



DEPARTMENT OF  
**HOUSING**



# **CDBG-MIT**

# **Action Plan**

## **Public Comments**

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## I. Introduction

Public comments related to the Community Development Block Grant – Mitigation (**CDBG-MIT**) Action Plan were received in both English and Spanish during the extended public comment period, which initiated on July 12, 2022, and concluded on August 19, 2022.

For the benefit of the reader, we have summarized the written comments submitted in Spanish and English. The comments cited, in some instances, were rephrased as a result of the translation process. The personal identification information in the comments has been hidden to protect the privacy of the person submitting the comment. To obtain additional information, please refer to the text of the comments submitted.

Citizens may contact PRDOH to request the complete translation of the comments or the alternate ways or formats to access them including the responses provided by PRDOH. The requests can be done:

- By phone at 1-833-234-CDBG or 1-833-234-2324
- By e-mail at: CDBG-MIT@vivienda.pr.gov
- Online at: <http://www.cdbg-dr.pr.gov/contact/> or at <http://www.cdbgdr.pr.gov/contacto/>
- By mail at:

Puerto Rico CDBG-DR/MIT Program  
P.O. Box 21365  
San Juan, PR 00928-1365

## II. Public Comments

001

Comment ID: 07/13/22\_WP\_I\_Dario Rolando Martin / PIRAMID-ALL(1)

*To all of Puerto Rico, I offer my innovative project Casa del Futuro, "PIRAMID-ALL".*

*Basically, it is a pyramidal house, highly resistant to earthquakes and hurricanes, efficient, intelligent (home automation) and self-supplied with renewable energy (solar + wind + solar thermal). -*

*It also has a power charger for electric vehicles, which are soon to arrive on the market.*

*This house is ideal for: Shelters, Rural Hotel, Cabins, social housing, self-sustainable urban residential developments, isolated area or connected to the power grid, mountainous area, rural, Eco Villages, semi-urban, islands, therapeutic use and others.-*

*It is very useful for Distributed Generation and new Prosumers.*

*Publications:*

<https://caribempresarial.com/inspiran-piramides-a-ingeniero-argentino-para-crear-la-casa-del-futuro/>

Comment:

<https://www.elmundo.es/economia/vivienda/2018/01/05/5a4f3d94e2704e414e8b45d1.html>

<https://ecoinventos.com/casa-del-futuro-autosuficiente-piramid-all/>

<http://www.revistaenergia.com/?p=14579>

<http://inneuquen.info/nota-principal/piramid-all-es-la-casa-del-futuro-antisismica-eficiente-y-autosustentable-con-energias-renovables-solar-eolica-termsolar>

<http://www.rionegro.com.ar/propiedades/la-casa-del-futuro-ya-esta-en-neuquen-GF3025239>

[https://www.youtube.com/watch?time\\_continue=9&v=yJGnawB2IS8](https://www.youtube.com/watch?time_continue=9&v=yJGnawB2IS8)  
(TV Channel 9 of Mendoza, Argentina)

<https://www.pv-magazine-latam.com/2018/02/27/un-ingeniero-argentino-crea-la-casa-del-futuro>

*I have registered and approved the patent of this innovative project in several countries, Argentina, Chile, Mexico, Costa Rica, and USA. -*

If this project is of interest to you, or if you need more information, please do not hesitate to contact me.

Greetings

PIRAMID-ALL

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Ing. Civil - Darío R. Martín  
La Pampa- Argentina

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<https://www.piramidall.com>  
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PRDOH  
Response:

Greetings Darío Rolando Martín and PIRAMID-ALL,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial).

PRDOH acknowledges your submitted proposal. It has been recorded and will be taken into consideration during the development of this amendment. The CDBG-MIT funds represent a unique opportunity to implement strategies that will improve Puerto Rico's resiliency against future disaster events.

To learn more about the CDBG-MIT funds, please visit the following website, available in English and Spanish at: <https://cdbg-dr.pr.gov/en/> and <https://cdbg-dr.pr.gov/>, respectively.

002	Comment ID: 07/13/22_WP_I_Silvia Caban Colon(1)
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Comment:

Greetings!!

My name is Silvia Caban Colon and I received help from the R3 program, which I appreciate immensely. I am disabled and receive very little from Social Security. I wanted to know if from that million-dollar allocation to help homeowners in PR an amount could be allocated for the balance of the mortgages of people like me who can barely make the monthly mortgage payment. I only receive ██████████ in social security and my monthly payment is ██████████.

I have very little left over to pay for water, electricity, telephone, and medicines. It is truly hard for me to make my mortgage payment. For this reason, I would like to know if you can help disabled people like me to pay off the mortgage of their home. I hope my case can be addressed. Thank you very much for reading my comment.

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Greetings Silvia Caban Colon,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial).

PRDOH  
Response:

PRDOH does not have programs that provide funding to assist with mortgage payoff, we recommend contacting a housing counseling service provider listed on our website to explore available assistance.

The Housing Counseling information can be found at <https://cdbg-dr.pr.gov/en/housing-counseling/> (English) and <https://cdbg-dr.pr.gov/asesoria-de-vivienda/> (Spanish).

003 | Comment ID: 07/15/22\_WP\_I\_Judith Muñiz Gonzalez(1)

Comment:

*I am eligible R3 my number is [REDACTED] they were going to fix my house or relocate me and since I don't have a property title because where I live the land is not segregated. They forgot me 2 years ago and nothing.*

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Greetings Judith Muñiz Gonzalez,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial).

PRDOH  
Response:

Currently, PRDOH manages the Title Clearance (TC) Program under the CDBG-DR Action Plan for recovery from the disasters caused by Hurricanes Irma and María. This program receives direct referrals from the Home Repair, Reconstruction, or Relocation (R3) Program to assist eligible applicants in acquiring a clear title to proceed with receiving an award under the R3 Program and ensure compliance with local permit requirements for construction in Puerto Rico.

If you wish to know about the status of your case, visit the following link: <https://cdbg-dr.pr.gov/r3/>. Also you can request the status of your case and any other pending application under other programs contacting by email at: [infoCDBG@vivienda.pr.gov](mailto:infoCDBG@vivienda.pr.gov), calling 1-833-234-2324 or TTY 787-522-5950; or by mail at: Puerto Rico CDBG-DR/MIT Program, P.O. Box 21365, San Juan, PR, 00928-1365.

Comment:

*I was one of the victims of Hurricane Maria. They put blue mosquito netting on my ceiling they put a zinc one that the nails are visible even now, I must put buckets to catch the water, which is going through the wall and damages my lights. I asked for help to R3 and they told me that there is no help yet. I am a person with cancer, rheumatoid arthritis, they opened my chest in April I am alone, the only thing I ask is that you help me with my house, it is the only dream I have. My name is Alice Velez & tel [REDACTED]. Address [REDACTED] please is the only thing, that the water does not fall on my face when I sleep and I have to sleep with it next to me so I don't get wet on "martes" (matress).*

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Greetings Alice Vélez,

PRDOH will forward your information to the CDBG-DR Home Repair, Reconstruction, or Relocation team to further understand your situation. If you were unable to apply to the R3 Program, PRDOH has made available a form where citizens can enter their information to be notified of future opportunities and apply if additional funding becomes available. This form is available in Spanish and English at: <https://cdbg-dr.pr.gov/iframes/notifications.html>.

If applied to the R3 Program and wish to know about the status of your case, visit the following link: <https://cdbg-dr.pr.gov/r3/>. Also you can request the status of your case and any other pending application under other programs contacting by email at: [infoCDBG@vivienda.pr.gov](mailto:infoCDBG@vivienda.pr.gov), calling 1-833-234-2324 or TTY 787-522-5950; or by mail at: Puerto Rico CDBG-DR/MIT Program, PO Box 21365, San Juan, PR, 00928-1365.

PRDOH  
Response:

On the CDBG-MIT Action Plan, PRDOH has established the Single-Family Housing Mitigation Program. It focuses on prioritizing mitigation assistance to households that are uninhabitable or are under immediate threat due to damage from recent events. The program offers individual flood and landslide-threatened homeowners the option to investigate the feasibility of elevation of their home, the feasibility of reinforcing the property foundation, or the alternative option of voluntary relocation, as specified in the Action Plan. Specifically, for homeowners who remain with a "blue roof" or in high-risk areas, the SF-MIT Program will have a targeted approach to reach these populations as identified in the CDBG-DR Blue Roof Survey or other means.

Once this program is launched, you may apply to qualify to possibly receive household assistance. For further information on this program and its application details, please visit the PRDOH website where the Program Guidelines for Single-Family Housing Mitigation Program will be posted soon at <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) and (Spanish) <https://cdbg-dr.pr.gov/cdbg-mit/>, respectively.

005

Comment ID: 07/17/22\_WP\_GE\_Departamento de Vivienda\_Pedro J. Cintron Rodriguez(1)

Comment:

*I am interested in the position of Occupational Health and Safety Officer and Section 3 Compliance Officer.*

PRDOH  
Response:

Greetings Pedro Cintrón Rodríguez,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). PRDOH acknowledges your interest in becoming part of the CDBG-DR/MIT team working to achieve a prompt recovery from hurricanes Irma and María, as well as to strengthen the Island's resiliency toward future disaster events.

To apply to any of the positions available, please send us your resume at [infoCDBG@vivienda.pr.gov](mailto:infoCDBG@vivienda.pr.gov). All positions available may also be found on PRDOH's Job Opportunity website page at <https://cdbg-dr.pr.gov/en/job-opportunity/> (English) or <https://cdbg-dr.pr.gov/oportunidad-de-empleo/> (Spanish) with detailed descriptions of the job requirements, respectively.

006

Comment ID: 07/18/22\_WP\_I\_Tatiana Castro Santiago(1)

Comment:

*In the Proposed Mitigation Projects section, they have about 10 projects for the Municipality of Guaynabo that do not include the Sierra Berdecía Community. This community has lost 2 homes because they are structurally compromised due to erosion and/or vertical sinking of land adjacent to the Guaynabo River. I hereby request that the Sierra Berdecía Urbanization be included in the MAG-002 MIT section of the Mitigation Projects of the Municipality of Guaynabo. Attached are documents that support the situation we live in the community of Sierra Berdecía and Colinas de Guaynabo.*

PRDOH  
Response:

Greetings Tatiana Castro Santiago,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). Your comment has been recorded as part of the citizen input for this Action Plan. The Proposed Projects Log item MAG-002 was information gathered and utilized during the preparation of the initial Action Plan. The projects listed in Appendix D serve as an example of potential projects that may apply under the CDBG-MIT Programs.

