to the Metro area. And the proposal that we have for the reasons... I told you briefly, did not I? but there are many, many reasons to make this change, is the creation of solar communities.

Obviously, the transmission system, we all know, every day we see the news, the information that there is a weakness, right? on those transmission lines, we have seen on April 18th, ... well, twice in April, about a month ago too, a breakdown, and we are confronting, right? situations of instability in relation to the energy supply, and what we are proposing is the solar communities, which means that the communities themselves can be the generators and consumers, right? what they call energy prosumers, using what they call the Mayaguez law school, sorry, the Mayaguez UPR roof resource, right? that is, the installation of photovoltaic systems on the roofs of the different communities, so that energy can be generated more clean, and close to the place of consumption, and at the level of the whole island.

The time is running out, I have much more to say, in fact, we submitted written comments from El Puente, one of the organizations I work with at the island level, but we need, for example, programs like Tu Hogar Renace to attend, we have seen that they are not attending structural repairs to the roofs and that is necessary to be able to then give way to the solar communities that is, as I indicated providing photovoltaic systems on roofs, and obviously, prior to that, a whole process of education, so that people understand well some of the differences in relation to the use of renewable energy, that there are also energy efficiency programs in homes. That is, equipment that consumes less energy, such as refrigerators, there are, LED lighting, and so on. In other words, so that it can be changed, right? and that we know that at least three thousand lives were lost as a result of the hurricane, perhaps more, depending on the study you look at, and a large part of that was due to a lack of electricity, for medical equipment, respiratory equipment, etc.

Let me add one more thing. And I understand that for the purpose of the region, it's like a legal procedure, that you should choose a more central place to hold these meetings, because it's a little bit difficult for people who come, especially today that people come from Ponce to here, because here there are public structures available to make, right? views in a place that is much more accessible to the whole region and all the people who are appearing. We would also like to point out that...I have a proposal, we want solpr.org, for you to see the proposal for more detail... And there is a disproportion in terms of investment for renewable energy. You just indicated to me that there are, for example, 400 million, you told me, but the contracts for fossil energy are for billions that are being awarded."

PRDOH Response: PRDOH agrees that sustainable, renewable energy is important and has designed the Community Energy and Water Resilience Installations program with that in mind. Public Hearings were held in seven locations across the island, and resulted in a wealth of information being shared.

Comment: #055_10-15-18_Elliot Salgado Cintron

"The reason is that I am representing my brother Luis A. Salgado Cintron, who at this moment is not here because of a work obligation. A year ago, the hurricane in my grandmother's house,

which is in the village, suffered damage, lost the roof, the house is made of cement and top of zinc, and everything inside collapsed. And a year ago my brother went to FEMA and they were denied several times, the petition was denied, and it was to the development of small businesses, it was also the same, it was denied everything that ... for ... the settlement of the house was denied by FEMA, to see what you can do, they are already a year living in my house, and he has a bit of depression."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #056_10-15-18_Victor Juan Bilbraut Cora

"I am a Municipal Legislator of the Municipality of Arroyo. At this moment, in my personal character I am representing the community of Barrio Yaurel de Arroyo, which consists of a few sectors such as Palmarejo, Sierrita, Hollywood, Santa Clara. This community is in the rural areas of our town and eternally has a water problem. I mean, in order to bring water to those people, to that community, we have to use three or four relay pumps to bring water to that community. What happens? When the electricity goes out, there is a huge water problem. The municipality takes its trucks when they are "ready" to supply the water.

So we are setting up a project to see how we can make an aqueduct so that the water then goes down by gravity and do not have to use pumping pumps to bring water to these people. And also, it has another electrical energy problem, and we are planning to request solar energy networks for that problem. The other reason is that we also have there in that community about 40 to 50 people who continue with the blue awnings. These people have gone to FEMA for help, they have not been provided with help because they do not have title to a property. I understand that there is legislation there that they are looking for, with a... solve that problem with an affidavit for those people.

So the lighting of Highway 753, which is the one that leads from the town of Arroyo to the rural area, that's a maze at night, there's no electricity there, there's no light, all that was taken away by Hurricane Maria, and since it was high crime rate, people limit themselves to going down to the town at night... referring to how we can... if you can give us an idea to see how we can assemble those solar energy networks for that community that, as I said, has more than 8,000 or 10,000 people living there."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

The Community Energy and Water Resilience Installations program aims to provide renewable sustainable energy, including solar power, to impacted residences and small businesses.

Comment: #057_10-15-18_Ildefonso Pensantes Ortiz:

"My name is Sergeant Ildefonso Pensantes Ortiz, ID Plate ..., I work for the Municipal Police of Guayama. I have been in the service for 33 years and I have a concern. I am representing all the municipal police on the island, including the Puerto Rico Police. Recently, the Honorable Governor was talking about some benefits that police officers are going to have in relation to their homes, buying homes or trying to pay off the current housing they have, is that correct?"

My concern is this: we, as municipal police of Puerto Rico, earn much less than a state police of Puerto Rico. And one of the very big concerns is that we have, many of us have debts with the banks, according to the purchase of a house, and that program would help us a lot in the way that since we earn less, we are doing a job that we are trying to help the Puerto Rico Police also in order to serve the citizens. My concern is if that program, when it mentions "police" includes municipal police. Within the (unintelligible) program, when that program is going to come into operation, I know that maybe there is not an exact date, but possibly a later date. Last question: Does the CDBG-DR 2018 program combine with any other federal aid, yes or no? Well, without further ado, I thank all of you on behalf of the Puerto Rico Police, municipal police, and first responders from Puerto Rico."

PRDOH Response: The Homebuyer Assistance program offers closing cost and down payment assistance for the purchase of a home. Information regarding how to apply for the program will be published as part of program guidelines after HUD approves the program.

Comment #058_10-15-18_Ramfis Peréz

"I must clarify that we are an organization of the sector, located in Ponce and in several municipalities of Puerto Rico. We are here this afternoon, as we were in past hearings, to present some projects of interest to the city of Ponce. The Anti-AIDS Organization, better known as Lucha y Afiliadas, has been developing housing for vulnerable populations in Puerto Rico for 25 years, such as the homeless, women survivors of domestic violence, the elderly, and we also provide drug abuse treatment. To date, we have developed a total of 494 housing units for these populations through various municipalities in Puerto Rico. In Ponce we have the Remanso de Paz project, which has been working for 10 years, and we have vast experience working with the Housing Finance Authority, with tax credits and Home funds. We are well recognized by the Federal Housing Department, HUD. We also participate in both CoCs, the continuous care of Puerto Rico, of which I am president of the Board of Directors of PR503, which covers the entire southern area of Puerto Rico, and I have been a member of PR502 also of the Board of Directors.

The proposed projects will be presented, as we did last time, through the website, but they are two rehabilitation projects, one of them would be done in the Jose Gautier Benitez School, a school that is currently abandoned. And the other one we propose to do it in the school... in other of the

schools in order to save the... you will soon be submitting all that to them with the proper addresses. The number of units in the first school would be about 60 housing units at an estimated cost of 15.5 million dollars, of which 40% would be covered, matched by tax credits of 4%, because they are rehabilitation structure. The other 60%, the 60% gap, we are proposing to cover with CDBG-DR funds. These units, the use of them, would be for elderly people who have suffered the loss of their housing units as a result of Hurricane Maria. We will be requesting the municipality of Ponce, autonomous from Ponce, the "project base" to be able to have the security of the operational income of that project.

We are also proposing another multifamily project, this is a multifamily project of 40 units, for people with limited economic resources, and where the vast majority may be relocated from flood areas or have become homeless as a result of Hurricane Maria. The proposed use funds will be the same as in the first project we proposed, the 4%, which as you know has not been used during the last few years, but this is a good opportunity to use these funds and leverage these CDBG-DR funds financially so that they yield more and more, for adequate projects are made, financially speaking. This project would have an estimated cost of 17 million, in the same way 40% used by contributory credits of 4% and 60% of the gap covered by CDBG-DR.

Finally, as you know, I believe that every Puerto Rican has suffered PTS, "post traumatic syndrome," as a result of Hurricane Maria and the most vulnerable in our country, the homeless, and many other people who are not necessarily homeless... have fallen into drug use and abuse. Our organization is fully licensed by the Department of Health and the DEA to provide this treatment, and we are proposing an expansion project of one that we already have for 500,000, in services."

PRDOH Response: Information regarding how to apply for the CDBG-DR Gap to Low Income Housing Tax Credit (LIHTC) program will be published as part of program guidelines, when available.

The Social Interest Housing program provides funding for the construction or rehabilitation of supportive housing for vulnerable populations, which may include victims of domestic violence or the homeless.

Comment: #059_10-15-18_Carmen Cosme

"My name is Carmen Cosme, I run and founded the organization One Stop Career Center, an organization that for 18 years has been dedicated to working with sensitive populations. This means populations and communities that have had problems with justice. The position of us here today is to seek, and provide, and offer, an alternative work for people who have had problems with justice, as a resource, since through the... after... after Hurricane Maria, Puerto Rico lost a lot of skilled labor for the development and rehabilitation of the communities. We, as collaborative agreements, not only with good correction, but with the Municipality of Ponce, which we thank the mayor for the opportunity she is giving us, want to use the workforce that comes out of these prisons, since the Ponce area is one of the areas where there are more prisons in Puerto Rico. These people go out and often become wanderers in the neighborhoods, communities and municipalities.

What we want with this is to give them the opportunity to train and guide them to be able to work in this rehabilitation of this city. The project aims to show and raise awareness of the current situation of the penitentiary group in relation to the work environment, which is what I spoke to them previously, showing what their needs are that make it difficult for them, in view of their integration into the labor market, to get out of prison. Therefore, working with them and being able to put them to work from within, give them some training and guide them, this is going to be safe for communities, neighborhoods and municipalities. We are going to work, we intend to work with the municipalities... or the Municipality of Ponce, which currently has limitations in the labor, housing and economic areas.

The aim is to develop light construction initiatives that will have a quick, effective impact on communities or areas, if selected, in collaborative efforts with the municipality. For this we have three stages of development. The first stage is to qualify the participants of the correctional system that will form an integral part of the workforce, which will be in charge of the improvement projects. In this way, we will promote the integration of employees who serve as elements of change and transformation in the areas we are going to intervene.

Second stage, to begin working with families in vulnerable and high-risk locations who understand why they should move for healthy and safe places. This through our HUD-certified case managers and counselors that we have in the organization, since we have a HUD-certified housing counseling agency. In the meantime, the municipalities would be identifying vacant lots, properties that are available, projects that were left unfinished, in order to do the rehabilitation, and make these families move into these new neighborhoods.

And as a third stage, larger projects, so that we can establish at the completion of several things, of reconstruction for communities, neighborhoods ... I love the word "neighborhoods," municipalities and Puerto Rico, the following: source of permanent employment, direct and indirect, community development, healthy housing, which are also important because there is still a lot of asbestos, right? in the communities; safe communities, because we have a workforce, which are the ones on the streets, and currently there are 500 communities that are going to be affected, they are very affected by the security problem where they have to be living, the economic stability for the municipality that we are going to impact through the funds."

PRDOH Response: Thank you for the proposal. The Workforce Training program outlined in the Action Plan provides job training for un- and underemployed residents. The Housing Counseling program provides wrap-around educational and support services to residents. Information regarding how to apply for these programs will be published as part of program guidelines, when available.

Comment: #060_10-15-18_Moises Cordero

"My name is Moises Cordero, I am an architect and we are working in collaboration with One Stop, with Carmen Cosme, who recently deposed. We have a firm of architects, and we are also collaborating with several contractors. We are basically the technical operational of One Stop for many of the initiatives that we could have in collaboration with the program or with the work plan that will be working in the south. We have already started some of the projects that we have

with some funds that we have received from different organizations, they are very simple improvements, but it has opened the doors for us to be able to start touching base with the different groups that can support us, that would be the base groups of the correctional institutions that we are recruiting, and at the same time we are being able to make a good integration with contractors of the area that can do some works of improvements.

We have started with a series of funds that are, as I mentioned privately, donations, the type of improvements cannot be very advanced, because they are... Many of the houses that we are handling have a high level of deterioration, which requires a permitting process, a series of documentation of all those damages, which we have even... we have begun to plan, we already have a series of formats that we are using with the houses that we are helping with the program, but we want to do... offer our services, and our knowledge that so far has been partial, and put it in the hands of the Municipality of Ponce, and other surrounding areas that we can collaborate and establish those work plans, obviously, looking at this other sector, right? that... giving employment opportunities to a series of people who can collaborate and who have even helped us a lot, the experience we have had has been very satisfactory.

We become participants, we want to collaborate with this, and we are going to be very close to One Stop collaborating in this kind of effort. I didn't bring a written paper, but soon we will be submitting one. Maybe we will expand a little more on the work we are doing. We have already impacted countless houses, that we already have photographs, and basically we have a very simple report, right? but that can be understood because basically the stages of intervention that Carmen Cosme mentioned to them, where we identify the work group that we are going to manage, and we also have the identification of the improvements that we are going to have with the participants, and then we program with different contractors, that basically we establish a logistics of prices, and we establish a logistics of how the cases are going to be handled, to then integrate the groups that we are going to have, basically, the participants of the sector of the youth and correctional institutions, with the different ones, even integrating participants, workers, of the same community, that is.... that is what becomes a little more complete, because then the integration that occurs in the community because, when you have ... open participation, there is more control, and at the same time there is more confidence in what is being done in each of the interventions."