However, please be aware that once the programs are launched, this project may be submitted to the CDBG-MIT Programs to be considered



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and receive funds for assistance. The projects will be evaluated by PRDOH prior to receiving any funds.

Details of the process to apply for funding will be outlined in the Program Guidelines for each Program. Please visit the PRDOH website at <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) and (Spanish) <https://cdbg-dr.pr.gov/cdbg-mit/> to stay up to date on any information or updates related to this Action Plan.

007 | Comment ID: 10/22/20\_WP\_I\_Iris Bonilla(1)

Comment:

Greetings, I was the recipient of my home's repairs, (which I appreciate from the bottom of my heart) what I want to explain is that my refrigerator has mold on the freezer door and can fall because it has 15 years of use and cools little and as much as I explained to the people who came they focused on the roof, doors in the end of deteriorating conditions [sic], the same as my solar water heater is no longer working and I had to buy a shower heater but my electric receipt has gone up a lot and what I receive is a social security check and coupons and you have evidence of all this, I have the condition of [REDACTED] so I have to have a strict diet because otherwise I activate my [REDACTED], in short I beg you to help me for a refrigerator and solar heater because with that I live what is left of my life happily, THANK YOU for everything and BLESSINGS my case number in R3 [REDACTED] and in Cewri [REDACTED] I was assigned and waiting for you to come to check and assign me the panels and tank, I hope you can help me and THANK YOU very much for all your help, Blessings and I hope your usual help, Blessings, atfe, Iris Bonilla

PRDOH  
Response:

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Greetings Iris Bonilla,

PRDOH is glad the R3 Program was able to provide home assistance. We understand you have remaining additional needs. As established in the CDBG-DR Action Plan, the Community Energy and Water Resilience Installations (**CEWRI**) Program is meant to work with and complement the R3 Program. The CEWRI Program is designed to provide energy and water efficiency and resiliency installations to eligible projects being rehabilitated, reconstructed, or new construction under the R3 Program.

If you wish to know about the status of your case, visit the following link: <https://cdbg-dr.pr.gov/r3/>. Also you can request the status of your case and any other pending application under other programs contacting by email at: [infoCDBG@vivienda.pr.gov](mailto:infoCDBG@vivienda.pr.gov), calling 1-833-234-2324 or TTY 787-522-5950; or by mail at: Puerto Rico CDBG-DR/MIT Program, P.O. Box 21365, San Juan, PR, 00928-1365.

008 | Comment ID: 07/20/22\_WP\_I\_Wanda I. Rivera Diaz(1)

Comment:

*Hello greetings, I need your help urgently as my home has the roof and several things damaged and is not fit to live in if you can help me, I would appreciate it please contact [REDACTED] Wanda*

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Greetings Wanda I. Rivera,

PRDOH  
Response:

Thank you for submitting your comment. PRDOH recommends contacting a housing counseling service provider listed on our website to explore available assistance from our programs. The information can be found at <https://cdbg-dr.pr.gov/en/housing-counseling/> (English) and <https://cdbg-dr.pr.gov/asesoria-de-vivienda/> (Spanish).

To learn more about the CDBG-MIT funds, go to the following websites, which are available in English and Spanish, respectively: <https://cdbg-dr.pr.gov/en/> and <https://cdbg-dr.pr.gov/>.

009 | Comment ID: 07/20/22\_WP\_I\_Kaisa Nieves Pabon(1)

Comment:

*Wendolyn thanks for the invitation to comment. But as I openly said in CAC whatsapp and Email LCDO WILLIAM just paper and ink. NONE OF THIS IS THE REAL THING IN PRACTICE ONLY FRAUD ON FRAUD AND VIOLATION CIVIL AND HUMAN RIGHTS and fine human treatment [sic] of citizens, you're only the smokescreen of the DF. Federal \$ [sic] that are only used to damage families abusing their disabilities and needs.*

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Greetings Kaisa Nieves Pabon,

PRDOH  
Response:

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). As the grantee of the CDBG-DR and CDBG-MIT allocations, PRDOH is responsible for the adequate management of the federal funds provided by the U.S. Department of Housing and Urban Development (HUD). To prevent any fraud, waste, abuse, or mismanagement, PRDOH has established the Anti-fraud, Waste, Abuse, or Mismanagement (AFWAM) Policy, which details more in-depth the processes needed to be followed to report and rectify these unlawful acts. The policy is available in English and Spanish at <https://cdbg-dr.pr.gov/en/download/afwam-policy/> and <https://cdbg-dr.pr.gov/download/politica-afwam/>.

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If you know or suspect that someone has committed fraud, waste, abuse, or mismanagement related to the CDBG-DR and CDBG-MIT Programs please visit PRDOH's website at <https://cdbg-dr.pr.gov/app/cdbgdrpublic/Fraud> (English) or <https://cdbg-dr.pr.gov/app/cdbgdrpublic/Fraud/IndexES> (Spanish) to complete an official form. This form can also be submitted through e-mail, post, mail, or in person.

010 | Comment ID: 07/22/22\_WP\_I\_carmen fonseca(1)

Comment: *An action plan that will be very useful for people in need.*

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Greetings Carmen Foncesca,

PRDOH  
Response:

Thank you for your comment in support of the CDBG-MIT Action Plan Amendment 1 (Substantial). It has become part of the public comment record. The CDBG-MIT funds represent a unique opportunity to implement strategies that will improve Puerto Rico's resiliency against future disaster events. For further information, please visit PRDOH website at <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) and <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish), and subscribe to the news section to receive notifications on the latest information on the CDBG-MIT funds.

011 | Comment ID: 10/30/20\_WP\_I\_Jansy(1)

Comment: *I have been waiting for years for an answer to the contribution that to this day has not been responded.*

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Greetings Jansy,

This public comment does not provide sufficient information to develop a response. Nevertheless, if you are interested in the CDBG-MIT Program, please refer to the information below:

PRDOH  
Response:

While CDBG-DR funding is focused on disaster recovery, CDBG-MIT will provide funding to support activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage or loss of property, suffering, and hardship, to lessen the impact of future disasters.

To stay up-to-date on any information or updates related to the CDBG-MIT funds, please visit PRDOH's webpage at: <https://cdbg->

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[dr.pr.gov/en/cdbg-mit/](https://dr.pr.gov/en/cdbg-mit/) (English) or <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish), respectively.

012 | Comment ID: 07/26/22\_WP\_I\_Haydee Arbolay(1)

Comment: *It is good.*

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Greetings Haydee Arbolay,

PRDOH  
Response:

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). The CDBG-MIT funds represent a unique opportunity to implement strategies that will improve Puerto Rico's resiliency against future disaster events. To learn more about the CDBG-MIT funds, please visit the following websites <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) and <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish).

013 | Comment ID: 07/26/22\_WP\_I\_IVAN GOMEZ BLASSINO(1)

Comment: *Let me know if there is any help for those of us who have invested our savings into solar panel systems. Thank you.*

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Greetings Ivan Gomez Blassino,

PRDOH  
Response:

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). Currently, PRDOH CDBG-MIT Programs do not offer reimbursement for individuals who have previously invested in solar panel systems.

For individual energy household assistance, PRDOH has established under the CDBG-MIT Action Plan the Home Energy Resilience Improvements Program and the Incentive Program. These programs will be administered under one (1) unified structure referred to in the Program Guidelines as the Community Energy and Water Resilience Installations—Household (CEWRI—HH) Program. The Home Energy Resilience Improvements Program will evaluate the household's energy needs to provide a solution based on resilient design and improvement projects. The maximum award under this subprogram is \$30,000. Under the Incentive Program, an applicant could be eligible to a maximum award of \$20,000 or a

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designated percentage of the household project costs to install a renewable energy system.

Please visit the PRDOH website for more information, where the Program Guidelines for the CEWRI-HH Program will be posted once the program is launched, at <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programmaticas/> (Spanish).

014 | Comment ID: 07/26/22\_WP\_I\_luis a. aviles valentin(1)

Comment:

*According to the government's project, in appendix H no. 13, it says to provide sustainable energy assistance to low-income people. I applied for it and was denied, saying that it was for hurricane maria. But since when is the money available through FEMA. There is no other agency that can send my case. For example, to the mayor's office of my town, Camuy. It is so much work, it costs so much to help. Or is it that I am not "guineo del gajo".*

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Greetings Luis A. Aviles Valentin,

PRDOH  
Response:

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). The number 13<sup>th</sup> Project included in Appendix H includes a narrative referring to the Incentive Program. The Incentive Program is a subprogram established under the CDBG-MIT Community Energy and Water Resilience Installations Program in the CDBG-MIT Action Plan. The Incentive Program works with the Home Energy Resilience Improvements Program under one (1) unified structure referred to in Program Guidelines as the Community Energy and Water Resilience Installations—Household (CEWRI—HH) Program.

The Home Energy Resilience Improvements Program will evaluate the household's energy needs to provide a solution based on resilient design and improvement projects. The maximum award under this subprogram is \$30,000. Under the Incentive Program, an applicant could be eligible to a maximum award of \$20,000 or a designated percentage of the household project costs to install a renewable energy system.

Please visit the PRDOH website for more information on the application process, where the CEWRI-HH Program Guidelines will be posted once the program is launched: <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programmaticas/> (Spanish).

015 | Comment ID: 07/27/22\_WP\_I\_Maralice (1)

Comment: *I need help for my house I have two asthmatic children and my house was named inflated [sic] to live after the earthquakes.*

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Greetings Maralice,

Currently, PRDOH is responsible for administering the Home Seismic Rehabilitation and Reconstruction (SR2) Program designed to assist homeowners in repairing damaged homes or rebuilding substantially damaged homes in place.

PRDOH  
Response:

For further information on the Home Seismic Rehabilitation and Reconstruction (SR2) Program, the CDBG-DR Earthquake Recovery Response Action Plan is available in English and Spanish at <https://cdbg-dr.pr.gov/en/download/action-plan-for-the-2019-2020-earthquakes-recovery-response-dr-4473-pr/> and <https://cdbg-dr.pr.gov/download/plan-de-accion-para-la-recuperacion-en-respuesta-a-los-terremotos-2019-2020-dr-4473-pr/>.

016 | Comment ID: 07/27/22\_WP\_I\_Christian pagan Figueroa(1)

Comment: *Greetings one question is that the house where I live was affected by hurricane maria but they could not help me because I am not the owner I am the grandson but I am heir because the owner who is my grandfather and my mother died and I live in the house for more than 9 years could I qualify having the deeds of the house. Thank you very much*

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Greetings Christian Pagan Figueroa,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). Currently, PRDOH manages the Title Clearance (TC) Program under the CDBG-DR Action Plan for recovery from the disasters caused by Hurricanes Irma and María.

PRDOH  
Response:

This program receives direct referrals from the Home Repair, Reconstruction, or Relocation (R3) Program to assist eligible applicants in acquiring a clear title to proceed with receiving an award under the R3 Program and ensure compliance with local permit requirements for construction in Puerto Rico. As established in the Program Guidelines, this program helps disaster-affected homeowners to access federal assistance resources currently available and removes a major barrier to accessing similar funds in future disasters.

To obtain more information about the CDBG-DR Title Clearance (TC) Program and its eligibility requirements, you may refer to the Program Guidelines, available in English and Spanish at: <https://cdbg-dr.pr.gov/en/download/title-clearance-program/> and <https://cdbg-dr.pr.gov/download/programa-de-autorizacion-de-titulos/>, respectively.

017 | Comment ID: 07/28/22\_WP\_I\_Felix Diaz(1)

Comment: *Low-income people should be given consideration to participate in solar panels even if they have not participated in the repair of homes.*

Greetings Felix Diaz,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). According to the Federal Register Vol. 84 No. 169 (August 30, 2019) 84 FR 45838, PRDOH must prioritize the protection of low-and-moderate income (LMI) individuals through the proposed mitigation programs and projects. As the Grantee for the CDBG-MIT funds, PRDOH is committed to implementing programs and projects will benefit the most needed communities on Puerto Rico.

PRDOH  
Response:

As part of the CDBG-MIT Portfolio, PRDOH has designed the Home Energy Resilience Improvements Program, which is a subprogram under the CDBG-MIT Community Energy and Water Resilience Installations Program. The Home Energy Resilience Improvements Program focuses on conducting a home energy evaluation and the promotion of energy efficiency and stability. The resilient design and improvements to these homes may include the installation of photovoltaic systems, solar generators, and battery storage at capacities aligned with household needs, including the consideration of critical medical needs.

For further information on this program, please visit the PRDOH website where the Program Guidelines for Home Energy Resilience Improvements Program will be posted once the program is launched, <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programaticas/> (Spanish), respectively.

018 | Comment ID: 07/28/22\_E\_I\_Arnaldo López(1)

Comment: *Greetings. What are the possibilities of having the funds for a construction since there are no houses. I have the lot paid and I would like your help.*

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Greetings Arnaldo Lopez,

PRDOH  
Response:

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). The CDBG-MIT Action Plan does not provide assistance for construction activities for new properties. However, PRDOH does manage the Homebuyer Assistance Program (HBA) under the CDBG-DR Action Plan for the recovery of the disaster caused by Hurricanes Irma and María. The HBA Program is intended to assist eligible first-time homebuyers with the process of acquiring their first property.

To obtain more information about the CDBG-DR Homebuyer Assistance Program and its eligibility requirements, you may refer to the HBA Program Guidelines, available in English and Spanish on the PRDOH website at: <https://cdbg-dr.pr.gov/en/download/homebuyer-assistance-program-2/> and <https://cdbg-dr.pr.gov/download/programa-de-asistencia-directa-al-comprador-2/>.

019 | Comment ID: 07/28/22\_E\_I\_Elizabeth Santiago(1)

Comment:

*What truth is there that you can apply for solar panels for people with conditions that need them?*

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Greetings Elizabeth Santiago,

PRDOH  
Response:

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). The PRDOH CDBG-MIT Action Plan offers the Community Energy and Water Installations Program, which will offer applicants PV systems with battery backup.

For further information, please visit the PRDOH website where the Program Guidelines for CDBG-MIT Community Energy and Water Resilience Installations will be posted once the program is launched, <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programaticas/> (Spanish).

020 | Comment ID: 07/28/22\_WP\_GE\_Gobierno\_Rob Ramirez Saltares(1)

Comment:

CDBG



PRDOH  
Response:

We do not have sufficient information to develop a response. Nevertheless, thank you for participating. To stay up-to-date on any information or updates related to the CDBG-MIT funds, please visit PRDOH's webpage at: <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) or <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish).

021 | Comment ID: 11/05/20\_WP\_I\_Pedro Perez(1)

Comment:

*It is confusing or ambiguous to use a percentage to calculate the benefit of cases that are elevation. Finally, can these funds be used for uplift? can it be a more specific amount and not a percentage?*

PRDOH  
Response:

Greetings Pedro Perez,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). It will be taken into consideration when reviewing the CDBG-MIT Action Plan Amendment 1 (Substantial). As established on the CDBG-MIT Action Plan, applicants may be considered for elevation through the Single-Family Housing Mitigation Program when it is required and determined feasible to mitigate future flood risk and protect federal investments. The elevation standards will be applied by PRDOH for residential structures in flood hazard areas where the activity is determined feasible and require the lowest floor of the home to be raised at least two (2) feet above the one percent (1%) annual floodplain elevation.

For further information on this program, please visit the PRDOH website where the Program Guidelines for Single-Family Housing Mitigation Program will be posted once the program is launched, <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programaticas/> (Spanish), respectively.

022 | Comment ID: 08/01/22\_WP\_I\_Furia\_Idalia Cruz Ramos(1)

Comment:

*Why haven't they started the process of installation of Solar Panels...to those of us who worked on the houses for R-3 [REDACTED]?*

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Greetings Furia Idalia Cruz Ramos,

PRDOH  
Response:

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). In the Home Repair, Reconstruction, or Relocation (R3) Program, PRDOH will soon include solar panel installations. This activity will be executed through the Community Energy and Water Resilience Installations (CEWRI) Program, which will receive direct referrals from the R3 Program.

If you wish to know about the status of your case, visit the following link: <https://cdbg-dr.pr.gov/r3/>. Also, you can request the status of your case and any other pending application under other programs contacting by email at: [infoCDBG@vivienda.pr.gov](mailto:infoCDBG@vivienda.pr.gov), calling 1-833-234-2324 or TTY 787-522-5950; or by mail at: Puerto Rico CDBG-DR Program, PO Box 21365, San Juan, PR, 00928-1365.

023 | Comment ID: 08/01/22\_WP\_I\_Claribel Quiñones(1)

Comment:

*My question is, if I am in Chapter 13 bankruptcy, can I buy a house, or get the benefits?*

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Greetings Claribel Quinones,

PRDOH  
Response:

Currently, CDBG-MIT Programs established in the CDBG-MIT Action Plan do not help with purchasing a home. PRDOH CDBG-DR manages the Homebuyer Assistance (HBA) Program, which is focused on assisting homebuyers who do not own a home at the time of application to seek support toward homeownership.

To obtain more information about the CDBG-DR Homebuyer Assistance Program and its eligibility requirements, you may refer to the Program Guidelines, available in (English) at: <https://cdbg-dr.pr.gov/en/download/homebuyer-assistance-program-2/> and (Spanish) <https://cdbg-dr.pr.gov/download/programa-de-asistencia-directa-al-comprador2/>.

024 | Comment ID: 08/01/22\_WP\_I\_martin colon sustache(1)

Comment:

*HELLO,,,,A LONG TIME AGO I APPLIED FOR DISASTER ASSISTANCE FROM MARIA,,,,THEY TOOK INFORMATION FROM ME AND NEVER LEFT ME A COMMENT,,,ABOUT THE HELP FOR RECONSTRUCTION OF HOUSES,,I THINK IT IS SVJ,,,OR,,,R3 HOUSING,,,SINCE MARIA I COULD NEVER HAVE MY HOUSE AS IT WAS,,,NOW I ONLY HAVE A ROOM IN MY HOUSE ROOFED WITH PANELS BECAUSE I COULD NEVER FINISH IT, I ONLY HAVE A SOCIAL SECURITY ASSISTANCE,,,,AND WHEN I FOUND OUT ABOUT THE HELP TO REBUILD MY*

HOUSE,,WHEN I WENT TO HUMACAO HOUSING,,THEY TOLD ME THAT THEY HAD ALREADY FINISHED,,AND I WAS LEFT AGAIN WITHOUT THE HELP,,NOW I ASK YOU TO PLEASE NOTIFY ME FOR HELP TO REBUILD MY HOUSE,,TO SEE IF YOU CAN HELP ME,,THANK YOU VERY MUCH,,,,,

Greetings Martin Colon Sustache,

PRDOH  
Response:

PRDOH laments your situation and recognizes the urgency of attending the unmet housing needs of Puerto Rican families affected by the hurricanes Irma and María. Currently, the Home Repair, Reconstruction, or Relocation (R3) Program has closed application intake due to reaching its capacity for available funding. However, PRDOH has made available a form where citizens can enter their information to be notified of future R3 opportunities and apply if additional funding becomes available. Furthermore, the CDBG-DR Program will notify of other programs that may be of benefit as future programs are launched. It is important to clarify that this subscription does not constitute a waiting list or any sort of prioritization since all individuals who submit their information will be similarly notified of future opportunities. This form is available in Spanish and English at: <https://cdbg-dr.pr.gov/iframes/notifications.html>.

Additionally, through the Single-Family Housing Mitigation Program established on the CDBG-MIT Action Plan, PRDOH will assist homeowners with immediate threats to their homes, and livelihood. This program offers individual flood and landslide threatened homeowners with the option to investigate the feasibility of elevation of their home, the feasibility of reinforcing the property foundation, or the alternative option for voluntary relocation, as specified in the action plan.

For further information on this program, please visit the PRDOH website where the Program Guidelines for Single-Family Housing Mitigation Program will be posted once the program is launched, <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programaticas/> (Spanish).