PRDOH Response: Thank you for the proposal. The Workforce Training program outlined in the Action Plan provides job training for un- and underemployed residents. The Housing Counseling program provides wrap-around educational and support services to residents. Information regarding how to apply for these programs will be published as part of program guidelines, when available.

Comment: #061_10-15-18_Alberto Rivera Morales

"My purpose to be here, I am a Sergeant of the Municipal Police of Guayama, I have been in the same place for 31 years, and I thank the Governor of Puerto Rico, Honorable Ricardo Rossello, for including the municipal police in the aid that you are going to give, since we municipal police normally, when you make a legislation for aid in relation to the retirement, the problem that

public employees are going through with the retirement system, is always legislated in favor of the state police.

We, as municipal police, are always left behind by the situation that for all intents and purposes we pay Social Security. Social Security is paid, but the salary is much lower than that of the Puerto Rico Police. And in the case of Guayama, we are right now, I, in my case, have 31 years of service, but I only have 21 years in retirement. When I go to retire, the percentage that is going to be given to me is very low, I would have to wait until I the age of 62 or 65 years old to then catch up with the issue of Social Security, and this would be an immense help towards us, since acquiring an additional property, which can then, as the program says, rent, if I am right, it would be an additional income for us, since, when we retire, practically, we are going to be, indigents, because we are not going to have the necessary resources to maintain a family, pay for a medical plan and so on, until Social Security arrives, because once we have Social Security, then we have Medicare, but unfortunately in this country the Puerto Rico Police have always been considered first and foremost, and all legislation comes in favor of the Puerto Rico Police.

We do practically the same job. We risk our lives, as all the police in Puerto Rico do, and we have to look for this way to encourage all this type of program, including those municipal police officers that we leave every day... and we risk our lives on the street for our fellow citizens. We understand that it is a Project that would greatly benefit us as policemen, and it would be something that, I repeat, would be of great help when we retire. This is all that I have to say at the moment because I didn't come prepared, unfortunately, but that's what I wanted to express."

PRDOH Response: The Homebuyer Assistance program offers closing cost and down payment assistance for the purchase of a home. Information regarding how to apply for the program will be published as part of program guidelines after HUD approves the program.



FAJARDO

Comment: #062_10-19-18_Aníbal Meléndez: (Fajardo Mayor)

"The government of Puerto Rico has developed a storm recovery plan that defines how the country will respond to the urgent humanitarian needs of island residents while developing and implementing a transformative recovery, as well as generating long-term investment in social capital, strengthening the economy, and laying the foundation for stability and continuity of government modernization and efficiency for decades. Based on this synthesis, the Autonomous Municipal Government of Fajardo is interested in considering in the amendment to the action plan CDBG-DR a series of projects identified in the following main categories: number one, in housing.

Acquisition and rehabilitation of existing housing and construction of new housing. We all know the devastation caused by Hurricane Maria. We all know how a large part of the houses were destroyed. We all know how river overflows affected in different ways. However, we have found that with the beginning of the petitions that we make in each municipality, we have difficult situations such as property titles. Without making some assessments, it's position, already reject people. Change of flood change, this is a very serious problem, and I am going to bring my case in particular. I made an investment of eleven million dollars to take out Mansion del Sapo and Maternillo, you are a witness of that, ma'am, and we met with the Secretary, I am still waiting for those projects to take me out of the flood zone, and they are estimates that we are making approximately eleven million dollars to rehabilitate the area. So we can have the best intention, we can make investments, because in my case I invested eleven million to channel the river, we channel the river, and I am still waiting for the Corps of Engineers, if there is anyone from the Corps of Engineers listening, to have compassion on us.

Another project we are planning is the construction of a nursing home for a total of \$14 million, and the purpose is to provide safe housing for those older people. We all know about the exodus, the people of Puerto Rico are leaving, the young people are leaving the island, and we're running out of old ones. Therefore, we have to change the focus, I was in a meeting recently and they said to me, "Mayor, you have to stop building courts, you have to stop building ball parks, you have to stop building things for young people", you have to focus, you have to refocus on older people. And in those terms because we want to give quality of life, healthy quality of life to our elderly, and we are refocusing our housing development program. These nursing homes are recommended to be built in the city center in a way that promotes their rehabilitation and revitalization. Incidentally, we are considering the construction of a nursing home of one hundred apartments, practically in the center of the city, to revitalize the city center.

Incentive Program for Home Purchase and Payment of Pre-Owned Housing. We have estimated an investment of twenty million dollars to be able to offer individuals or families with low and moderate incomes the necessary funds to obtain a house that pays off. A house, because here we have the situation that with the repairs of the houses in floodable areas, what we do is put some patches and when the next storm comes we have the same situation. When Hugo arrived, I had only been here for eight months, and I'm leaving with Maria because I have to leave now. In other

words, that way... we have had from Hugo to this date, experience with six different hurricanes. In other words, practically, I have to confess that in my municipality a culture of hurricanes was created.

Every time there's a hurricane here, everyone knows what to do. In other words, you don't have to be running after the employees. And I'm surprised that the first people to get into sport pants and tennis are my secretaries and my clerks, and I thank God for having a staff that is committed to serving our people and who have grown up, as I said, in that culture of hurricanes. So I know that a lot of emphasis has been given to these investments to acquire a new home, to acquire or repair the one we have, and if this goes well, I believe that we are going to give a great service that in other hurricanes was not available to us mayors, to the availability of humble people, to the availability of those people who really need housing in adequate conditions so as not to have to keep repeating this situation year after year. This year the ceiling was gone, next year it will be two columns, and when you come to see, who is always solving and who is opening the budget drawer? the municipal governments with the limitations, here is a group of mayors that we know that every day the pocket of the municipal governments is tighter, but every day the demands are greater, and I am talking to them that I already go for 32 years in this position, and now I am telling the fellow mayors that the old man that every time arriving at San Juan, they say "Look, the old man arrived", and I say to them "No, the one that has the most seniority", which are two different things.

Yes, because every time I am addressed, look, this one too, is the greatest "seniority", always "the old man arrived, the old man arrived", because the old man is already leaving, so... but I want to leave with good points, and I want to leave leaving a better quality of life to live for our people because in the long run and in the end that's what people remember, that he was a great mayor, that you knew how to serve, so obviously, those who come after have a big responsibility because they have to do the same or they have to do better, and here I know that this government... either I always speak very well of the mayors, why? because as I said now when I said the greeting, we are the officials who are closest to the people.

In terms of infrastructure, you already know that when there are hurricanes, the repair of roads, municipal roads, the construction of sidewalks, creation of gutters and improvements to rain systems, that everybody has to put their hand in their pockets to take action in those particular areas, and this way you can make the best investments, but we have to be sure to comply with building codes, because there are many factors, perhaps one speaks here, but I can order to make a bridge, which was pulled up by the river, but that river in the next hurricane could come with more force than three previous hurricanes, and these are the situations that we usually have found in these hurricanes. And for the construction of... and rebuilding roads and stuff, I'm only asking for ten million dollars. I believe that with ten million I can do something, so that you take that number, and then we have the municipal facilities, which is another area, which concerns us directly.

Last week, I departed with my shipment to San Juan very excited, do you know why?, because they called me, they call me from FEMA "Mayor, come to San Juan that we have there a check for 20 million dollars that we will reimburse you for the contributions that we gave," that's why I said "I departed very excited with my shipment". Passing by Carolina, the cell phone rings and they

say "Mayor, it was a mistake", look, gentlemen, "It was a mistake", do you know what that is, a mistake of 20 million dollars. Well, look, what did I have to do? Turn back and wait for the call to be returned to see when those 20 million dollars are going to be given to me. And I mention this because it was money that I invested from the municipality, it wasn't that I went to look for easy money... it is a money that I had invested in that corner, in a corner, for when this emergency arose, and then the twenty million now I don't know when they are going to arrive. And I mention this because I know that the comrades mayors all, all of us, we have had that situation, that we have invested, we were told "Invest, that this time FEMA is going to contribute quickly", and I personally have to tell them that in my case in particular, and not knowing how it will happen to the other comrades, that the movement is too slow.

I have here... Like they say, the mayor over there. I have the regional office where people who have had losses go for help, and after "X" weeks or months, they reappear, where? at the mayor's office, because of the facilities that I gave to FEMA providing service with municipalities. So people understand that the mayor has a power over that. So I mention all this because these are situations that definitely at the end go to the door of the mayors.

Another project in which we have requested only 14 million dollars is the construction to improve access to the communities of Puerto Real Beach, the Maternillo Sector, Mansion del Sapo Sector, Beltran and Vieques en el Aire, an extension of Marcelito Gotay, which we started some time ago, we launched the bidding, we started the project, and to our surprise, the area appeared to be as a "wet land", which entails a lot of regulations to turn an area that is not a "wet land" into a "wet land" area, this would come out in three or four million dollars, and it only went up to, so... and I have to find out how we can get solutions for those families that are affected by those areas that are flooded, since it is extremely difficult for them to cross the roads to their respective homes. So these areas have people that have to be moved to the so-called shelters. And what are our shelters? The school centers.

And when taking people to the shelters, they have to be there for three and four months; it's three and four months that the children are not attending school. In other words, this has other consequences. It's three or four months that the parents have to have the children in the house, and what happens? They tell me, "Listen, Mayor, the problem with this is that when I have my children for three or four months, I have to have that refrigerator full of sausage, full of food, full of soda, and every time they open it, ten or fifteen pesos are spent," and that's what the Puerto Rican family lives every day. You can only know this by dealing with people. And in an economy that is damaged and that is increasingly affected, you have to have an additional budget for the syrup, the Coca Cola, the sausage, the cheese, the sandwich, every day, with three or four boys, you know, these are situations that we are sometimes sharing, we are living together with our neighbors, we don't realize about it.

For funds we are also applying for economic development. Here you already know about the transfer, and with this I'm going to finish, from the beach port to Roosevelt Roads, which in fact, I see a very nice shot of how it looks, but we are already holding meetings with developers, and if there are developers here, note that you can visit us in confidence, that we have a lot of work and many projects. So I open the doors from now to see that this is a system that works. Well, that's where the communication of Vieques and Culebra has definitely moved for Ceiba, we have super

extraordinary facilities there, the developers who are here, if any, can go and we can sit down to talk about a project that according to estimates can reach fifty-five million. In other words, I think that's good, and it's interesting, and it's appealing for anyone who is dedicated to this type of project. We have some very nice plans there, we have to do a big reconstruction and coast on the dock, because it was undermined for so many years, you can imagine, but in the tourist area, in the area of the cays that are near Fajardo, there are the Virgin Islands, in other words, this is the ideal place to develop this type of project.

And to conclude, I'm going to tell you the experience I had with some friends, that I went to the old San Juan and they invited me to run the boat behind the hill, and I was very happy, very calm, I got into the boat, and you know what? Look, I was like minutes like this, holding of the boat, when I get out of the boat, I got out exhausted and tired and I said, "But come here, here I'm going to the Virgin Islands and I'm going forward, I'm going in the back seat, as if I were a millionaire, when I'm given a raid, and I'm going there for a while", that is, and I think these are the areas that need to be strengthened, these areas that give a good service to the tourists, and I beg your pardon for those who have a boat in San Juan, but you know, forgive me if someone has boats there, but getting on a boat in San Juan to have fun that is annoying, I say it with all honesty because you get off very disturbed. I don't think you're going to make signs to me anymore.

With this then I conclude... those things that are urgent for us. If you have noticed, here we are struggling with solving problems that are urgent for the community, that are urgent for our people, but we are also giving emphasis to solving those problems that are urgent for the municipality, because every morning, at six o'clock in the morning I go to the yard to pick up the newspaper, and it is necessary to see the economic situation that awaits us. To all the mayors, that I know they are very responsible people, very serious, very honest, this is going to get difficult, that's my area. Before becoming mayor, I was a professor at the university in the Department of Commercial Administration, that is, it is an area that I know very well, and all the projections that I have made in my almost 32 years that I have been there, have been good, very positive, and to this day they have been like that, from now on I see them like that."

PRDOH Response: Housing programs outlined in the Action Plan, including the Home Repair, Reconstruction or Relocation program and Homebuyer Assistance program are not geographically restricted within Puerto Rico. Residents of Fajardo may be eligible to receive assistance.

Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #063_10-19-18_Javier García: (Aguas Buenas Mayor)

"I, Javier Garcia Perez, serve as Mayor of the Municipality of Aguas Buenas.