025	Comment ID:	08/01/22_WP_I_Brenda Garcia Maldonado(1)
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Comment:

*Good Afternoon  
CDBG has a positive plan for the development of low-income communities and people in Puerto Rico. I only have one constructive criticism that they should also attend to the requests of low-income disabled people who have needs in their own residences. I have personally called and explained my situation due to the damage caused by the earthquakes in my residence and my neighbors and we have not received any help. I hope that through this comment, they will give us the opportunity to be evaluated and if we meet the requirements, they will provide us with the pertinent assistance. Thank you and I hope that you will continue to promote and guide us to the different types of assistance.*

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Greetings Brenda Garcia,

PRDOH  
Response:

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). Currently, PRDOH is responsible for administering the Home Seismic Rehabilitation and Reconstruction (SR2) Program designed to aid to homeowners for the repair of damaged homes or to rebuild substantially damaged homes in place.

For further information on the Home Seismic Rehabilitation and Reconstruction (SR2) Program, CDBG-DR Earthquakes Recovery Response Action Plan is available in English and Spanish at <https://cdbg-dr.pr.gov/en/download/action-plan-for-the-2019-2020-earthquakes-recovery-response-dr-4473-pr/> and <https://cdbg-dr.pr.gov/download/plan-de-accion-para-la-recuperacion-en-respuesta-a-los-terremotos-2019-2020-dr-4473-pr/>.

026

Comment ID: 08/02/22\_WP\_GE\_Municipio de Guayanabo\_Ada E. Bones Berrios(1)

#### Comment

*The Municipality of Guaynabo has been conceptualizing several projects to address the landslide problems of the residents along the embankments of the Guaynabo River. That is why within the MAG-002MIT Project, several communities that present similar problems are included. Due to an involuntary error, the name of the Sierra Berdecía Urbanization, which is part of the project area to be worked, was not included. The amendment to the description and location of the project is included.*

*MAG-002MIT  
Stabilization of the Guaynabo River Embankments*

#### *Description of Project*

Comment:

*In heavy rain, such as the passage of Hurricanes, force and velocity of the water in Guaynabo River causes the slopes of the river to erode substantially creating meanders, especially in the areas where change in flow direction occur, like Colinas and Sierra Berdecía community areas. Due to the level difference between the houses and the river, there is a danger to properties and their residents. In these communities, damage occurred in courtyards of the residences. This project includes repair or relocation of properties in affected area, at the height of the Colinas and surrounding communities.*

#### *Description of Location*

*Sierra Berdecía, Colinas de Guaynabo, Riveras de honduras, Terrazas de Guaynabo, Colimar and Villa Providencia Elderly Home Areas*

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Greetings Municipality of Guaynabo,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). PRDOH acknowledges the receipt of the Municipality of Guaynabo comments. The Proposed Projects Log item MAG-002 has information gathered and utilized during the preparation of the initial Action Plan. The projects listed in Appendix D serve as an example of potential projects that may apply under CDBG-MIT programs.

PRDOH  
Response:

Please understand, that once the programs are launched, this project may be submitted to the CDBG-MIT Program to be considered and receive funds for assistance. The projects will be evaluated by PRDOH prior to receiving any funds.

Details of the process to apply for funding will be outlined in the Program Guidelines for each Program. To stay up-to-date on any information or updates related to this Action Plan, please visit the PRDOH website at <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programaticas/https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish).

027 | Comment ID: 08/03/22\_WP\_martin colon sustache(1)

Comment:

*COULD YOU TELL ME IF WEDNESDAY AUGUST 17 IS THE DATE TO APPLY FOR R3....*

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Greetings Martin Colon Sustache,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). Currently, the Home Repair, Reconstruction, or Relocation (R3) Program has closed application intake due to reaching its capacity for available funding.

PRDOH  
Response:

However, PRDOH has made available a form where citizens can enter their information to be notified of future R3 opportunities to apply if additional funding becomes available. It is important to clarify that this subscription does not constitute a waiting list or any sort of prioritization since all individuals who submit their information will be similarly notified of future opportunities. This form is available in Spanish and English at: <https://cdbg-dr.pr.gov/iframes/notifications.html>

For further information on this program, please visit the PRDOH website where the Program Guidelines for Single-Family Housing Mitigation Program will be posted once the program is launched, <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programaticas/> (Spanish).

028 | Comment ID: 08/03/22\_WP\_I\_Digna M. Cruz Rivera(1)

Comment:

*I only have work for 2 days and my husband has social security I am 60 years old and my husband is 84 we own the house but we owe a lot of electricity and they have not helped me, we called but they tell me that it is for those who live in rented accommodation. [REDACTED], who can help us. [REDACTED]*

Greetings Digna M. Cruz,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial).

PRDOH  
Response:

Currently, PRDOH has the Rent Payment Assistance Program, developed for low-to-moderate (LMI) income renters who live in Puerto Rico and have been economically effective by the pandemic. This program is available to families who need assistance to pay rent, water services, and electricity services.

To obtain information about the Rental Assistance Program and its eligibility requirements, you may refer to the Program website, available in Spanish at: <https://covidrenta.org/Account/Login?ReturnUrl=%2F>

In addition to the website, you can contact PRDOH's Rental Assistance Program by phone: 787-759-1888 and email: [ayuda@covidrenta.org](mailto:ayuda@covidrenta.org), respectively.

029 | Comment ID: 08/04/22\_WP\_NGO\_Break A Difference\_Stephen McMahon(1)

Comment:

*While we're delighted to see so many resources dedicated to resilience and mitigation in the proposed Action Plan, as an organization that has mobilized hundreds of volunteers to help rebuild homes after Hurricane Maria, we've repeatedly seen the lack of resources available to nonprofit organizations working to build back stronger as a barrier to our mobilization of even more resources to help the Island recover. As such, we'd recommend that the action plan be amended to allow for organizations repairing single family homes (not only multifamily homes) be eligible for CDBG-MIT dollars. The inclusion of SF homes would allow many NGOs to pair the resources needed for home repair, with an emphasis on roof repair, with the energy and reduced cost of volunteer labor to repair or rebuild homes with roofs that are much more resilient and prevent damage in future storms.*

*As climate change continues to increase the frequency and the intensity of storms damaging property in Puerto Rico, no meaningful, cost-effective strategy should go untapped. Leveraging resources from the CDBG-MIT program for the repair and reconstruction of single family homes will allow*

*nonprofit organizations and the volunteers they engage to continue to build a stronger, safer array of housing options across the Island.*

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Greetings Stehen McMahon and Break a Difference Organization,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). It has been recorded and will be taken into consideration during the development of this amendment.

PRDOH  
Response:

In the CDBG-MIT Action Plan Amendment 1 (Substantial), PRDOH has established three housing programs: Single-Family Housing Mitigation, Social Interest Housing Mitigation Program, and the Multi-Sector Community Mitigation Program. The Multi-Sector Community Mitigation Program offers community-based redevelopment or relocation to transfer residents from high-risk areas. This Program has been designed to include the Subrecipient Distribution Model, where non-profit entities may apply to participate as one of the Subrecipients responsible for assisting PRDOH with the implementation of the program.

More information on these Programs will be posted as they are launched, on the PRDOH website at <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programaticas/> (Spanish).

030 | Comment ID: 08/08/22\_WP\_I\_NYDIA E RODRÍGUEZ(1)

Comment:

HELLO!  
I DON'T KNOW IF THIS IS THE APPROPRIATE FORUM. I AM INTERESTED IN KNOWING IF YOU OFFER GRANTS FOR THE INSTALLATION OF SOLAR PANELS. I MOVED IN JANUARY AND I PAID AROUND █████ IN LUMA AND I AM ALREADY GOING FOR █████.  
THANK YOU!

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Greetings Nydia E. Rodriguez,

PRDOH  
Response:

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). Within the CDBG-MIT Action Plan, PRDOH has established the Community Energy and Water Resilience Installations Program, which is divided into three (3) subprograms: Home Energy Resilience Improvements, Incentive Program, and Community Installations.

For individual energy household assistance, PRDOH offers the Home Energy Resilience Improvements Program and the Incentive Program, which will be administered under one (1) unified structure referred to in Program Guidelines as the Community Energy and Water Resilience Installations – Household (CEWRI – HH) Program. The Home Energy



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Resilience Improvements Program will evaluate the household's energy needs to provide a solution based on resilient design and improvement projects. The maximum award under this subprogram is \$30,000. Under the Incentive Program, an applicant could be eligible to a maximum award of \$20,000 or a designated percentage of the household project costs to install a renewable energy system.

For further information, please visit the PRDOH website where the Program Guidelines for the CEWRI-HH Program will be posted once the program is launched, <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programaticas/> (Spanish).

031 | Comment ID: 08/10/22\_WP\_I\_Mariana Quinones(1)

Comment: *WE NEED AFFORDABLE HOUSING NOW!!!*

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Greetings Mariana Quinones,

Thank you for participating on the public comment period. In the CDBG-MIT Action Plan Amendment 1 (Substantial), PRDOH has established three housing programs: Single-Family Housing Mitigation, Social Interest Housing Mitigation Program, Multi-Sector Community Mitigation Program.

PRDOH  
Response:

Additionally, PRDOH manages the Homebuyer Assistance (HBA) Program under the CDBG-DR Action Plan, which is focused on assisting homebuyers who do not own a home at the time of application to seek support toward homeownership. The Program utilizes CDBG-DR funds to provide direct assistance to homebuyers to facilitate and expand homeownership through the grant.

PRDOH also administers the CDBG-DR Gap to Low Income Housing Tax Credits Program (LIHTC) designed to provide gap funding for properties being developed with low-income tax credits to increase the inventory of affordable multifamily and elderly rental units.

For further information on the CDBG-MIT and CDBG-DR Programs, please visit the PRDOH website available in English and Spanish at <https://cdbg-dr.pr.gov/en/> and <https://cdbg-dr.pr.gov/>, respectively.

032 | Comment ID: 08/12/22\_WP\_I\_Sandra M. Olivieri Cano(1)



Comments amendment to Part D: Proposed Mitigation Projects for inclusion of the community of Urbanización Sierra Berdecía in Guaynabo in project No. MAG-002MIT.

I hereby submit my comments to include the community of Urbanización Sierra Berdecía in Guaynabo in project number MAG-002MIT. In the proposal of said project, the communities of Colinas de Guaynabo, Riveras de Honduras, Terrazas de Guaynabo, Colimar and Villa Providencia Elderly Home appear as the communities affected by the landslide and erosion in the Guaynabo River and for which this stabilization project is proposed. However, the community of Urbanización Sierra Berdecía does not appear in this list even though I lost my property since 2019 due to the situation with the Guaynabo River.