In the first round of public hearings of the CDBG funds of 1.5 million, billions, we submitted five projects, which I list quickly, there were four projects aimed directly at housing, where we

proposed the project that would be the construction of eighty housing units in the urban center, the school ... old Josefa Pastrana School, that is a school that is closed and a property that has five acres of land, that would repopulate the urban center, and we would also do justice to our countrymen who don't have a safe house or who don't have the economic resources to have the same one. Following the order, we also submitted an order of support that would be the later part of the CDT of the Municipality of Aguas Buenas, the construction of housings in the spaces that we already did the demolition of housings of public disturbances, and we have available for the construction of housings in the same urban center, and those that we have identified. And the long-awaited bridge Las Charcas, that bridge that is falling by the passage of these two hurricanes, where it gives way to over two thousand families in the neighborhood Juan Asencio, and the Mulitas Neighborhood. This bridge is already designed, we have the studies, what is missing would be the construction works and do justice to these people.

In this new round of CDBG-DR 2018 funds, of these 8 thousand million, we continue to follow the state's priority regarding housing development. In our village, there are nearly 200 families who for ownership reasons have not been able to receive assistance for the repair of their homes. We maintain communities like Vistas de Jagueyes, with about 25 residences in a floodable area or wet area. On the other hand, the Municipality has about fifteen acres that are available, able for this type of development of housing of social interest. To this purpose, we request the amount of fifteen million for the development of a housing project of social interest that allows the relocation of these housing families ... so that they have safer homes and more suitable to face any atmospheric phenomenon. It is the main issue that we have in the communities, the housing project.

Second... in its second order, we are requesting in the area of infrastructure. Aguas Buenas is a town that is surrounded by some cities, it has five important entrances: the access adjacent to Guaynabo, Bayamon, Caguas, Comerio and Cidra. We are a town that is located in the mountainous center, and for that geographic area we have some big problems of landslides in the highways. After the passage of these two hurricanes, the highways of the town of Aguas Buenas have been totally destroyed, state highways and municipal highways, the roads; we have a great problem of water runoff, that has caused great landslides in our highways. This is how the Municipality is investing from its own general fund to repair all municipal and state roads, investing right now over 150,000 dollars in this very difficult economic moment in which we are living, and the Municipality already has to be doing its own work from the general fund to repair the roads. We are requesting to repair the highways, millions of dollars, and in addition, to clean up the landslides that we have, and take care of future landslides, and be able to mitigate an additional five million for the gabion walls. In that way, we would make some access roads, and we would have safer roads for the well-being of our families in Aguabon.

In addition, we would work in the infrastructure project too, we need the sewer construction project that comes from the Sumidero Neighborhood, which is the largest neighborhood our town has, to connect it to the urban center. That sewer system would solve the problems of the families of drains that run from highway 173, connecting to the highway 156 of the town. We have a host school there, which is elementary and intermediate, and we have to send twice a week, up to three times, the septic tank truck for emptying that school, otherwise classes are interrupted, also, the businesses that are all along that road, are all facing right now problems ... the Environmental

Quality Board, which say they need to be new septic tanks...is demanding underground injection. If you work and achieve this project, we are doing justice to all these small and medium businesses that are on this road, in addition to the housing developments. That project is estimated at \$10 million dollars.

Moving on to the area of infrastructure, we are also submitting the long-awaited northern deviation of Aguas Buenas, the North Detour 208. For that project, we are requesting eighty million dollars since this project has two stages. We have a problem with traffic jams to enter the town of Aguas Buenas from the area of Caguas. The economic development of our town has been affected by the accesses. That way, we are asking 80 million dollars for the North Detour 208.

In the economic development, we propose that it can be worked on. We have identified that the Barrio Cagueta Centro, next to Caguas, is the first neighborhood that we found before arriving to our village, the first neighborhood, that is the neighborhood that we consider a tourist sector, because we would make the most important tourist complex at the level of Aguas Buenas, and that would be the icon of economic development of our people, and are our caves, make a tourist complex there of the caves of Aguas Buenas, which have both restaurants, sidewalks, the promenade tablado to the edge of the river. That would encourage mountain biking and would be the biggest and most important attraction of Aguas Buenas. The caves of Aguas Buenas, which have never been developed at this time because of the problems that we do not have the land, and are already natural reserves.

In addition to that, Aguas Buenas has pure and crystalline waters there. For economic development we would do a second project. In the caves project we are requesting three million dollars for that development. Para... In that same neighborhood we would also establish a bottling plant to have a drinking water plant there since we have the hydrographic basins, and that will help to have enough drinking water for our people and also to supply Puerto Rico. For that project we are asking for one million dollars. And in that same neighborhood we also want to establish a municipal nursery, the Municipal Nursery of Aguas Claras, to have economic development, and also convert those farms. We have the land available from the Municipality of Aguas Buenas. And finally, we have a closed school there, not active, and we want to establish there the house of the artisan and do cultural performances. All this is part of a comprehensive tourist development project. In that school project, we asked for 600,000 dollars. That would be all on my part. Thank you very much. And we expect a response from the municipalities on the part of the entities in order to be able to dialogue about these projects.”

PRDOH Response: Housing programs outlined in the Action Plan, including the Social Interest Housing program, are not geographically limited within Puerto Rico. Residents of Aguas Buenas may be eligible to receive assistance.

As outlined in the Action Plan, PRDOH will use traditional and non-traditional methods for proving ownership. In addition, the Title Clearance program provides assistance for homeowners to obtain clear property title.

Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Economic Development programs are outlined in the Action Plan.

Comment: #064_10-19-18_Dayani Centeno (San Salvador Neighborhood in Caguas)

“My name is Dayani Centeno Torres, I direct the non-profit organization Voz Activa, we are dedicated to supporting groups, communities and institutions that want to organize with a local focus, with a participative base and with a solidary vision. As part of our work, we have seen the wonderful path of self-management of San Salvador Neighborhood in Caguas, in its efforts to achieve energy efficiency, and the work of its community board called Comunidad Organizada de San Salvador (Organized Community of San Salvador). Like so many other neighborhoods, they were more than seven months without electricity. The neighbors still suffer recurrent interruptions in this service, but over 250 out of the almost eight hundred families of San Salvador are currently working on the installation of a system of solar nano-networks to solve their need, at low cost, with ecological awareness and from a logic of community enterprise.

In this way, Voz Activa and other organizations have collaborated with workshops on renewable energy on social micro-networks, which is an economically successful project in rural communities in the United States and other parts of the world, and supporting the planning of different stages, such as the collection of energy consumption data from the 250 households that wish to participate, in addition to intermediaries with funding sources that exist for these projects. This is how we have learned from multiple options for corporate organization and sources of funding for projects like this one. We have talked with experts about corporate structures that allow community management of energy systems, the use of tax credits to finance equipment, and how it is possible to leverage the impact of public funds such as CDBG-DR to maximize their reach in communities.

These electrical micro-networks are renewable energy generation and storage systems that can operate connected or disconnected from the Electric Power Authority. Contrary to individual systems, residents install these micro-networks on the roofs of their homes allow them to share the infrastructure, distribute the costs and generate profits for the community organization. It is a collaborative model that encourages the participation of neighbors who may not have the resources to have individual systems, as well as those whose properties do not have conditions for a roof system or who have ownership problems, in addition to being part of a philosophy of environmental and community sustainability. Micro-networks in San Salvador has support, in addition to 3 already mentioned, UPR Mayaguez, universities in New Hampshire, financing experts, renewable networks in the United States, including the law firm Foley & Lardner, in Washington DC, which is representing San Salvador in the corporate and contribution aspects. However, no source of funding has the possibility of covering 100% of these types of projects.

The estimated cost of micro-networks in San Salvador is about 6 million, but projections are that funds could be allocated to cover 20% of that cost from CDBG-DR funds, and that 80% of the cost can be covered by other funding methods. We know that there are many more communities in Caguas, such as Borinquen Neighborhood, and in Puerto Rico, such as San Lorenzo, in Naguabo

and Utuado, that are willing to appropriate their energy sources for both resilience and economic development, just for low- and middle-income families.

Our recommendation for amendment to the Puerto Rico government's plan is that planning funds, particularly community resilience comprehensive planning funds, as well as energy efficiency funds, be dedicated to projects such as COSS, in San Salvador, either through municipalities or through community-based development organizations, who would be the owners and administrators of the social enterprises, and would bill electricity to families, combined with tax credits for social investment, federal tax credits, which could be exploited, and from each CDBG-DR dollar allocated, five additional dollars are generated that the government does not have to cover.”

PRDOH Response: The Community Energy and Water Installations program aims to provide sustainable, renewable energy, which may include solar power, to eligible residences and small businesses. Please refer to the Action Plan for more information.

Infrastructure projects may be funded under the FEMA Coordination, Critical Infrastructure Resilience, or City Revitalization programs.

Comment: #065_10-19-18_Sr. Ramón Rodríguez (San Salvador Neighborhood in Caguas)

“My presentation has the same objective as the previous four about San Salvador Neighborhood, so I will be brief. I live in San Salvador Neighborhood in Caguas. I want, first of all, to express our gratitude for allowing us to present to the government of Puerto Rico a need and a dream that our San Salvador Neighborhood has, as well as a petition to help us realize this dream.

San Salvador is one of the most isolated neighborhoods in the Municipality of Caguas, and one of the most mountainous. As a consequence, the repair and maintenance of the electricity system is extremely difficult and expensive. After Hurricane Maria, we spent a minimum of six months, and much more for some residents, without electricity service. Outages that used to be frequent before Maria are now part of our daily life. In response to this situation, COSS took the decision to implement a plan that had been in place for several years before Maria, and is to develop a solar energy project for all residents interested in this option.

In order to train the community, 5 three-hour Saturday workshops were held, each led by an engineer and a lawyer, experts in solar energy and advice. Approximately 300 people attended the workshops, who gave a unanimous vote at the end of the last workshop on approval of the micro-networks project in San Salvador.

In short, the community is mostly well oriented and determined to take the step from fossil energy to renewable energy. Following the workshops, COSS conducted a house-to-house process for families interested in the project. Specific data necessary for the installation of the equipment was collected, such as measurements and photos of the roofs, photos of the electricity meter, monthly consumption, and so on. So far, we have this information for the 150 households, which is expected to be the first stage of the project, because there are others more involved.

The COSS and its board of directors, for their part, have experience in handling donations and funds, since in the past they have received donations from the Ford Foundation, the Toyota

Foundation, and other non-profit agencies. As a result of these donations, we have a multi-service center, a small community museum, a solar water filter that provides free water for those who need it, and an ecological garden that annually presents an agro fair, where neighborhood farmers exhibit their agricultural products, and workshops are offered on the cultivation of plants.

Now we move on to the largest project in our 21-year history as a community organization, the micro networks project in San Salvador. We request that the San Salvador Organized Community be considered in the distribution of CDBG's allocated funds. The benefits of this great project will be far greater than the mere fact that the residents of San Salvador have more efficient and economical electricity. Awareness will be raised of the importance of conserving and not polluting the environment. There will be jobs for residents in the community, installation, maintenance and administration of the project and, above all, awareness of the power of community unity. With God's help and the support of our agencies, the micro-network project of San Salvador will be successful and will become an example for other communities in Puerto Rico."

PRDOH Response: The Community Energy and Water Installations program aims to provide sustainable, renewable energy, which may include solar power, to eligible residences and small businesses. Please refer to the Action Plan for more information.

Infrastructure projects may be funded under the FEMA Coordination, Critical Infrastructure Resilience, or City Revitalization programs.

PRDOH thanks you for your commitment to sustainable energy.

Comment: #066_10-19-18_Mara Marrero

"My name is Mrs. Mara Marrero, I am the administrator of HIMA San Pablo, Fajardo; we came here representing the 3 HIMA San Pablo Hospitals, we already gave a presentation in Fajardo, where we exposed all the HIMA projects, but we came here representing the HIMA San Pablo - Fajardo Hospital and the HIMA San Pablo - Humacao Hospital.

Basically, we wanted to expose our need. We were there during the hurricane season, we offered services to all our patients, and we never closed our doors. In fact, we had to provide shelter to all patients and their families who showed up there, we never denied food, treatment, shelter, or safety. So I come on behalf of all the hospitals. I know there have been many very interesting proposals here from the municipalities, but for us from the hospitals, the hospital infrastructure has suffered a lot here in Puerto Rico.

We in Puerto Rico have about 100 hospitals, and really almost all of them oscillate between more than fifty years, and because the structures have suffered a lot of damage. We as such here in Fajardo suffered damage to the physical structure of the hospital. We have not yet been able to recover the signs or the storm window, we have not been able to remove them, and we have suffered considerable damage to the infrastructure. For us, our priority is to offer treatment to the patient.

So the infrastructure as such we have left for the latter because it really is not our priority at the moment. We the hospitals need a lot of help to be able to restore all systems, public and private. We are a private system that offers most of the services here in Puerto Rico. We are a

supratertiary system, where we offer services to stroke patients, heart attack patients, we have a burn unit, we have a cancer center, and all specialized services are offered by HIMA San Pablo Hospital. So we come here to expose our need.

We are really here to provide a service to our community. We want to continue providing the same service. We never closed the doors to patients who needed oxygen in our hospital, patients came to receive therapy, only to connect their therapy machine, to be able to give therapy in the hospital, and we want to continue doing so. We want that if an emergency occurs here in Puerto Rico again, we can continue to offer all these services to our patients because we understand that there is a need and that we all have to help each other. And we, as a hospital, want to continue offering the best service to our patients.”

PRDOH Response: Thank you for your comment. Infrastructure projects may be eligible for assistance under the FEMA Coordination, Critical Infrastructure Resilience, and City Revitalization programs.

Comment: #067_10-19-18_Mr. Andres Rodriguez

“Andres Rodriguez, Director of HIMA San Pablo de Humacao Hospital. We would like to add that apart from the presentation that, I correct, was in Toa Baja, in the previous view of Toa Baja, all our projects are presented in request of funds, but we include, or HUD does not include in the action plan of the CDBG-DR the possibility that hospital institutions can handle this money, but it is more generic to the health industry, and in different efforts that we have been doing as the HIMA-San Pablo group, we want for record purposes, to add or recommend that a language be added that reads like this in English “eligible economic revitalization activity may include allowing for acute care hospital facilities ranging from large teaching institutions to small, rural critical access hospitals, to have access to grants or affordable financing for remodeling, expansion, modernization, equipment, refinancing mortgage debt and acquisition. These related activities should be prioritized to existing healthcare providers, particularly those hospitals with existing specialized medical units”.

In the HUD report, the Disaster Recovery Action Plan "submitted" on July 29, 2018, presents that the mortality rate after the hurricane until December 31, 2017 had an increase of 62%, and presents that medicine, or better said, hospital and medical services in Puerto Rico are "underserved", not the services at capacity because of the lack of specialized services and intensive care services per "capita" and that is what we want to promote in these efforts, and what we want to bring to light, that not only the HIMA San Pablo group, but all the hospital institutions are in need of this language to be added in order to be able to make that direct request with projects that are proposed for improvements of the health system of Puerto Rico.”

PRDOH Response: Thank you for your comments. PRDOH has taken this into consideration.

Comment: #068_10-19-18_Michael Kusik (World Housing Solution and Alpha Solar)

We represent World Housing Solution and Alpha Solar, a Company based here in Puerto Rico. I’ve been in Puerto Rico for a year supporting first the emergency communications restoration and

then assisting with the medical reconstruction on Vieques and working on Department of Vivienda project, Tu Hogar Renace finally.

By far the most exciting phase of recovery is yet to begin with the CDBG plan of action we are here to discuss today and it's an honor to be able to take part in this hearing. The governor of Puerto Rico submitted to the United States Congress Puerto Rico's 12 and 24 month economic and disaster recovery plan to outline his vision for the island. I want to focus on the first, second and fourth plan, points of this plan as discussed in the CDBG Action Plan.

Point one, society; reduce citizen immigration by repairing the human welfare by promoting a society that is educated, healthy and ultimately sustainable. Two, resiliency: prepare Puerto Rico's individuals, businesses and communities to better withstand and recover from future disasters by implementing a redundant energy system and improve codes and standards and four, infrastructure. Support all Puerto Rican citizens and industries by rethinking and redesigning, reconstructing and strengthening the critical infrastructure to become a more modern and resilient system, in turn, providing reliable and affordable energy, water, communications and transportation to improve emergency preparedness and resiliency.

In order to accomplish these goals, reduce immigration, become resilient, strengthen the infrastructure, we must look at holistic, multi-disciplinary approach to problems such as the housing crisis and determine solutions that also support the other recovery missions. I represent two companies that believe strongly in energy efficient housing, World Housing Solution and Alpha Solar. We have the ability to build homes that can be put up in a matter of days, finished in a matter of weeks and have two to three times the energy efficiency of standard construction. As to the strength and durability of our materials please see the video screen, one of the video screens.

These homes can be engineered to withstand hurricane force winds and can be built with a solar solution integrated into the housing structure to foster true resilience when disaster strikes again, when disaster strikes again. We are faced with two options: we can spend billions of taxpayer dollars to utilize 100-year-old technology in the construction of homes and attempt to integrate that with an action plan that bring Puerto Rico into the future or we can truly step into the future through exploratory ventures and the technology that the U.S. Department of Defense, Puerto Rican Army National Guard and the even the Puerto Rican Department of Health is currently using.

We request that all funds earmarked for new home construction under the previously mentioned reconstruction program have an efficiency requirement with a high threshold and that funds earmarked for electrical grid resiliency have an allocation for publicly owned solar solutions placed on these new and reconstructed homes to provide resilience for the individual family and an overall benefit to the grid. We have structures in Palau that have currently survived two typhoons. In Mississippi our structures have made it through two hurricanes and seven tropical storms unscathed, we know our business.

I came to Puerto Rico a year ago for a couple of weeks of recovery work. A couple of weeks of recovery has turned into a marriage to an amazing woman from Cidra, a baby on the way and a dedication to making this island fit for future generations to raise our families without fear of a

lack of safe housing. Without fear of a lack of medical care or clean water or good schools. We have an opportunity that we have never truly had before in the wake of hurricane Maria, to build this island into a home worthy of the people that live here. Puerto Rico rises.

We have a few questions that we would like submitted, these will be answered in the future amendments from what we understand. One, will there be a central contracting office to oversee contracting for CDBG programs? The second question is: Where will points of contact for each program be posted for public consumption? The third: How soon will the revolving construction loan program begin? Many of these companies that, particularly Puerto Rican companies that would like to take part in these programs need time to get spun up and undoubtedly it will take time file the paper work. And fourth: Will the construction loan program work together with contracting for the construction programs so that there can be a marriage between loans and grants and the program that it's for."

PRDOH Response: PRDOH is committed to leading a responsible and transparent recovery effort. As required by 83 FR 5844, PRDOH must post information related to its CDBG-DR Grant to its website for public consumption. Information including procurement policies, contracts, Quarterly Performance Reports (QPR), expenditures, program policies and procedures, and other related information will be posted to PRDOH disaster recovery website at www.cdbg-dr.pr.gov as it becomes available.

As mandated by HUD, PRDOH must follow HUD-approved procurement processes which encourage fair and open competition and comply with 2 CFR 200. Information regarding contracts procured by PRDOH related to its CDBG-DR grant, including contract value, start and end dates, summary of scope, and complete copies of executed contracts, is available publicly at <http://www.cdbg-dr.pr.gov/contratos/>.

PRDOH anticipates that the Construction and Commercial Revolving Loan program will start in early 2019. Information regarding how to apply to the program will be posted to the website, as part of program guidelines, when it becomes available.

Comment: #069_10-19-18_Feliciano Rodríguez

"My protocol greetings to the representatives of public agencies present, 3 secretaries, the mayors, some have already retired, directors, and especially the public of the communities that follow these views with the hope that the money will be used for the improvement of their communities and needs, particularly to my colleagues and friends of the Barrio San Salvador de Caguas. My name is Feliciano Rodríguez Dominguez, I am a Catholic priest, parish priest of the Parish El Salvador, which covers the entire Neighborhood San Salvador de Caguas and also nine of the communities of the Neighborhood Borinquen de Caguas. I was assigned to pastor the parishioners of this parish on September 3, 2017, so I began with the passage of hurricanes Irma and Maria, good start, but because I was born and raised in the same Neighborhood San Salvador, I can attest first hand to the situation of the community since my childhood.

The impact of the hurricanes was direct on the south of Caguas, leaving, according to NOAA, one of the highest precipitation rates of the whole island, between 25 and 40 inches of rain with total

devastation. More than 100 families were left homeless. As soon as the events passed, the community was launched to attend to the emergency, to open breaches and roads, to install electricity and water systems, and to help the neighbors. I am part of the group of the Organized Community of San Salvador, COSS, which since December 2017 has been engaged in the task of building a community micro grid to ensure energy efficiency of citizens through solar energy.

We continue with constant interruptions and blackouts almost weekly and sometimes for more than 24 hours due to the fragility of the electrical system. I attest to the unanimous purpose of all the neighbors, including the Catholic Church and the Pentecostal Church that we have joined in this project of community resilience and economic growth. I request that CDBG-DR funds be allocated to the Municipality of Caguas in the plan that the Municipality has prepared on micro grids and that has been consulted with the community that can be directed to support this project, funds for planning and design, as well as for implementation and construction.

Allocating these funds is critical not only because it will meet the need to provide stable energy to thousands of residents, but because it will help benefit low- and moderate-income people in two primary ways. First, residents will be able to save money to recover financially. The almost eight months that we waited for the restoration of electric service led to the loss of savings in all households, already a community under the poverty level. We all went down in the personal and family economic level.

That time represented the loss for each family of thousands of dollars in fuel, temporary electrical installations, damaged belongings, generating plants and other equipment that had to be purchased, in addition to repairs, all in the midst of what was lost in the hurricanes, in homes, farms, lack of employment, property in general. The distance of the community from the urban center complicated everything related to medical or government services, as well as access to banking and commerce.

The aid received could be delivered to those who needed it most thanks to the effectiveness of the community organization in serving those who really needed it, otherwise the effect would have been more devastating. After the months of resisting the lack of energy, we were faced with a somewhat chaotic response from the agencies and the government, since food or other items could suddenly arrive, but the institutions were not coordinated among themselves.

Tu Hogar Renace had great difficulty due to the lack of property titles from many neighbors, and their help did not allow people to rebuild concrete roofs or walls for the necessary resistance in the event of a new hurricane event. Internet service has not yet been properly restored, and the signal where it is received is weaker than before the hurricane. It is not possible to continue investing in the same thing every time the electrical system fails.

The poor people in these communities can no longer afford it and have decided to break that cycle. If it were possible to offer, secondly, a less expensive electric service with some kind of energy incentive for small entrepreneurs with the guarantee of stability and energy efficiency, I am convinced that new micro-enterprises will be created in the areas of agriculture, livestock, services, tourism, sales and manufacturing. There are people who with adequate support will remain in the community, because it offers the attraction for residents to have residences, food harvested on the same farms, home gardens, drinking water, and human quality.

These communities have enormous development potential for self-employment and can move from dependence to a production economy that retains residents, particularly youth and young adults, avoiding emigration and transferring the problem to another jurisdiction. These communities, it has already been said, are not unaware of these possibilities and we have a lot of support from UPR Mayaguez professors, experts in financing, law firms, etc., who are willing to provide their services pro-bono to the community. I trust that we can support what has already begun in this region, above all, what has become the first objective of the community, to raise the micro grids of San Salvador, we believe that it is, if not the first, one of the first solar communities that will exist in the eastern region of Puerto Rico.”

PRDOH Response: PRDOH agrees that sustainable, renewable energy is important and has designed the Community Energy and Water Resilience Installations program with that in mind.

Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipalities to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #070_10-19-18_Víctor H. Rivera (AIMECS)

“My name is Victor Hugo Rivera, I come at this time to represent AIMECS, which is the Alliance of Solidary Community Microenterprise Incubators, and I am the Chairman of its Board of Directors. This Alliance is made up of incubators that are all over the island from different institutions. And we mention all of them so that they have an idea of how we cover. We have PECES in Humacao, in the CADEC2 project, Sor Isolina Ferre in SURCOS, in Caimito and in Ponce, we have ARCO, which covers Caguas, CONSUCON, which is Nelson Reyes, which is advising us in the world of microentrepreneurs, we also have the Alliance for Community Development, which is in Naguabo, which I am honored to be able to lead, and we have the Institute of Cooperativism of the University of Puerto Rico.

Those are basically the six, and some allies that we have to respond to the great uncertainty that there is in Puerto Rico, and the great problem that we have of poverty in Puerto Rico. We don't have to expand too much of the problem that we have about poverty in Puerto Rico, and the tools that are effective in combating this problem. Obviously, if we don't have an economic development, we are condemning, simply to live on poverty, looking for funds to continue sustaining poverty. Therefore, it is a total reality that we have to have a real, viable project to eradicate poverty and, obviously, we have a type of incubation that is not the one that is mostly observed out there, which is simply to give a few workshops, seven, eight, ten workshops, and it is already intended with this system that the person does a business. That is totally unreal.

We assume the Incubation for Accompaniment program, which is obviously, after the business is incorporated or opened, we have to give that person prudential time, sometimes quite extensive, to accompany that person in giving advice on finance, administration, human resources, accounting, and that is truly the key for a small entrepreneur to succeed in this commercial world. Basically, to engage them in opening a business, I'm afraid is almost to make them fail. Therefore, the incubation that we represent is of accompaniment. And very quickly, it is short, I want to tell

you that our presentation is going to be sent over the Internet, that is, it is much more than this, it is going to be very short, according to the indicators of employment and unemployment in the labor participation rate, Puerto Rico generates too few jobs, in other words, jobs are not being generated.

The Community Incubators of Solidary Community Microenterprises is an economic engine that really generates jobs and microenterprises. AIMECS, composed of six incubators operating in Arecibo, San Juan, Guaynabo, Caguas, Humacao, Naguabo, Carolina, is organized as a non-profit organization. What we have found is that the cost of opening a business and running an incubation process is between three thousand and five thousand dollars. That's the reality, and someone has to finance that kind of... At the moment, we are counting on philanthropy at different levels.