As of today, due to the situation with the Guaynabo River, two communities have had significant damages and that have been documented by the Municipality and the corresponding government agencies. I am a retired school principal who gave thirty years of my life to public education in this country, I lost my home and to this day the situation has not been addressed, the properties neighboring my former home are at imminent risk in the event of a flood or an atmospheric phenomenon. Our community is one street away from the community of Colinas de Guaynabo and separated by the riverbed from the community of Colimar.

Comment:

In the community of Colinas de Guaynabo there is at least one house at imminent risk, in my community Sierra Berdecía two homes have already been lost, one of them being mine.

I have been in communication with the Planning Office of the Municipality of Guaynabo and its director, planner Ada Bones, who agrees with us that this community should be included in this Plan and who has indicated to me that the Municipality of Guaynabo has taken the corresponding steps to present its comments to this draft making the claim for the inclusion of the Sierra Berdecía Urbanization.

As of today, the case of the property at risk of the Urbanization Colinas de Guaynabo, has funds from the CDBG-DR R3 program of the Department of Housing for relocation. I have not had the same opportunity and have not been able to be relocated so I do not have a roof of my own. In our community we are not losing "houses", here we are losing homes that cost a lot of effort and in my case a life of work in public service and therefore I request that the draft be amended and include us as a community so that the situation can be addressed.

We in the community of Urbanización Sierra Berdecía, and in particular myself, are not asking for special treatment. We are asking to be considered, to be included in the proposed projects so that we can see some solution to our situation.

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Greetings Sandra M. Olivieri Cano,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). The Proposed Projects Log item MAG-002 was information gathered and utilized during the preparation of the initial Action Plan. The projects listed in Appendix D serve as an example of a potential project that may apply under CDBG-MIT Programs.

PRDOH  
Response:

However, please be aware that once the programs are launched, this project may be submitted to one of the CDBG-MIT Programs to be considered to receive funds for assistance. All projects will be evaluated by PRDOH prior to receiving any funds.

Details of the process to apply for funding will be outlined in the Program Guidelines for each Program. To stay up-to-date on any information or updates related to this Action Plan, please visit the PRDOH website at <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) and <https://cdbg-dr.pr.gov/cdbg-mit/https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish).

033 | Comment ID: 08/13/22\_WP\_I\_Wilmarie Miranda Núñez(1)

Comment: *I need a home*

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Greetings Wilmarie Miranda Nunez,

Thank you for participating on the public comment period. In the CDBG-MIT Action Plan Amendment 1 (Substantial), PRDOH has established three housing programs: Single-Family Housing Mitigation, Social Interest Housing Mitigation Program, Multi-Sector Community Mitigation Program.

PRDOH Response:

Additionally, PRDOH manages the Homebuyer Assistance (HBA) Program under the CDBG-DR Action Plan, which is focused on assisting homebuyers who do not own a home at the time of application to seek support toward homeownership. The Program utilizes CDBG-DR funds to provide direct assistance to homebuyers to facilitate and expand homeownership through the grant.

PRDOH also administers the CDBG-DR Gap to Low Income Housing Tax Credits Program (LIHTC) designed to provide gap funding for properties BEING developed with low-income tax credits to increase the inventory of affordable multifamily and elderly rental units.

For further information on the CDBG-MIT and CDBG-DR Programs, please visit the PRDOH website available in English and Spanish at <https://cdbg-dr.pr.gov/en/> (English) and <https://cdbg-dr.pr.gov/> (Spanish).

034 | Comment ID: 08/14/22\_WP\_I\_Jossie Vela(1)

Comment: *Thank you for the CDBGMIT project, it gives the opportunity to not keep paying for another [sic]. But they should have staff to help with the house search, as it has been difficult for me. The majority of houses are not in a condition to move in immediately. THANK YOU.*

Greetings Jossie Vela,

PRDOH  
Response:

Thank you for participating on the public comment period. In the CDBG-MIT Action Plan Amendment 1 (Substantial), PRDOH has established three housing programs: Single-Family Housing Mitigation, Social Interest Housing Mitigation Program, Multi-Sector Community Mitigation Program.

Additionally, PRDOH manages the Homebuyer Assistance (HBA) Program under the CDBG-DR Action Plan, which is focused on assisting homebuyers who do not own a home at the time of application to seek support toward homeownership. The Program utilizes CDBG-DR funds to provide direct assistance to homebuyers to facilitate and expand homeownership through the grant.

PRDOH also administers the CDBG-DR Gap to Low Income Housing Tax Credits Program (LIHTC) designed to provide gap funding for properties being developed with low-income tax credits to increase the inventory of affordable multifamily and elderly rental units.

For further information on the CDBG-MIT and CDBG-DR Programs, please visit the PRDOH website available in English and Spanish at <https://cdbg-dr.pr.gov/en/> (English) and <https://cdbg-dr.pr.gov/> (Spanish).

035 | Comment ID: 08/14/22\_WP\_I\_Radames Ortiz Ortiz (1)

Comment: *I need a home for myself, my wife, my daughter, and her baby. Please provide me with guidance. I have a permanent job with the federal R3 program.*

Greetings Radames Ortiz Ortiz,

PRDOH  
Response:

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). Currently, PRDOH manages the Homebuyer Assistance (HBA) Program under the CDBG-DR Action Plan, which is focused on assisting homebuyers who do not own a home at the time of application to seek support toward homeownership.

In the CDBG-MIT Action Plan Amendment (Substantial), the Single-Family Housing Mitigation Program focuses on prioritizing mitigation assistance to

households with an immediate threat that are uninhabitable due to damages from recent disaster or hazardous events, are under immediate threat due to damage from recent events. The program offers individual flood and landslide threatened homeowners with the option to investigate the feasibility of elevation of their home, the feasibility of reinforcing the property foundation, or the alternative option for voluntary relocation, as specified in the action plan.

PRDOH clarifies that while CDBG-DR funding is focused on disaster recovery, CDBG-MIT will provide funding to support activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage or loss of property, suffering and hardship, to lessen the impact of future disasters.

To obtain more information about the CDBG-DR Homebuyer Assistance Program and its eligibility requirements, you may refer to the Program Guidelines, available in (English) at: <https://cdbg-dr.pr.gov/en/download/homebuyer-assistance-program-2/> And (Spanish) <https://cdbg-dr.pr.gov/download/programa-de-asistencia-directa-al-comprador2/>.

Additionally, please visit PRDOH's website for updates regarding the Single-Family Housing Mitigation Program, as well as the guidelines which will be posted once the program is launched, <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programaticas/> (Spanish).

036	Comment ID:	08/16/2022_WP_NGO_Ayuda Legal Puerto Rico_Ariadna Godreau Aubert (1)
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Comment:

*Ayuda Legal Puerto Rico submitted the following comments to the Draft of the First Substantial Amendment to the CDBG-MIT Action Plan focused on issues related to housing, displacement, and accountability, as well as citizen participation. For Single-Family Housing Mitigation Program, Ayuda Legal Puerto Rico recommends reincorporating language that recognizes the applicant's right to choose relocation or mitigation when the latter alternative is viable, and the right and need for community participation in relocation decisions that impact the social fabric. Also, participation that integrates the community that will be specifically affected. Regarding relocation, the entity considers that PRDOH should integrate policies that minimize displacement with an attention to human rights and climate justice. This recommendation may be accomplished by establishing the aforementioned policy, promoting the adoption of the materials created by HUD regarding racial equity, and integrating race analysis into each Program detailed in the Action Plan. Further, adding language to guarantee the CAC and R3 Program participants in the analysis of these mitigation processes and housing programs, and requiring quarterly cost plan reports, quarterly operations and maintenance cost plan reports in the Subrecipient Agreements. For the Social Interest Housing Program, the entity proposes to incorporate strategies in the selection and monitoring criteria that will continue to offer*

*long-term affordable rent, as well as ensure citizen participation from the residents. In the Economic Development Investment Portfolio for Growth Program, Ayuda Legal Puerto Rico also recommends to include citizen participation from communities as part of the selection criteria for applicants competing to receive these funds.*

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PRDOH acknowledges the receipt of Ayuda Legal Puerto Rico's comments during the public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). Your comment has been recorded and will be taken into consideration.

PRDOH recognizes the importance of minimizing displacement of families and individuals from their homes and neighborhoods. As part of the strategies established in the Single-Family Housing Mitigation Program, PRDOH has included an alternative to minimize displacement, which indicates that the PRDOH Planning Group will support community-level mitigation solutions by gathering site locations for each housing structure submitted to CDBG-DR and CDBG-MIT. In addition to alternative planning solutions to minimize displacement, PRDOH has established the Uniform Relocation Assistance Guide and Anti-Displacement and Relocation Assistance Plan (URA Guide), in compliance with local and federal rules and regulations. As part of the requirements established in the URA Guide, PRDOH must ensure that projects have a relocation plan and take reasonable steps and efforts to minimize displacement.

PRDOH  
Response:

Furthermore, the Single-Family Housing Mitigation Program relocation option provides eligible applicants with the opportunity to participate in housing counseling services where information on housing options will be made available, and homeowners will be given a chance to make an informed decision. We have incorporated additional language in the plan regarding the homeowner option to first consider mitigative options for their home before considering relocation.

Regarding Ayuda Legal Puerto Rico's comments on the Social Interest Housing Mitigation Program for the continuity of promoting affordable housing, PRDOH is committed to ensuring that projects selected for implementation are evaluated following the selection criteria established to address the mitigation needs by funding projects with high quality, modern, resilient housing solutions for vulnerable populations and protected classes.

PRDOH values the collaboration of the Citizen Advisory Committee (CAC) and has established a participatory process for input on program design as outlined in the guidelines for the committee. The guidelines may be found at <https://cdbg-dr.pr.gov/en/download/citizen-advisory-committee-operational-guide/> (English) and <https://cdbg-dr.pr.gov/download/guia-operativa-del-comite-de-asesoria-ciudadana/> (Spanish).

We have also evaluated the HUD Citizen Participation and Equitable Engagement (CPEE) Toolkit and are looking closely for opportunities to

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continue to incorporate the recommendations into our citizen participation processes.

Once these programs are launched, eligible applicants may submit their projects to be considered to receive funds for assistance. Projects will be evaluated by PRDOH following the criteria established in the Action Plan, and detailed in the program guidelines, prior to receiving any funds. Details of the process to apply for funding will be outlined in the Program Guidelines for each Program. Please visit the PRDOH website at <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programaticas/> (Spanish), where these guidelines will be published.

037	Comment ID:	08/17/2022_WP_I_yvette(1)
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Comment:

*THEY SHOULD GIVE MORE GUIDANCE TO THE PARTICIPANTS THAT IF THEIR CREDIT IS POOR NOT TO APPLY, THEY SHOULD NOT WASTE THEIR TIME. I HAVE ALREADY HAD THE EXPERIENCE OF BEING REJECTED BY BANKS AND CREDIT UNIONS. THERE IS NO BENEFIT AS SUCH, THANK YOU.*

PRDOH Response:

PRDOH understands that this comment may be referring to the Homebuyer Assistance Program (HBA) under the CDBG-DR Program. It is correct financial institutions evaluate credit and income requirements as part of the mortgage approval process, and that the HBA assistance is linked to a homebuyer's mortgage approval and property purchase.

While CDBG-DR funding is focused on disaster recovery, CDBG-MIT will provide funding to support activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage or loss of property, suffering and hardship, to lessen the impact of future disasters.

To stay up-to-date on any information or updates related to the CDBG-MIT funds, please visit PRDOH's webpage at: <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) or <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish).

038	Comment ID:	08/17/2022_WP_I_Laura Rosado Collado(1)
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Comment:

*Many first-time homebuyers, who also qualified for assistance, did not receive it on time. By not receiving the assistance in time, there are people who bought their first home without the aid. Now they have a very high monthly payment. That is not fair, when there are people who needed the help and the help did not arrive on time. There are towns where the supply of properties that meet the required structural conditions is minimal. To get a house that qualifies, that is made of concrete, that has the years of construction, non-flood zone, etc., is not easy. There are towns that have*

no options. To get a house that qualifies in the town where you work, and the children go to school is difficult. The people who got a house that qualified, thank God, but had to close the loan, without receiving the help, to avoid losing the opportunity to buy their house should be helped. For example, help them to refinance the debt by using the assistance to lower the monthly payment. Or, for example, help them and provide them with the assistance to pay down the principal. They should find a way to help them receive the assistance because it was not their fault that the assistance did not arrive on time. The money for help is available, they are on time to be fair and for the main reason that was to help people in need to have their first home is fulfilled Thank you!

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Greetings Laura Rosado Collado,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial).

The CDBG-MIT Action Plan Programs do not offer assistance with purchasing a home.

Currently, PRDOH CDBG-DR manages the Homebuyer Assistance (HBA) Program, which is focused on assisting homebuyers who do not own a home at the time of application to seek support toward homeownership.

PRDOH  
Response:

PRDOH acknowledges the homebuying process in the current economic climate is time sensitive and can prove to be difficult. The HBA program continues to be a valuable resource for orientation.

To obtain more information about the CDBG-DR Homebuyer Assistance Program and its eligibility requirements, you may refer to the Program Guidelines, available in English and Spanish at: <https://cdbg-dr.pr.gov/en/download/homebuyer-assistance-program-2/> and <https://cdbg-dr.pr.gov/download/programa-de-asistencia-directa-al-comprador2/>, respectively.

039	Comment ID:	08/17/2022_WP_I_Minerva Gonzalez Nieves(1)
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Comment:

Greetings, I am interested to see if we qualify to re-build my house in concrete, it can be a loan. Thank you.



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Greetings Minerva Gonzalez Nieves,

PRDOH  
Response:

Thank for your participating in the public comment period. In the CDBG-MIT Action Plan Amendment 1 (Substantial), PRDOH has established the Single-Family Housing Mitigation Program, which focuses on prioritizing mitigation assistance to households with an immediate threat that are inhabitable due to damages from recent disaster or hazardous events or are under immediate threat due to damage from recent events. The program offers flood and landslide threatened homeowners with the option to investigate the feasibility of elevation of their home, the feasibility of reinforcing the property foundation, or the alternative option for voluntary relocation, as specified in the Action Plan.

For further information, please visit PRDOH's website for updates regarding the Single-Family Housing Mitigation Program, as well as the guidelines which will be posted once the program is launched, <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programaticas/> (Spanish).

040	Comment ID:	08/17/2022_WP_NGO_Coalicion Comunitaria Loiza Ahora Inc._Eddie A. Rivera(1)
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Comment:

*The community organization Coalición Comunitaria Loíza Ahora (the Coalition), whose slogan is "No one knows our needs better than ourselves", takes the opportunity of providing comments to the CDBG-MIT Action Plan Amendment to propose nine specific projects to help mitigate the primary risk to life and property they have identified in the municipality of Loiza. They expect immediate action to help prevent in Loiza what happened in New Orleans, in communities of Afro-descendant and low-income population, that were abandoned to their fate by the relevant government authorities and disappeared when the levees broke after Hurricane Katrina, causing one of the most catastrophic environmental disasters in the history of the United States.*

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Greetings Eddie A. Rivera and Coalicion Comunitaria Loiza Ahora Inc.,

PRDOH  
Response:

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). PRDOH truly appreciates your comments and recognizes the work you have put into identifying the clear and present risk to life and property that flooding presents to your communities, as well as providing concrete solutions to mitigate such risks. Currently, programs under the CDBG-MIT umbrella are in their planning and development phase. This includes drafting of program guidelines and standard operating procedures for projects to receive CDBG-MIT assistance. The projects proposed by the Coalition appear to fit under the Infrastructure Mitigation Program and will be taken into consideration.



We invite you to stay tuned to our announcements and our CDBG website in both English and Spanish: <https://cdbg-dr.pr.gov/> and <https://cdbg-dr.pr.gov/> for more information as it becomes available.

041

Comment ID:

08/17/2022\_WP\_PS\_Monblanc PR Associates, L.P.\_Franklin Hess(1)

Comment:

*Montblanc PR Associates, L.P., the owner of a 128-unit affordable housing property in Yauco that was so damaged by the January 2020 earthquake that all of its residents still remain displaced, respectfully requests that the draft First Substantial Amendment to the CDBG-MIT Action Plan be modified to include assistance for multifamily affordable rental housing. The Montblanc Gardens Apartments property is 100% covered by a Section 8 HAP contract and provided critical affordable housing for low-income families, as well as elderly and disabled persons, in Yauco. An allocation of CDBG mitigation funds would allow for the property to be rebuilt and upgraded for increased resilience to future disasters, including earthquakes and hurricanes, which would significantly mitigate the risk of future loss of life, injury, displacement, and damage to property which serves an important community need. This is consistent with the HUD policy objectives for CDBG mitigation funds as stated in 84 FR 45838 and 45839, including that they be used to benefit low-income persons who are specifically identified as intended beneficiaries of these funds. It would also allow for increased energy efficiency through the use of solar panels, energy efficient appliances, and water conserving fixtures, which is consistent with the construction goals iterated in the proposed single-family housing mitigation program. We believe the construction work would take approximately 12 months to complete. However, the work would be done in phases such that residents could begin occupying the property and benefitting from the project well before final completion. CDBG mitigation funds must be allocated to these critical affordable housing assets to enable Puerto Rico to rebuild and rehouse its most vulnerable citizens. Otherwise, they will remain displaced, which invites a cycle of crises and results in an otherwise avoidable depletion of Puerto Rico's resources.*

Greetings Franklin Hess and Monblanc PR Associates, L.P.,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial).

PRDOH Response:

Thank you for submitting your proposal. In the CDBG-MIT Action Plan, PRDOH has established the Multi-Sector Community Mitigation Program, which addresses the need to reduce loss of life and property by offering a community-based mitigation approach for self-defined neighborhoods and communities located in an area identified in the Risk Assessment as medium, medium high, or high. This approach to risk reduction allows mitigation to take place on a more comprehensive scale and to address the range of known risks that threaten Puerto Rican communities, not just the risk of those disasters that have affected Puerto Rico in recent years

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such as hurricanes, earthquakes, and localized flood events. The repair of multi-family facilities may be eligible as part of the holistic community approach.

For further information on this program, please visit the PRDOH website where the Program Guidelines for the Multi-Sector Community Mitigation Program will be posted once the program is launched, <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programaticas/> (Spanish).

042	Comment ID:	08/17/2022_WP_I_Kaisa Nieves Pabon(1)
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Comment: *Mismanagement of funds just a smokescreen of frauds, human trafficking, illegal removals, evicting the disabled, more of the same, everyone knows about it and DOES NOTHING. VOUCHERS THAT NO ONE WANTS TO TAKE AND THE HOUSES TOTAL FRAUD.*

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Greetings Kaisa Nieves Pabon,

PRDOH Response: Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). As the grantee of the CDBG-DR and CDBG-MIT allocation, PRDOH is responsible for the adequate management of the federal funds provided by the U.S. Department of Housing and Urban Development (HUD). To prevent any fraud, waste, abuse, or mismanagement, PRDOH has established the Anti-fraud, Waste, Abuse or Mismanagement (AFWAM) Policy, which details more in-depth the processes needed to be taken to report and rectify these unlawful acts. The policy is available in English and Spanish at <https://cdbg-dr.pr.gov/en/download/afwam-policy/> and <https://cdbg-dr.pr.gov/download/politica-afwam/>.

If you know or suspect of someone that has committed fraud, waste, abuse or mismanagement related to the CDBG-DR and CDBG-MIT Programs, please visit PRDOH's website at <https://cdbg-dr.pr.gov/app/cdbgdrpublic/Fraud> (English) or <https://cdbg-dr.pr.gov/app/cdbgdrpublic/Fraud/IndexES> (Spanish) to complete an official form. This form can also be submitted through e-mail, post mail or in-person.

043	Comment ID:	08/17/2022_WP_I_Diana A. Julia(1)
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Comment: *I agree on everything, and I love how the government has handled it all.*

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Greetings Diana A. Julia,

PRDOH  
Response:

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). It has become part of the public comment record. The CDBG-MIT funds represent a unique opportunity to implement strategies that will improve Puerto Rico's resiliency against future disaster events. To learn more about the CDBG-MIT funds, please visit the following website, available in English and Spanish at: <https://cdbg-dr.pr.gov/en/> and <https://cdbg-dr.pr.gov/>, respectively.