Our recommendations immediately, because we have had in the past that there have been government projects to finance this type of work, but extremely scarce, and really the government bureaucracy prevents these services from being financed recurrently. Let's go to the recommendations, let's assume a strategy that the incubation of community microenterprises be a strategy for the eradication of poverty in Puerto Rico. On October 17, a celebration of the global day for the eradication of poverty, it seems that this was by the Association of Banks, that in Puerto Rico there is no detailed plan to eradicate poverty, and that was by the Association of Banks that we were there, and nobody really had a plan to say how to eradicate poverty in Puerto Rico.

We believe that a fund will be created that will be recurrent for the next five years so that it will be exclusively for incubators of community microenterprises and that there will be representation of this institution in this plan so that the bureaucracy that has consumed us in the past will be avoided, and we have had to bite the bullet in order to sustain it. And we believe that through this alliance, that we have six incubators, we can manage and avoid excessive bureaucracy, and we have sometimes had consequences, and I am telling you personally, even with the money, we have been from six to eight... up to a year to be able to charge for these services, including much more, sometimes up to a year, and we have given the service. So thank you for allowing me to speak, this short speech, because the time is over there, but thanking you... We believe that if there is no economic development program, we are destined for permanent poverty in Puerto Rico."

PRDOH Response: Thank you for your comment. These suggestions have informed PRDOH in the development of the Small Business Incubators and Accelerators program.

Comment: #071_10-19-18_David Carrasquillo:

"This time I'm not presenting myself as before, I'm presenting myself now as president of the Puerto Rican Planning Society. I think there is also here..., I already had the question, but of the answer that he gave previously to the colleague, I have to ask. And I think it would be the perfect opportunity to answer. There has always been confusion as to whether an RFP, or a call for proposals, will eventually be opened, since as you mentioned they were asking municipalities to submit certain types of proposals, but there have never been published any requirements or

criteria for evaluating the proposals, which we know that many people have never submitted anything. And it has not come to these public hearings because they want to present well-made proposals, based on the criteria that have the opportunity to make them with real possibilities of being accepted based on the evaluation criteria that the different agencies are going to have to select.

To give the most concrete example, for example, in the reconstruction item that amounts to approximately two trillion dollars. This reconstruction is at the same time that the displacement of communities is together in the same program. That is in the action plan and in the recovery plan of Puerto Rico the strategic projects have name and surname. They are already selecting... which are the projects that are going to be giving them money without having said what are the criteria. Just as it has not been identified what are the criteria for selecting partners, of the "partners" for each of these programs. Which is the continuation of the question I already asked. In the COR3 recovery plan, is there any way to explain how they already have what the strategic projects are? ...How were the strategic projects selected? ...I mean, but it was never opened to a selection process, to a call for proposals to do that... What citizen participation was there in the selection of the strategic projects of the Puerto Rico Recovery Plan?....

Well, to close. I don't know if you can do it officially or not, but the government recognizes the difference between a call for proposals and a public hearing. I don't know if you can answer that... I mean, what I want to make clear is that a lot of people refrain from participating because preparing a proposal at the community level is an extremely onerous process and involves a lot of meeting work, hiring engineers, hiring planners, architects... That is, the summons to these public hearings, in this case there was yes, I think it was three weeks in advance. But in other cases there have been seven days in advance. In other words, what I am trying to get across is that making a proposal takes much more than a month to make a serious proposal. And it also involves responding to criteria pre-established by the agencies and by the government so that they can make a participatory process internally in the communities so that when they come to participate in these spaces, they are not doing it adrift. They are certainly doing so by responding to official documents that are to be evaluated and that there are criteria. However, my concern is that in the end these public hearings will take place as if they were the equivalent of a call for proposals which did not exist, which did not happen."

PRDOH Response: The public comment process regarding this Action Plan including the public hearing process is intended to gather valuable feedback from the public regarding the contents of the Action Plan. This public participation process is separate from procurement efforts related to CDBG-DR funds. The public comment process resulted in a wealth of information exchanged. Hundreds of submittals from the public were received. Although each proposal may not have been referred to by name in the Action Plan, all submittals have been reviewed carefully by PRDOH and were considered in the development of the plan.

As mandated by HUD, PRDOH must follow HUD-approved procurement processes which encourage fair and open competition and comply with 2 CFR 200. Information regarding procurement, including any Requests for Proposals (RFP) and contracts procured by PRDOH related to its CDBG-DR grant, including contract value, start and end dates, summary of

scope, and complete copies of executed contracts, is available publicly at <http://www.cdbg-dr.pr.gov/contratos/>. Interested parties are encouraged to monitor www.cdbg-dr.pr.gov for contracting opportunities as they become available.

Comment: #072_10-19-18_José Cruz

"My name is Jose Israel Cruz Ruiz, I grew up in Bayamon, Puerto Rico. I am 21 years old. I come here in my personal capacity. I don't come representing any organization, any industry, any special interest. I simply come because I am a young man who cares a lot about the future of Puerto Rico, who wants these funds to be used in the most appropriate way. And that they can also improve Puerto Rico's energy system. I am a young man who has a lot of passion for the energy issue and a lot of concern for the energy issue regarding what is happening right now in Puerto Rico.

I want to come here simply to comment, to reiterate, to emphasize things that I already know, you have heard before about the importance of being able to invest in the independence of energy residences in Puerto Rico's homes. I just want to highlight the report I read the other day from the collaborative that created the Rocky Mountain Institute, which they used to create the new bill introduced by Senator Seilhamer, where they describe in their goals, what they think about their professional capacity, their capacity as an expert in this industry, that it is essential that the CDBG-DR Housing Department fund allocate no less than fifty percent of the block grant funds to the green energy fund to provide tier grant funds for the installation of solar power and battery projects. To provide funds for training programs for green jobs, giving priority to retraining workers at the Authority. And to provide funding for energy efficiency and resilience programs.

I had the time to read the one on the website, to see what already existed on these issues. I understand that right now about four hundred and thirty-six million dollars are allocated for energy resilience. However, the programs described in that section are more ambiguous about exactly how you anticipate dividing those funds and how they are going to be accessible to people. Specifically, it says that incentives similar to "Green Act Refund" would be created without really explaining how that would work, who would be in charge of choosing initiatives worth giving money to. So simply as a concerned citizen, a young man who loves the subject of energy, who wants to be able to work on it for many years, but who is concerned about the future of Puerto Rico, I simply wanted to lay down for a moment the importance of remembering that as we think about how we are going to use these funds, let's think about their long-term impact. It doesn't seem to me that there is another sector that has to do with housing that is more crucial for Puerto Rico at this time and more impactful in the long run than making accessible to the average Puerto Rican the ability to find energy resilience through the new technology changes that are occurring.

I think it would be wonderful if the Department of Housing when doing an analysis of all the things that are being given to it, there is a real analysis of what the long-term impact is. And according to that, I would understand that, it would be understood that there really is no better place right now than in Puerto Rico's energy sector. The more our "homeowners" and our company make the transition to green energy, solar energy and resilient energy, the better is for all of us. That's all. Thank you for taking the audience. Excuse me for stopping the "break" so that I could depose, but

I am very grateful that there are other platforms for any concerned young person or citizen who simply wants to see a Puerto Rico move forward. Thank you very much.”

PRDOH Response: Thank you for commenting. PRDOH agrees that sustainable, renewable energy is important and has designed the Community Energy and Water Resilience Installations program with that in mind.



Public Hearings | Questionnaires

PRDOH hosted fourteen public hearings during the public comment period associated with the substantial amendment to the Action Plan. Approximately 600 people attended the hearings, which were held in morning and evening sessions and in various locations around the island, as shown in the table below.

Date	Location	Time
October 15, 2018	Toa Baja	9:00am – 1:00pm 2:00pm – 8:00pm
October 15, 2018	Guayama	9:00am – 1:00pm 2:00pm – 8:00pm
October 16, 2018	Barranquitas	9:00am – 1:00pm 2:00pm – 8:00pm
October 16, 2018	Manatí	9:00am – 1:00pm 2:00pm – 8:00pm
October 17, 2018	Moca	9:00am – 1:00pm 2:00pm – 8:00pm
October 18, 2018	Guánica	9:00am – 1:00pm 2:00pm – 8:00pm
October 19, 2018	Fajardo	9:00am – 1:00pm 2:00pm – 8:00pm

During the hearings, the PRDOH Team presented the Action Plan and gave an overview of all twenty-seven (27) programs contemplated in the substantial amendment. Attendees at the hearings were given the option to make an oral presentation, deliver hard-copy comments, or complete a hand-written comment form or questionnaire. All comments submitted or voiced during public hearings are memorialized and responded to within these pages.

Because questionnaires offered specific prompts, comments collected via completed questionnaires are grouped and responded to in the following section for the convenience of the reader. A blank questionnaire, in its entirety is included on the next page, for reference.



Citizen Participation Questionnaire

Name (optional): _____

Municipio _____

Community _____

How have you have been impacted by Hurricanes Maria or Irma? Check all that apply.

<input type="checkbox"/> My home is damaged or destroyed	<input type="checkbox"/> I do not have sufficient access to electricity	<input type="checkbox"/> I lost my job.
<input type="checkbox"/> I had to move out of my primary residence	<input type="checkbox"/> I do not have sufficient access to water	<input type="checkbox"/> I have limited/no access to basic household goods (groceries, clothing, etc.)
<input type="checkbox"/> My home is in danger of foreclosure	<input type="checkbox"/> Roads in my neighborhood are damaged and/or impassable	<input type="checkbox"/> My business lost customers
<input type="checkbox"/> I have lost income from rental property	<input type="checkbox"/> I rely on public transportation that is no longer available	<input type="checkbox"/> My business is too damaged to operate
<input type="checkbox"/> There are unsafe and/or abandoned structures in my neighborhood	<input type="checkbox"/> Facilities I rely on for healthcare are closed or have relocated out of my neighborhood.	<input type="checkbox"/> My business lost necessary employees
<input type="checkbox"/> Other, please explain:		

Of the items selected above, what are your top three recovery priorities?

1. _____

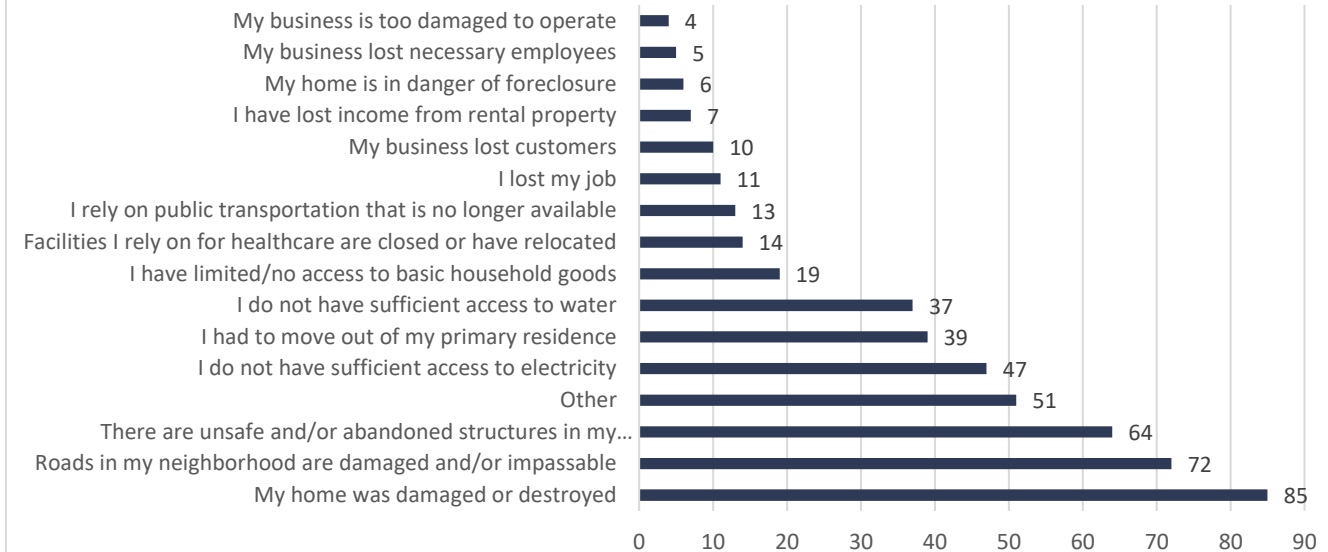
2. _____

3. _____

Additional Comments:

The questionnaire asked citizens to identify ways in which they were impacted by Hurricanes Irma and/or María. The graph below represents the aggregated responses to the prompt. These citizen-identified priorities informed PRDOH in design of programs and funding allocation.

Public Recovery Priorities



The following pages memorialize and individually respond to the three free-form prompts included in each questionnaire:

- If other, please explain. (If “other” was selected as a way in which the respondent was impacted by the storms.)
- Of the items selected above, what are your top three recovery priorities?
- Additional comments

Responses of “NA” indicate that no response was included in the questionnaire for a particular prompt. Other responses are direct quotes or translations of direct quotes from the comments written on questionnaires.

Comment: #001_10-19-18_Gladys Orengo Ortiz

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"I don't know what's going to happen with my house. When the river rises, it makes me nervous and I don't sleep."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #002_10-19-18_Provi Pérez Silva

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"I hope the promises don't stay in the air. The most important thing Urb. Luchetti in Yauco wants is that everything was promised happens and fast. These houses won't resist another hurricane and we want to leave Urb. Luchetti. Priority – When are you going to appraise the property and relocate us?"