044  
Comment  
ID:

08/19/2022\_WP\_I\_Wanda I. Crespo Acevedo(1)

Comment:

*I hereby submit comments on the Mitigation Plan draft under the Federal Housing Department's CDBG funds (known as CDBG-MIT), which is available for public review. My comments are directed at the need to strengthen the analysis related to climate change and adaptation in the Plan, so that the proposed programs and activities effectively respond to the current and future needs of Puerto Rico and the objectives of these funds. Multiple reports have documented that climate change could increase the frequency and intensity of extreme weather events (Gould et al, 2018; Mycoo et al, 2022). Even the most recent IPCC report indicates that many of the impacts and risks associated with climate change are amplified on islands. Therefore, the integration of the most up-to-date and available climate science is critical to advance a fair and equitable recovery and build resilience to climate change. The CDBG-MIT Plan makes use of Puerto Rico's 2016 Mitigation Plan for Puerto Rico (Puerto Rico's 2016 SHMP), which was updated by the Government of Puerto Rico in 2021 and is available at this link [URL]. The 2016 Mitigation Plan does not contain recent information on the natural hazards affecting Puerto Rico and how climate change impacts them. It is recommended that the most recent information from the 2021 Action Plan be included, in accordance with the requirements established by HUD for the recipients. It is further recommended that it be complemented with other secondary sources of information, which would allow for a more robust risk analysis, including: Caribbean Chapter of the Fourth National Climate Report Puerto Rico State of the Climate Report, 2021 Climate Summary for Puerto Rico and the U.S. Virgin Islands CDBG-MIT Plan, on page 91 prioritizes the consequences and severity for each identified hazard, according to information from Puerto Rico's 2016 SHMP. It identifies the heat hazard as low risk through Puerto Rico. However, this is a matter of concern in Puerto Rico, which is exacerbated by the vulnerability of the population. In Puerto Rico, nighttime temperatures have increased over the past decades and are expected to continue to rise in scenarios of higher and lower emissions (Gould et al, 2018; Puerto Rico Climate Change Council, 2022; Runkle et al, 2022).*

*In short, the danger of heat exists in Puerto Rico and will be increased by the effects of climate change. The publications included in the attached*

communication provide important information on the heat hazard in the Puerto Rican population. Links to the indicated publications are included in the communication attached with this commentary. Thanks a lot.

Greetings Wanda I. Crespo Acevedo,

PRDOH  
Response:

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). Your comment is part of the public comment record. The CDBG-MIT funds represent a unique opportunity to implement strategies to improve Puerto Rico's resiliency against future disasters. The CDBG-MIT Action Plan Amendment 1 (Substantial) contemplates mitigation for all climate change disasters, including the effect of heat on the island's environment. The information provided in your comment will be considered as we prepare the Action Plan Amendment and for subsequent updates to the plan.

To learn more about amendments and subsequent updates to the CDBG-MIT Action Plan and its programs, please visit the following website, available in English and Spanish at: <https://cdbg-dr.pr.gov/en/> and <https://cdbg-dr.pr.gov/>.

045	Comment ID:	08/19/2022_WP_NGO_Cambio PR_Ingrid Vila-Biaggi(1)
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Comment:

*To Whom It May Concern: CAMBIO PR appreciates the opportunity to provide comments on the CDBG-Mitigation Action Plan, as amended. Our comments focus on the Community Energy and Water Resilience Installations Program. CAMBIO reiterates the importance and value of rooftop solar and storage systems in providing resiliency to households. Last year, CAMBIO released the results of detailed grid modeling studies analyzing the technical feasibility of supplying 75% of the island's electrical needs with distributed renewable energy and battery storage by 2035, including equipping all homes on the island with small-scale solar and storage systems, specifically 2.7 kW solar paired with 12.6 kWh storage. The modeling showed that this decentralized and resilient system could be achieved with modest upgrades to the distribution system. If adopted, this approach would reduce and stabilize electric rates by reducing the island's dependence on imported fossil fuels, while radically transforming the resiliency situation for Puerto Rico residents within fifteen years. CAMBIO provides the following specific comments:*

- *Regarding the Community Installations subprogram, we urge Vivienda to clarify that community-based systems could include individual household renewable energy systems that are installed as part of a collective, community effort. CAMBIO participated in a successful initiative in 2020 in which a group of homeowners collectively issued an RFP to select an installer for household solar and storage systems, resulting in an approximately 17% discount in*

price because of the bulk discount. We are aware of other organizations that have similarly organized bulk purchases to obtain better prices for solar and storage equipment. CAMBIO has received inquiries from other communities that are interested in bulk purchase projects, and the CDBG-MIT funds, if structured properly, could provide an important vehicle for extending this model to low-income communities.

- Regarding the Community Installations subprogram, we urge Vivienda to include upgrades or repairs of existing community-based energy systems in low-income communities as eligible for funding. It is important that existing energy projects in low-income communities be able to continue providing reliable power to the communities they serve.
- Regarding the Community Installations subprogram, we urge Vivienda to retain these original prioritization categories that were deleted in the Amended Action Plan: “communities with fifty-one percent (51%) LMI beneficiaries” and “Communities with high-risk energy and water security.”
- Regarding the Home Energy Resilience Improvements subprogram, we urge Vivienda to ensure that eligible participants are not deterred by a complicated process to demonstrate their eligibility. Thank you for this opportunity to submit our comments. Cordially, Ingrid Vila-Biaggi, President and Co-Founder Cathy Kunkel, Energy Program Manager.

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Greetings Indrid Vila-Biaggi and Cambio PR,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial).

PRDOH acknowledges the receipt of Cambio PR comments on the CDBG-MIT Action Plan Amendment 1 (Substantial). It has been recorded and will be taken into consideration. PRDOH recognizes the importance of renewable energy for the resilience of communities and individual households. On the CDBG-MIT Action Plan, PRDOH has established the Community Energy and Water Resilience Installations Program, which is divided into three (3) subprograms: Home Energy Resilience Improvements, Incentive Program, and Community Installations.

PRDOH  
Response:

Both the Home Energy Resilience Improvements Program and the Incentive Program offer individual assistance for eligible applicants. These programs will be administered under one (1) unified structure referred to in Program Guidelines as the Community Energy and Water Resilience Installations – Household (CEWRI – HH) Program. The Home Energy Resilience Improvements Program will evaluate the household's energy needs to provide a solution based on resilient design and improvement projects. The maximum award under this subprogram is \$30,000. Under the Incentive Program, an applicant could be eligible to a maximum award

of \$20,000 or a designated percentage of the household project costs to install a renewable energy system.

For community-based projects, PRDOH has included the Community Installations Program. This subprogram offers community installations of energy production and storage to complement home-based improvements or reduce household barriers to mitigation. Community installations may include larger kilowatt, bimodal systems supporting area residents' health, lighting, communication, and other backup energy needs. Community-based systems may also have public microgrids.

Additionally, non-governmental organizations and not-for-profit entities have been identified as eligible and may apply for the Community Installations subprogram. PRDOH recognizes your recommendations regarding community-based systems. We have clarified in the Plan that community-based systems may include individual households as part of a collective.

Regarding the original prioritization categories for the household installations, PRDOH will still be targeting and plans to serve the most vulnerable populations within the low-and-moderate income (LMI) category as well as households with urgent mitigation needs.

Once these programs are launched, eligible applicants may submit their projects to be considered to receive funds for assistance. All projects will be evaluated by PRDOH following the criteria established in the Action Plan and detailed in the program guidelines.

Details of the process to apply for funding will be outlined in the Program Guidelines for each Program. Please visit the PRDOH website at <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programaticas/> (Spanish), where these guidelines will be published.

046	Comment ID:	08/19/2022_WP_PS_Freewind Energy LLC_Taylor Tondelli(1)
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Comment: *All project entries proposing renewable energy plans, micro-grids, solar, or power lines maintenance should open up their considerations to wind energy. Freewind Energy's micro-wind turbines are up to 4 times more efficient than solar panels within the same surface area of roof. We request that the Action Plan please include wind energy as a source of renewable energy in Puerto Rico Plan, an island that has 24 hours of wind which can be harnessed to power the entire island for free.*

PRDOH Response: Greetings Taylor Tondelli and Freewin Energy LLC,  
Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). PRDOH acknowledges the receipt of Freewind Energy LLC comments on the CDBG-MIT Action



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Plan Amendment 1 (Substantial). PRDOH recognizes the importance of renewable energy for the resilience of communities and individual households. On the CDBG-MIT Action Plan, PRDOH has established the Community Energy and Water Resilience Installations Program, which is divided into three (3) subprograms: Home Energy Resilience Improvements, Incentive Program, and Community Installations.

Both the Home Energy Resilience Improvements Program and the Incentive Program offer individual assistance for eligible applicants. These programs will be administered under one (1) unified structure referred to in Program Guidelines as the Community Energy and Water Resilience Installations – Household (CEWRI – HH) Program. The Home Energy Resilience Improvements Program will evaluate the household's energy needs to provide a solution based on resilient design and improvement projects. The maximum award under this subprogram is \$30,000. Under the Incentive Program, an applicant could be eligible to a maximum award of \$20,000 or a designated percentage of the household project costs to install a renewable energy system.

For community-based projects, PRDOH has included the Community Installations Program. This subprogram offers community installations of energy production and storage to complement home-based improvements or reduce household barriers to mitigation. Community installations may include larger kilowatt, bimodal systems supporting area residents' health, lighting, communication, and other backup energy needs. Community-based systems may also have public microgrids.

Projects that propose energy resilience with renewables will be considered. PRDOH understands these projects offer a modern and sustainable solution to mitigate the risk of energy instability. Projects should focus on clean energy technology and can employ wind, solar, storage hybrids, or other technology appropriate to the environmental attributes of the project location and cost and/or performance advantages.

Once these programs are launched, eligible applicants may submit their projects to be considered to receive funds for assistance. All projects will be evaluated by PRDOH following the criteria established in the Action Plan, and detailed in the program guidelines. Details of the process to apply for funding will be outlined in the Program Guidelines for each Program. Please visit the PRDOH website at <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programaticas/> (Spanish), where these guidelines will be published.

047	Comment ID:	08/19/2022_WP_GE_Municipio de Guaynabo_Ada E. Bones-Berrios(1)
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Comment: *Comment*

The Municipality of Guaynabo has been conceptualizing several projects to address the landslide problems of the residents along the embankments of the Guaynabo River. That is why within the MAG-002MIT Project, several communities that present similar problems are included. Due to an involuntary error, the name of the Sierra Berdecía Urbanization, which is part of the project area to be worked, was not included. The amendment to the description and location of the project is included.

MAG-002MIT

*Stabilization of the Guaynabo River Embankments*

*Description of Project*

*In heavy rain, such as the passage of Hurricanes, force and velocity of the water in Guaynabo River causes the slopes of the river to erode substantially creating meanders, especially in the areas where change in flow direction occur, like Colinas and Sierra Berdecía community area. Due to the level difference between the houses and the river, there is a danger to properties and their residents. In these communities, damage occurred in courtyards of the residences. This project includes repair or relocation of properties in affected area, at the height of the Colinas and surrounding communities.*

*Description of Location*

*Sierra Berdecía, Colinas de Guaynabo, Riveras de honduras, Terrazas de Guaynabo, Colimar and Villa Providencia Elderly Home Areas*

*Note: This comment was submitted on August 3, 2022, but the system didn't generate the acknowledgement of receipt. We're submitting our petition again.*

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Greetings Ada E. Bones-Berrios and Municipio Guaynabo,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial).

PRDOH  
Response:

PRDOH confirms the receipt of the Municipality of Guaynabo comment submitted during the CDBG-MIT Action Plan Amendment 1 (Substantial) public comment period. The Proposed Projects Log item MAG-002 was information gathered and utilized during the preparation of the initial Action Plan. The projects listed in Appendix D only serve as an example of a potential project that may apply under CDBG-MIT Programs.

However, please be aware that once the programs are launched, this project may be submitted to one of the CDBG-MIT Programs to be considered to receive funds for assistance. All projects will be evaluated by PRDOH prior to receiving any funds.



Details of the process to apply for funding will be outlined in the Program Guidelines for each Program. To stay up-to-date on any information or updates related to this Action Plan, please visit the PRDOH website at <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) and <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish).

048

Comment ID:

08/19/2022\_WP\_PS\_Corporacion del Proyecto ENLACE del Caño Martín Peña\_Mario Nunez Mercado(1)

Comment:

*The Proyecto ENLACE del Caño Martín Peña (ENLACE) Corporation and Fideicomiso de la Tierra del Caño Martín Peña (Fideicomiso) main comments focus on mitigation for state-caused hazards, hazard frequency assessment, risk analysis based on community lifelines, general program requirements for Single-Family Mitigation Program, and Multi-Sector Community Mitigation Program, elevation standards and citizen participation. According to the government corporation and non-profit entity, PRDOH should include language addressing state-caused hazards due to a lack of timely and strategic intervention within the Action Plan. The entities also identify the discrepancy in the accuracy of FEMA maps and the reality of the Caño Martín Peña Districts ENLACE. Due to these discrepancies, the entities believe that using only FEMA flood zones to determine mitigation strategies and allocating funds will lead to an inaccurate analysis that will leave vulnerable communities with their needs unmet. The entities also request PRDOH to coordinate with the ENLACE Project on the data to be used to reflect the flood analysis in the Caño Martín Peña District to ensure accuracy when analyzing in the PR Critical Lifeline – Regional Dashboard data. In the letter, entities request for PRDOH to provide list of outreach efforts conducted to better assess these efforts to reach vulnerable communities, and seek to know whether additional outreach activities will be executed. In the Single-Family Housing Mitigation Program, the entities recommend that PRDOH should make the necessary amendments to the Action Plan to clarify distinctions between “acquisition”, “purchase” and “buyout”, and makes the necessary amendments to the Relocation section under the program to clarify that relocated beneficiaries are not purchasing “stock”, since they would be purchasing/buying a house that is within the stock or inventory of new housing developments. For the Multi-Sector Community Mitigation Program, the entities propose for the program description to clarify that Caño Martín Peña Special Planning District is comprised of 8 communities. The entities also recommend to clarify that PRDOH will work with the Corporación del Proyecto ENLACE del Caño Martín Peña and the Fideicomiso de la Tierra del Caño Martín Peña to implement at a minimum, a \$52 million community-based project to serve the housing needs of its residents. Additionally, the entities request for PRDOH to take into consideration the inflation costs on construction labor and materials*

and adjusts the set-aside to better represent the implementation of community-based projects that will address the housing and infrastructure needs of the residents in the Caño Martín Peña District. For elevation standards, the government corporation and non-profit propose for PRDOH to lower the requirement to at least (1) feet above the base flood elevation or that PRDOH excludes the Caño Martín Peña Special Planning District from that requirement in order to maintain the feasibility of the projects. Lastly, the entities suggest to create Housing Committees in every community composed of community leaders, as well as personnel or consultants with acquisition and relocation experiences as part of the citizen participation strategies.

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Greetings Mario Núñez Mercado and Corporación del Proyecto ENLACE del Caño Martín Peña,

PRDOH acknowledges ENLACE feedback regarding FEMA's floodplain maps and the base-flood elevation requirements. However, PRDOH is required to follow certain federal standards regarding how flood risk is evaluated. If you believe there is a discrepancy with the floodplain maps, we urge you to follow FEMA's established process for updating the maps.

PRDOH  
Response:

Regarding the risk assessment evaluation of infrastructure quality and density, PRDOH used the best available data to assess vulnerability. As additional data regarding infrastructure quality becomes available, it can be incorporated into subsequent analysis. PRDOH acknowledges your request to make the Green Building Standards more flexible and we have clarified in the Action Plan that applicants are encouraged to apply the standards, but not required.

ENLACE inquiries about the statement on page 294 regarding outreach and collaboration. This statement was referring to the original action plan process.

PRDOH acknowledges your request to transfer vacant properties to the Trust. We are evaluating the legal implications of this request. Furthermore, PRDOH has revised the plan to clarify that beneficiaries are purchasing a home rather than "stock". Additionally, PRDOH revised the language regarding Caño Martín Peña Communities; the plan now states that there are eight (8) communities rather than one (1). We will continue to evaluate potential Subrecipients under the Multi-Sector Community Mitigation Program.

049	Comment ID:	08/19/2022_WP_NGO_Barrío Eléctrico_Lauren Rosenblatt(1)
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Comment:

*Barrio Eléctrico has read the Community Development Block Grant Action Plan for Disaster Mitigation in Puerto Rico ("Action Plan") and offers a few general observations and focus on the Programs for Community Installations for Power and Water. Barrio Eléctrico is highly supportive of the Action Plan's guiding principles, which seek to reduce loss of life and catastrophic failures through sustainable investments by both public and*

private sources. Our responses to the Action Plan therefore focus on how to ensure that the funded Programs have the right foundations to ensure the outcomes are sustainable. Through a truly sustainable investment plan, private funding from impact investors will follow. Sustainable investment requires more than an investment in the technology and infrastructure. It requires an investment in the people who will be using and benefiting from it. This Action Plan correctly identifies the weaknesses in the physical infrastructure of Puerto Rico, without proposing how it will capitalize on the valuable asset represented by Puerto Rico's population. The human factor in sustainability necessitates that the Action Plan require co-investment by the homes and families who will be receiving money and/or goods and services through the CDBG-MIT funds. Rather than gifting households equipment and services that will function as a finite supplement to the island's electric utility issues, individuals and families should be empowered to participate in and sustain alternative energy services by accessing them at affordable rates. In addition, community capacity building is also critical to support today's investment as a solid foundation for the investment of tomorrow. Program funding should be set aside specifically for community organizing and capacity building, which will support and lead the participating families in their journey to a more robust energy future. It will also promote the ripple effect of economic development in the community resulting from investments on a home-by-home basis. The Action Plan should also offer details regarding how it will administer the programming and disbursement of funds. Barrio Eléctrico is concerned that the plan for recruiting beneficiaries and implementing the Community Installations for Power and Water will be exclusively in the discretion of the chosen programming administrators. The details of how to recruit and prioritize expenditure of these funds is an important factor in sustainability of the investment, which will demonstrate strongest outcomes most immediately by triaging the most vulnerable cases. The Action Plan should know and define how administration of the programs will reach low and moderate-income (LMI) households, who also tend to be the families most in need of help to access the programming and benefits. To that end, the Action Plan should reinstate the priorities for the proposed programming of LMI communities and homes. Finally, and most importantly, Barrio Eléctrico is highly supportive of the Action Plan's embracing investment in distributed energy resources, and the goal of making that investment data-driven. We believe that distributed energy resources will rebuild a more resilient energy infrastructure with much broader implications. This "grass-roots" rebuilding is the most sustainable in that it represents a direct connection with and investment in the end-user of the resource, which has economic development potential for the household and the community in which it resides. That direct interaction is how you obtain the data, analyze outcomes, and correct course as needed. Program funding should be directed at methods of implementation that include community groups, municipalities, and non-governmental and not-for-profit organizations like Barrio Eléctrico. These organizations are driven by missions that ensure the CDBG investment will be long term and sustainable, and will support the investments with data gathering and accountability.

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Greetings Lauren Rosenblatt and Barrio Eléctrico,

Thank you for your participation during public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). PRDOH appreciates your support for proposed changes to CDBG-MIT Action Plan Amendment 1 (Substantial). As established in the CDBG-DR Action Plan, the Community Energy and Water Resilience Installations (CEWRI) Program is meant to work with and complement the R3 Program. The CEWRI Program is designed to provide energy and water efficiency and resiliency installations to eligible projects being rehabilitated, reconstructed, or new construction under the R3 Program.

PRDOH  
Response:

PRDOH recognizes Barrio Eléctrico concern with maintaining the priority categories. However, stakeholder feedback has also stressed the importance of simplifying the processes related to energy programs. It is PRDOH's belief that the elimination of priorities, in this instance, will accelerate the implementation of the program, while still allowing vulnerable populations to participate. Additionally, serving the critical workforce is one of the reasons that prompted PRDOH to allow access to moderate-income homeowners to participate in the Incentive program.

Please visit the PRDOH website for more information, where the Program Guidelines for the CEWRI-HH Program will be posted once the program is launched: <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programmaticas/> (Spanish).

050	Comment ID:	08/19/2022_WP_PS_Asociacion de Constructores de Puerto Rico _Vanessa de Mari-Monserrate(1)
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Comment:

*Given the enormous long-term and short-term impact that the housing sector has on Puerto Rico's economy, we recommend that more investment and programs be put in place to incentivize well-planned, economically resilient housing developments (ie multi-family, elderly, mixed-income/mixed-finance, among others).*

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Greetings Vanessa de Mari-Monserrate and Asociación de Constructores de Puerto Rico,

PRDOH  
Response:

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). PRDOH appreciates the time taken to express your recommendation.

The Single-