PRDOH Response: Voluntary relocation assistance is available through the Home Repair, Relocation, or Reconstruction program. Information currently available regarding this and program is available in the Action Plan.

Comment: #003_10-19-18_Moraima Lamboy

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:



"Relocation of house in a zone that doesn't flood. River cleanup and dredging. Notify promptly the decisions made for Urb. Luchetti residents."

PRDOH Response: Voluntary relocation assistance is available through the Home Repair, Relocation, or Reconstruction program. Information currently available regarding this and program is available in the Action Plan.

Comment: #004_10-19-18_Eneida S. García

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"When the river rises, it makes me insecure. I want to leave the area, please. I don't sleep if it rains at night. I haven't been able to be home and rain makes me crazy."

PRDOH Response: Voluntary relocation assistance is available through the Home Repair, Relocation, or Reconstruction program. Information currently available regarding this and program is available in the Action Plan.

Comment: #005_10-19-18_Nicky Cruz Baie

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"I don't feel safe because the river is constantly threatening to overflow and it's causing me emotional issues. Safety for my children and me. I'm a patient of depression and all of this is affecting me a lot and until today I haven't received any assistance."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #006_10-19-18_Luis M. Lugo López

If other, please explain:



NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"I'm at the edge of desperation, it's been a year and the situation is not solved. Having a new house, since mine is inhabitable. Solving the issue with the mortgage of the house that was destroyed. I have to move son from my relative's house."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #007_10-19-18_José E. Laracuenta Morales

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"My house is in danger of being foreclosed. I don't have enough Access to water. I had to move from my house."

PRDOH Response: Currently available information regarding Housing Programs and other related CDBG-DR programs are available in the Action Plan.

Comment: #008_10-19-18_Charito Oliveras

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"Based on the experience lived after Hurricane María we understand it's necessary to prepare a place that can serve as shelter for the families in our community. There's a closed school, which is a good option to set up this center because with the necessary facilities it can shelter several families. The bridge on Rte. 505 KM 1.9 in Ponce. Illumination on Rte 505. The pavement of Rte

505 and its sectors are very deteriorated. We have problems with the bridges on the main road Rte 505 KM 1.9, road lighting on Rte 505. Road Viejo, Road Tessionere, Road El Cedro.”

PRDOH Response: Thank you for your comment. The Community Resilience Centers program outlined in the Action Plan creates a known network of clearly identified and registered community resilience centers across the island to support communities during disasters.

Comment: #009_10-19-18_Haydee I. Santiago Rivera

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“The house where I lived belongs to my sister and she loaned it to me, the roof was damaged by Hurricane María and I lost everything. They denied me assistance because I’m not the owner currently and I’m at a relative’s house. I was denied assistance. I need to rebuild the roof and the electricity. I lost all my property. The owner of the property is my sister and she’s in the U.S. I need a place to live with my 90-year-old mother and we are living in someone else’s home. If you could help me buy a house.”

PRDOH Response Thank you for your comment. The Homebuyer Assistance program outlined in the Action Plan provides assistance with down payments and/or closing costs associated with the purchase of home.

Comment: #010_10-19-18_Jose Roberto Pérez (Consultor y Tasador)

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“As an appraiser and consultant, many people ask me what alternatives they have. That’s why I’m here, to inform them and be able to guide them properly. Once a case is approved, when do we start seeing results: relocation, etc.?”

PRDOH Response: PRDOH is committed to leading an expedient recovery effort. Information regarding program progress will be posted to www.cdbg-dr.pr.gov as it becomes available.



Comment: #011_10-19-18_Anonymous 1 (San Juan)

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“Damage to structures.”

PRDOH Response: Currently available Information about the Housing and Infrastructure Programs can be found in the Action Plan.

Comment: #012_10-19-18_Anonymous 2 (Toa Baja)

If other, please explain:

“Cleanup and deep dredging of the channel. Weeds and debris on main roads. Stray animals.”

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

NA

PRDOH Response: Thank you for your comment. PRDOH will take these comments into consideration during further development of the programs outlined in the Action Plan or during development of new programs if additional funding becomes available.

Comment: #013_10-19-18_Rafael Cintrón

If other, please explain:

NA

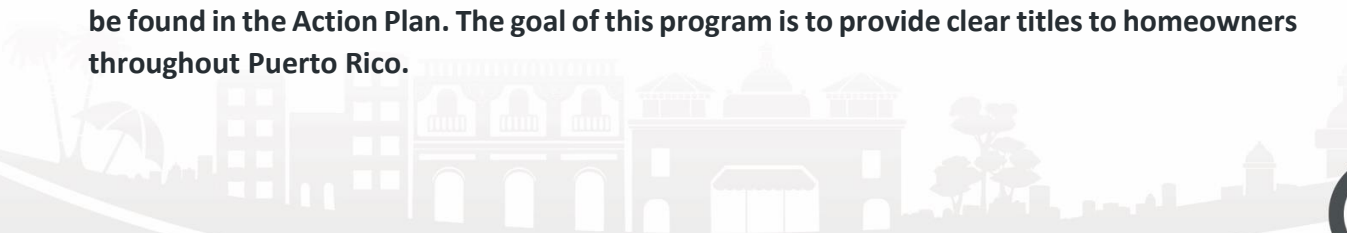
Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“The house where I live is part of an inheritance. I need legal assistance to have a deed or help with another house. I’m 76 years old and have medial issues and a limited income with a wife and a child in elementary school.”

PRDOH Response: Currently available information about the Title Clearance Program can be found in the Action Plan. The goal of this program is to provide clear titles to homeowners throughout Puerto Rico.



Comment: #014_10-19-18_Liza M. Cruz Cancel y Josue M. Benitez

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“Looking for information on the CDBG-DR 2018 program and how we can contribute with our Engineering and construction company for the new projects.”

PRDOH Response: Information regarding procurement, including Requests for Proposals (RFP), will be posted to www.cdbg-dr.pr.gov. PRDOH encourages interested parties to monitor the website for opportunities.

Comment: #015_10-19-18_Juanita Ortero Cristóbal

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“The neighborhood flooded, we were evacuated and I went to live with my sister while my home was being cleaned and repaired. My home and the roads.”

PRDOH Response: These needs have informed PRDOH in the development of the Action Plan. Currently available information about the Housing and Infrastructure Programs can be found in the Action Plan.

Comment: #016_10-19-18_José R. Rondon Dieppa

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“For the next hearings, the basic addresses, it was very poorly done.”

PRDOH Response: This comment has informed PRDOH for the development of further citizen engagement procedures.

Comment: #017_10-19-18_Carmen Judith Juarbe

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"I need to fix the roof inside the house, it gets wet when it rains. There's wastewater coming in to the carport. I need an Access ramp to my house. Ceiling inside the house. Wastewater problema. Ramp, access to the balcony. Debris removal."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #018_10-19-18_Rosa C. Vergara Rodríguez

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"Renace helped a little with sealing the roof, but they haven't done anything else. Fix the structure of my house. Provide utility equipment (refrigerator, microwave, etc.). The ceiling inside the house is falling, fix it."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #019_10-19-18_Angela Caballero Velázquez

If other, please explain:

NA

Of the three items selected above, what are you top priorities?

NA

Additional Comments:

“I have rats and vermin in my house because it’s a wood and zinc house. My roof and walls were damaged. Transportation. I want to return home.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #020_10-19-18_Evelyn Rivera Arias

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“Flooding, canalize La Plata, filtrations on the roof, debris, expensive building materials, we need more help, construct housing projects, etc. Damage to homes, filtrations. Lack of building materials. Look for a safe place for elderly people, bedridden people and children.”

PRDOH Response: These needs have informed PRDOH during development of the Action Plan which provide prioritization to elderly such as the Home Repair, Reconstruction, or Relocation Program, Social Interest Housing, and the Rental Assistance Program.

Comment: #021_10-19-18_Miguel A. Román Portalatín

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“This property – built with so much sacrifice working since I was young, for income in my old age, I’ve lost it. I only have one floor – generating \$450 monthly – the lower floor is completely lost. I’ve been able to repair it little by little. I haven’t been able to repair the top floor. My big concern is the payment for the CRIM, which is \$2,200.00 a year (\$1,100.00 every 6 months). A very high price. A very large CRIM payment. House without rent since September 20, 2017 until now. How can you help me in my situation? Can the municipality buy me that property? How can you help

me? I'm a Korean War veteran, I'm currently 90 years old. Mailing address: Miguel A. Román Portalatín..."

PRDOH Response: Thank you for your comment. Information currently available regarding opportunities for housing assistance are outlined in the Action Plan.

Comment: #022_10-19-18_Angel Ortiz Monte

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"A retention Wall to secure the house. The request is on Ana Baez Rivera's name. I came to represent her and me, her husband, Angel Ortiz Monte."

PRDOH Response: Thank you for your comment. Information currently available regarding opportunities for housing assistance are outlined in the Action Plan.

Comment: #023_10-19-18_Iris Astacio

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"Mentioned above."

Additional Comments:

"We drink water from a mountain spring "ojo de agua", there's no potable water."

PRDOH Response: The Community Energy Resilience and Water Installations, outlined in the Action Plan, is geared toward providing sustainable, resilient water and energy solutions for residents.

Comment: #024_10-19-18_Angel Luis Torres Berrios

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“I had damage in my property, house and land, as a 5’ landslide. Landslide and since my house is part of federal housing, I looked for FEMA assistance and got denied, only a loan and I’m no position to receive a loan. I’m not well financially.”

PRDOH Response: Ineligibility for assistance under other disaster recovery programs, such as FEMA, does not automatically disqualify residents from receiving assistance through programs outlined in the Action Plan. Residents who were denied assistance by FEMA may be eligible to receive assistance from PRDOH programs. The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #025_10-19-18_Eliezer Ríos Díaz

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“The reason is that I didn’t receive any FEMA assistance and I had a very dangerous landslide behind my house.”

PRDOH Response: Ineligibility for assistance under other disaster recovery programs, such as FEMA, does not automatically disqualify residents from receiving assistance through programs outlined in the Action Plan. Residents who were denied assistance by FEMA may be eligible to receive assistance from PRDOH programs. The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #026_10-19-18_Carlos R. Alicea

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"I applied 3 times to FEMA and it was denied. Hogar Renace either, only covered some things inside the house. I've changed the tarps 4 times that I have bought."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #027_10-19-18_Julissa V. Díaz Avilés

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"I hope you can help me have my home. I'm in a rented house right now because I can't live in my house and I can't build one because of the land. Having a stable home where I can live with my own water and electricity. Having good physical and emotional health."

PRDOH Response: The Homebuyer Assistance program, outlined in the Action Plan provides assistance with down payments and/or closing costs associated with the purchase of home.

Comment: #028_10-19-18_Celydenise Díaz Díaz

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"The loss of my home. Loss of my job. Having all basic needs limited because I don't have a job."

PRDOH Response: Information regarding the Housing and Economic Recovery programs are outlined in the Action Plan.

Comment: #029_10-19-18_David Berrios Zayas

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“The road connecting route 152 with route 779 of Las Orquideas sector was destroyed by the trucks rented by FEMA to the company that removed the debris and established the debris deposit in a lot in the area.”

PRDOH Response: This need has informed PRDOH during the development of the Infrastructure Programs. Currently available information regarding eligible activities is outlined in the Action Plan.

Comment: #030_10-19-18_Angel Díaz Santiago

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

“That the land be evaluated.”

Additional Comments:

“The roof of my house. We’re living under a tarp.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #031_10-19-18_Keishla M. Rodríguez Santiago

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

“The house where I used to live was my father-in-law’s and he lent it to me. I lost some things and was denied all the assistance. I don’t have a house or property. I hope you can help me.”

Additional Comments:

“I hope you can help me for a house please. I lost my clothes and my children’s clothes and other things.”

PRDOH Response: The Homebuyer Assistance program, outlined in the Action Plan provides assistance with down payments and/or closing costs associated with the purchase of home.

Comment: #032_10-19-18_Maria Cortés

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

“Rebuilding homes. Things that are public nuisances.”

Additional Comments:

NA

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #033_10-19-18_Rosa I. Santana Marcano

If other, please explain:

“Please add the Department of the Family and Department of Housing as first responders in the incentives to solve the housing problems and the second initiative to help have a source of additional income as a second employment.”

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

NA

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home.

Comment: #034_10-19-18_Rosa M. Marcano Baez

If other, please explain:

“After Hurricane María my house was damaged and destroyed. FEMA and Tu Hogar Renace denied my case because of income and I have proof of it.”

Of the three items selected above, what are your top priorities?

Construction of a safe house. Eliminate a pole that’s in danger of falling during the next hurricane.”

Additional Comments:

NA

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #035_10-19-18_Alan M. Rivera Ruiz

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

“Safe home.”

Additional Comments:

NA

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #036_10-19-18_Mara V. Román Bosque

If other, please explain:

“The community centers’ recreational areas are vandalized and the sport courts don’t have lighting. Head Start, Housing. We need to implement solar poles. Implement sport facilities and areas for our elderly with disabilities and children and young people of our community and other communities.”

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

NA

PRDOH Response: Municipal projects may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.

Comment: #037_10-19-18_Susana Duprey Franco

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“Fix my house that floods when it rains. Fix the electricity. House is completely abandoned next to my house. I urgently need help.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #038_10-19-18_Carmen Roldán Roldán

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“My house was damaged by Hurricane María by the winds and storm surge because my house is near the Bay at the port of Jobos and the winds and flooding damaged my house. My house was damaged by the flooding and wind and it’s unstable to live in it because the structure was damaged and I’m living with my sister since September 20. My house was evaluated by a certified contractor and he told me I can’t live there because the structure could collapse. I need help to go somewhere with my son who has autism and the house is not good for him or for me. I also have health issues.”

PRDOH Response: Voluntary relocation assistance is available through the Home Repair, Relocation, or Reconstruction program. Information currently available regarding this and program is available in the Action Plan.

Comment: #039_10-19-18_Sixto Negrón Martinez

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“Guidance about purchasing a house. Contact: email: ...”

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home. Information regarding how and where to apply will be posted to www.cdbg-dr.pr.gov when it becomes available.

Comment: #040_10-19-18_Jose L. Velázquez Padilla

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“We continue being exposed to a life and property hazard. My house was damaged. I had to move from my main house. There are structures that are unsafe or abandoned in my neighborhood. My community is located in the middle of the original river bed and at the beginning of one and the river bed.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #041_10-19-18_Vctor Basmaya

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“I had to get an SBA loan to repair my house since FEMA denied my assistance. I lost clients because I had to close my business. No structure. Abandoned structure in the neighborhood. There’s little or no transportation.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and

offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

The Small Business Financing program provides loans or grants to eligible small businesses.

Comment: #042_10-19-18_Carmen R. Rosado Sánchez

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“My house is located in a flood zone and the land is not good for improving the structure in the home space.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #043_10-19-18_Angel Rafael Cruz Colón

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

“My house was damaged. There are unsafe structures. The roads in my neighborhood are damaged. We need more repairs on Rte #179 and money to repair my property. Tel ...”

Additional Comments:

NA

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. Information currently available regarding infrastructure programs is available in the Action Plan.

Comment: #044_10-19-18_Nivia I. Santiago Santiago

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“Help to build my house. I have two children and my husband. I know many people lost their homes, I lost mine. We’re living somewhere on loan, but I need, please, that in any way possible to see our case. Whatever you can do, my family and I would greatly appreciate it.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone area

Comment: #045_10-19-18_Silvia Colón Román

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

“Evaluate my house. Relocate my house since it’s totally uninhabitable. How to get help for a house.”

Additional Comments:

“I need help with housing.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #046_10-19-18_Anonymous 3 (Sabana Grande)

If other, please explain:

“The roads in my neighborhood are damaged. My house isn’t, but houses close to me were destroyed. Take action on the problem.”

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

NA

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. Information currently available regarding infrastructure programs is available in the Action Plan.

Comment: #047_10-19-18_Jaime Colón Malavé

If other, please explain:

“Fixing the house. Fixing the road. I have limited access to basic necessities.”

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“The house had a lot of damage and the assistance received is not enough to rebuild the house.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. Information currently available regarding infrastructure programs is available in the Action Plan.

Comment: #048_10-19-18_Griselle Bermúdez García

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“I’m a Municipal Lawmaker, I’m indicating the great need about the community issues mentioned before. House reconstruction. Unsafe structures. People who need to return to their homes.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #049_10-19-18_Deborah Rivera Rosa

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

“Broken light poles and park and common area maintenance. Structure repair. Maintenance and debris removal. Pest control.”

Additional Comments:

“We need improvements in the water evacuation area and river system.”

PRDOH Response: These needs have informed PRDOH during the development of the Infrastructure Programs. Information currently available regarding infrastructure programs is available in the Action Plan.

Comment: #050_10-19-18_Jacob Adorno Rivera

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

“I have some need of construction inside my house. Finish rebuilding the inside of my house. To deal with the street situation. To deal the abandoned structures.”

Additional Comments:

NA

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. Information currently available regarding infrastructure programs is available in the Action Plan.

Comment: #051_10-19-18_Yarilin Colón Rodríguez

If other, please explain:

“My business was totally flooded and I lost equipment to be able to recover. Sewing machine equipment.”

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“I need help for my mortgage and my husband’s work capacity doesn’t let us move forward.”

PRDOH Response: Information about the Mortgage Catch-up Program, the Small Business Financing, and Small Business Incubators and Accelerators is outlined in the Action Plan.

Comment: #052_10-19-18_Ildefonso Pesante Ortiz

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“Good morning, the CDBG-DR 2018 program funds that will benefit police officers throughout Puerto Rico includes municipal police officers in the island under the funds assigned. Where can the police officers go for guidance? From who would they receive the assistance directly? Would the assistance received conflict with other federal assistance?”

PRDOH Response: The Homebuyer Assistance Program provides eligible applicants with closing cost assistance, down payment assistance, or a soft-second mortgage to assist in purchase of a home. Information regarding how and where to apply will be posted to www.cdbg-dr.pr.gov when it becomes available.

Comment: #053_10-19-18_Lydia E. Ortiz Rosado

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

“My house has a landslide close to a column and it’s cracked. I need help with rebuilding it and to know if it’s livable for the next hurricane.”

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #054_10-19-18_José A. Miranda Miranda

If other, please explain:

“Roads.”

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

NA

PRDOH Response: The Strategic Projects and Commercial Development program, Economic Development Investment Portfolio for Growth, and the Critical Infrastructure Resilience Program outline recovery efforts for damaged infrastructure. Information about these programs can be found in the Action Plan.

Comment: #055_10-19-18_Namir Torres Aquino

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"The structure of my house is in cement. 25% of the roof is in zinc and the other 75% is under a tarp. Cement roof."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas.

Comment: #056_10-19-18_Hector E. Pietri Rivera y Nancy Gutiérrez Rosario

If other, please explain:

"Debris, flying objects around the neighbors' backyards (zinc)... lighting poles affects our public safety. Roof structural damage, walls, floor. Electricity to part of the structure; hallway, balcony, kitchen... Water is erratic."

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"FEMA only provided a lower amount, which covered some windows and doors. Parcelas Mariani without total water services several days a week usually from 7-8 PM until 4 AM, the rest of the week, low water pressure. Most people in our community are elderly or people with disabilities."

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and

provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. Information currently available regarding infrastructure programs is available in the Action Plan.

Comment: #057_10-19-18_Willi Costa Vega

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"My question is when will I receive my property title that I need so much? Thank you. Very kind."

PRDOH Response: The Title Clearance program outlines opportunities for homeowners to receive title clearance assistance.

Comment: #058_10-19-18_Anonymous 4 (Caguas)

If other, please explain:

"Housing need"

Of the three items selected above, what are your top priorities?

"Access to electricity. Access to water. Roads are damaged and impassable."

Additional Comments:

NA

PRDOH Response: The Home Repair, Reconstruction or Relocation program is geared toward serving low- and moderate-income households, prioritizes elderly applicants and provides assistance to eligible homeowners to repair or reconstruct homes in place and offers voluntary relocation assistance for homeowners with storm-damaged properties in hazard-prone areas. Information currently available regarding infrastructure programs is available in the Action Plan.

Comment: #059_10-19-18_Anonymous 5 (Caguas)

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"Potable water. Road in terrible conditions. Rte 765 in bad conditions."

Additional Comments:

NA

PRDOH Response: Information currently available regarding infrastructure programs is available in the Action Plan. Infrastructure programs outlined in the Action Plan aim to address a multitude of infrastructure needs through a coordinated funding match with FEMA, when applicable.

Comment: #060_10-19-18_Anonymous 6 (Caguas)

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"Potable water. Road in terrible conditions. Rte 765 in bad conditions."

Additional Comments:

NA

PRDOH Response: Information currently available regarding infrastructure programs is available in the Action Plan. Infrastructure programs outlined in the Action Plan aim to address a multitude of infrastructure needs through a coordinated funding match with FEMA, when applicable.

Comment: #061_10-19-18_Anonymous 7 (Caguas)

If other, please explain:

"7 months without power."

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

NA

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #062_10-19-18_Juana Rivera Figueroa

If other, please explain:

"A room got wet and the bed, water came during when the hurricane."

Of the three items selected above, what are your top priorities?

"A position bed. Linens. A chest of drawers."

Additional Comments:

NA

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for repair or reconstruction of homes damaged by Hurricanes Irma and Maria or assistance to voluntarily relocate out of hazard-prone areas.

Comment: #063_10-19-18_Anonymous 8 (Caguas)

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"Medical equipment, clothes, food, transportation..."

Additional Comments:

NA

PRDOH Response: Thank you for your comments. PRDOH will take these concerns into consideration during further development of programs outlined in the Action Plan or during development of new programs, if additional funding becomes available.

Comment: #064_10-19-18_Jose R. Acosta Torres

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"Home. Electricity. Water."

Additional Comments:

"I don't have a roof for my wife and children. No electricity or water."

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for repair or reconstruction of homes damaged by Hurricanes Irma and Maria or assistance to voluntarily relocate out of hazard-prone areas. The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #065_10-19-18_Anonymous 9 (Caguas)

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"My house was damaged. The roof broke and there are leaks. The power goes out at all times and the appliances break down. The water, when the power goes out, we don't have water."

Additional Comments:

"We don't have communication service. We don't have telephone service since the hurricane and we're a neighborhood far from Caguas."

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for repair or reconstruction of homes damaged by Hurricanes Irma and Maria or assistance to voluntarily relocate out of hazard-prone areas. The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #066_10-19-18_Anonymous 10 (Caguas)

If other, please explain:

"The roads are filled with trees, there's no illumination."

Of the three items selected above, what are your top priorities?

"I don't have electricity. Only two outlets work."

Additional Comments:

"I still have a tarp on my house. My mental health is affected because of the condition of the house."

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for repair or reconstruction of homes damaged by Hurricanes Irma and Maria or assistance to voluntarily relocate out of hazard-prone areas. The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #067_10-19-18_Enrique Pérez Flores

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"Potable water. Electricity. Job."

Additional Comments:

"Main road and municipal roads are totally deteriorated."

PRDOH Response: Information about the Home Repair, Reconstruction or Relocation Program, the Community Energy Resilience and Water Installations program, and Infrastructure Programs is outlined in the Action Plan.

Comment: #068_10-19-18_Anonymous 11 (Caguas)

If other, please explain:

"Education, the schools are closed."

Of the three items selected above, what are your top priorities?

"Access to water. Electricity. Education."

Additional Comments:

NA

PRDOH Response: Information about the Home Repair, Reconstruction or Relocation Program, the Community Energy Resilience and Water Installations program, Economic Recovery Programs, including the Workforce Training program and Infrastructure Programs is outlined in the Action Plan.

Comment: #069_10-19-18_Anonymous 12 (Caguas)

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"Work. Roads in terrible conditions. Health dispensaries do not exist."

Additional Comments:

"Roads. On Rte 765 needs cleaning and to place safety barriers because of a landslide on KM 11.0 Lomas del Viento sector."

PRDOH Response: Economic Recovery Programs, including the Workforce Training program and Infrastructure Programs is outlined in the Action Plan.

Comment: #070_10-19-18_Anonymous 13 (Caguas)

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"Problems with electricity. Problems with water. And the roads."

Additional Comments:

NA

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #071_10-19-18_Anonymous 14 (Caguas)

If other, please explain:

"I have a landslide in front of my house and leaks in my home. And telephone communications. We don't have any."

Of the three items selected above, what are your top priorities?

"Landslide in front of my house. Leaks in my home. Roads."

Additional Comments:

NA

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for repair or reconstruction of homes damaged by Hurricanes Irma and Maria or assistance to voluntarily relocate out of hazard-prone areas. Information about the Home Repair, Reconstruction or Relocation Program and Infrastructure Programs is outlined in the Action Plan.

Comment: #072_10-19-18_Anonymous 15 (Caguas)

If other, please explain:

"Leaks, landslides, communications."

Of the three items selected above, what are your top priorities?

"Damage to my house. Electricity, water, telephone. The roads are terrible."

Additional Comments:

NA

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for repair or reconstruction of homes damaged by Hurricanes Irma and Maria or assistance to voluntarily relocate out of hazard-prone areas. Information about the Home Repair, Reconstruction or Relocation Program and Infrastructure Programs is outlined in the Action Plan.

Comment: #073_10-19-18_Anonymous 16 (Caguas)

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"Electricity. Roads deteriorated."

Additional Comments:

NA

PRDOH Response: The Strategic Projects and Commercial Development program, Economic Development Investment Portfolio for Growth, and the Critical Infrastructure Resilience Program outline recovery efforts for damaged infrastructure. Information about these programs can be found in the Action Plan.

Comment: #074_10-19-18_Anonymous 17 (Caguas)

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"Housing. Electricity."

Additional Comments:

NA

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for repair or reconstruction of homes damaged by Hurricanes Irma and Maria or assistance to voluntarily relocate out of hazard-prone areas. Information about the Home Repair, Reconstruction or Relocation Program and Infrastructure Programs is outlined in the Action Plan.

Comment: #075_10-19-18_Anonymous 18 (Caguas)

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"Electricity. Water. Roads. The weeding is too heavy."

Additional Comments:

"We have many filtration problems in the house."

PRDOH Response: Information about the Home Repair, Reconstruction or Relocation Program, the Community Energy Resilience and Water Installations program, and Infrastructure Programs is outlined in the Action Plan.

Comment: #076_10-19-18_Anonymous 19 (Caguas)

If other, please explain:

NA



Of the three items selected above, what are your top priorities?

"The electricity in my house has had many malfunctions. We frequently don't have water. Our chests of drawers were completely damaged."

Additional Comments:

NA

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #077_10-19-18_Anonymous 20 (Caguas)

If other, please explain:

"Even though we have public transportation, we don't know until when."

Of the three items selected above, what are your top priorities?

"My house was destroyed. I'm living with my sick sister in house someone lent us. The power goes out frequently. The roads are terrible."

Additional Comments:

"My brother and I are elderly and our house was completely destroyed."

PRDOH Response: Information about the Home Repair, Reconstruction or Relocation Program and the Infrastructure Programs is outlined in the Action Plan.

Comment: #078_10-19-18_Saturniva Fontáñez Cotto

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"The power goes out a lot and the appliances break down. Abandoned houses. Vermin."

Additional Comments:

"Because of lack of financial resources my house has not been painted and because it's on a cliff, it's prone to landslides."

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for repair or reconstruction of homes damaged by Hurricanes Irma and Maria or assistance to voluntarily relocate out of hazard-prone areas. The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #079_10-19-18_Anonymous 21 (Caguas)

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"Transportation. Employment. Home."

Additional Comments:

NA

PRDOH Response: Information about the Housing, Economic Recover, and Infrastructure Programs can be found in the action plan.

Comment: #080_10-19-18_Anonymous 22 (Caguas)

If other, please explain:

"Loss of clothing, appliances, furniture."

Of the three items selected above, what are your top priorities?

"Clothes. Appliances. Furniture."

Additional Comments:

NA

PRDOH Response: Currently available information for the Home Repair, Reconstruction or Relocation program, including the home rehabilitation description, is outlined in the Action Plan.

Comment: #081_10-19-18_Anonymous 23 (Caguas)

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"Transportation. Electricity. Housing."

Additional Comments:

NA

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for repair or reconstruction of homes damaged by Hurricanes Irma and Maria or assistance to voluntarily relocate out of hazard-prone areas. The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #082_10-19-18_Anonymous 24 (Caguas)

If other, please explain:

"Road edges or roads covered by weeds."

Of the three items selected above, what are your top priorities?

"My house had damaged."

Additional Comments:

NA

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for repair or reconstruction of homes damaged by Hurricanes Irma and Maria or assistance to voluntarily relocate out of hazard-prone areas.

Comment: #083_10-19-18_Ana M. Sánchez

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"Water service. Power. Better roads."

Additional Comments:

NA

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #084_10-19-18_Jonás Sánchez González

If other, please explain:

NA

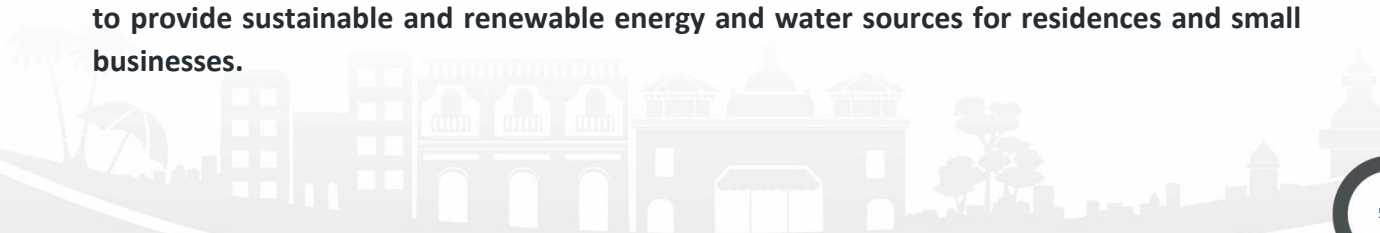
Of the three items selected above, what are your top priorities?

"Water. Power. Roads."

Additional Comments:

NA

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.



Comment: #085_10-19-18_Angel L. Gonzalez Collazo

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"Water. Electricity. Roads."

Additional Comments:

NA

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #086_10-19-18_Anonymous 25 (Caguas)

If other, please explain:

"The roads are full of weeds and impassable."

Of the three items selected above, what are your top priorities?

"The roads are damaged. My business lost clients. I've lost income because I had to close my business."

Additional Comments:

NA

PRDOH Response: The Small Business Financing program provides eligible small businesses with loan or grant funding. Information regarding infrastructure programs is outlined in the Action Plan.

Comment: #087_10-19-18_Eric Yadiel Rosario Cruz

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"House. Food. Power."

Additional Comments:

NA

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for repair or reconstruction of homes damaged by Hurricanes Irma and Maria or assistance to voluntarily relocate out of hazard-prone areas. The Community Energy and

Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #088_10-19-18_Omar Yandel Rosario

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"Food. House. Power."

Additional Comments:

NA

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for repair or reconstruction of homes damaged by Hurricanes Irma and Maria or assistance to voluntarily relocate out of hazard-prone areas. The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #089_10-19-18_Emanuel Rosario Molina

If other, please explain:

"At present, access to the internet is crucial in the work and education areas. Currently access to the internet is complicated. The power outages happen too frequently."

Of the three items selected above, what are your top priorities?

"I don't have enough Access to power (it's constantly going out). My house was damaged. The roads in my area are damaged."

Additional Comments:

NA

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses. Information regarding infrastructure programs is outlined in the Action Plan.

Comment: #090_10-19-18_Eric O. Rosario Molina

If other, please explain:

"I didn't receive any type of assistance from FEMA".

Of the three items selected above, what are your top priorities?

"My home. Power. Food."

Additional Comments:

NA

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for repair or reconstruction of homes damaged by Hurricanes Irma and Maria or assistance to voluntarily relocate out of hazard-prone areas. The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses. Residents who were denied assistance by FEMA may be eligible to receive assistance from PRDOH programs.

Comment: #091_10-19-18_ Carmen M. Fonseca Torres

If other, please explain:

"We have a big need for street lights since the few we had were damaged during Hurricane Irma and María."

Of the three items selected above, what are your top priorities?

"Roads. Street lights. Landscaping."

Additional Comments:

"As mentioned before, we have a lack of lack from the Aqueduct Authority and frequent power outages that damage appliances."

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #092_10-19-18_ Ernesto Rios de Jesús

If other, please explain:

"Street lights and telephone service which was damaged during the hurricanes."

Of the three items selected above, what are your top priorities?

"Street lights. Roads. Landscaping."

Additional Comments:

"Among other needs, we have as mentioned before a lack of water from the Aqueduct Authority and power. Power is partial because we have frequent outages."

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #093_10-19-18_ Anonymous 26 (Caguas)

If other, please explain:

"Lack of power. Lack of water."

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

NA

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #094_10-19-18_ Anonymous 27 (Caguas)

If other, please explain:

"I was unemployed for 10 months since the facilities where I work were destroyed".

Of the three items selected above, what are your top priorities?

"Power – The service is constantly interrupted. Roads – because of the roads I've had to buy 4 tires this year. Home – My house has leaks in the carport and all the balcony was blown away".

Additional Comments:

"I applied for FEMA assistance, but they didn't give me any because the inside of the house was not damaged."

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #095_10-19-18_ Anonymous 28 (Caguas)

If other, please explain:

"We lack facilities in the community to support approximately 750 families. The court and the Búque are destroyed."

Of the three items selected above, what are your top priorities?

"We have frequent power outages, the appliances break down. The road and weeding are in terrible conditions. There are houses that are unsafe, have leaks, etc. There's no potable water."

Additional Comments:

"I don't know why the power voltage goes down or too often we simply don't have any. Right now I don't have anyone sick in my home but there are neighbors with health issues, besides children."

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #096_10-19-18_ Anonymous 29 (Caguas)

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"My house has a landslide very close at the back of the house."

Additional Comments:

NA

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for repair or reconstruction of homes damaged by Hurricanes Irma and Maria or assistance to voluntarily relocate out of hazard-prone areas.

Comment: 097_10-19-18_ Anonymous 30 (Caguas)

If other, please explain:

"Power was out for a long period of time after it was restored, the outages are constant. The roads have too much damage."

Of the three items selected above, what are your top priorities?

"Power. Potable water. Roads."

Additional Comments:

"I have to go to town to get the children because they closed the school and I also have to consistently go to town because the power goes out and the children's homework is via internet and the service also goes out constantly."

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #098_10-19-18_ Carmen J. Perez

If other, please explain:

"Better road maintenance, Power Service."

Of the three items selected above, what are your top priorities?

"Power. Roads. Road maintenance."

Additional Comments:

"We need make improvements for the environment, that's why we need renewable energy."

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #099_10-19-18_Anonymous 31 (Caguas)

If other, please explain:

"We were 7 months without power."

Of the three items selected above, what are your top priorities?

"Power. Roads. Road maintenance."

Additional Comments:

"We need to look for renewable energy alternatives that don't harm the environment."

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #100_10-19-18_Cándido Rivera Vega

If other, please explain:

"The street lights are not fixed, the streets are extremely dark and dangerous."

Of the three items selected above, what are your top priorities?

"Fix street lights. Repair the roads."

Additional Comments:

NA

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #101_10-19-18_Feliciano Rodríguez Domínguez

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"8 months without power; fuel expenses. Damaged appliances. Landslides that cause Access problems. Distance from the mall made the access to products difficult."

Additional Comments:

"The residential telephone service has not been fixed."

PRDOH Response: The Community Energy and Water Resilience Installations program aims to provide sustainable and renewable energy and water sources for residences and small businesses.

Comment: #102_10-19-18_Anonymous 32 (Caguas)

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"The streets of Borinquen Valley (urbanization in Bo. Borinquen) are very deteriorated, almost impassable".

Additional Comments:

NA

PRDOH Response: Information about the Critical Infrastructure Resilience Program and other infrastructure programs can be found in the Action Plan.

Comment: #103_10-19-18_Glenda Viera

If other, please explain:

"The municipalities suffered damage in every aspect."

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"We have to belong to all the assistance committees."

PRDOH Response: PRDOH understands the expertise municipios have concerning the needs of local communities and as such, values the participation of all municipios and looks forward to a working relationship at the municipal level throughout the life of the grant.

Comment: #104_10-19-18_Miguel Rivera (Grupo HIMA San Pablo)

If other, please explain:

"Hospitals are in urgent need of financial support to promote economic development. And services."

Of the three items selected above, what are your top priorities?

"Recover employees. Their sale of specialized services."

Additional Comments:

NA

PRDOH Response: Economic recovery programs are outlined in the Action Plan.

Comment: #105_10-19-18_Anabel Irizzary (Grupo HIMA San Pablo)

If other, please explain:

"My business is damaged."

Of the three items selected above, what are your top priorities?

"Physical structure needs to be repaired to continue providing basic and specialized services."

Additional Comments:

NA

PRDOH Response: The Small Business Financing program offers loans or grants to eligible small businesses.

Comment: #106_10-19-18_Grupo HIMA San Pablo

If other, please explain:

"Medical services. Infrastructure."

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

NA

PRDOH Response: The Strategic Projects and Commercial Development program, Critical Infrastructure Resilience Program, and other infrastructure programs are outlined in the Action Plan.

Comment: #107_10-19-18_Glenda Serrano Negrón

If other, please explain:

NA

Of the three items selected above, what are your top priorities?

"Main need are improvements to home. Building walls to people in flood zones. Place (rental) while construction is completed."

Additional Comments:



"The municipality of Florida has little financial resources and most of their projections are with CDBG funds."

PRDOH Response: The Home Repair, Reconstruction, or Relocation Program outlines opportunities for repair or reconstruction of homes damaged by Hurricanes Irma and Maria or assistance to voluntarily relocate out of hazard-prone areas. Economic recovery initiatives are outlined in the Action Plan.

Comment: #108_10-19-18_ Rubén R. Solla Rosario

If other, please explain:

"For sexual orientation and gender identity discrimination".

Of the three items selected above, what are your top priorities?

NA

Additional Comments:

"Food sovereignty, agriculture, identifying the real needs before building malls. Problem with public transportation system."

PRDOH Response: PRDOH is committed to leading a non-discriminatory recovery effort. Programs outlined in the Action Plan are driven by needs identified in the unmet needs assessment.

Comment: #109_10-19-18_ Manuel González Figueroa

If other, please explain:

"Please consider the beach recovery project with a priority on Rincón".

Of the three items selected above, what are your top priorities?

"Beach recovery project for Rincón. Rain runoff control project in Rincon. Flood prevention project for Rincón."

Additional Comments:

NA

PRDOH Response: Municipal projects, like those highlighted in this comment, may be eligible for assistance under the City Revitalization program, which establishes a fund for municipios to enable a variety of critical recovery activities aimed at reinvigorating urban centers and key community corridors.





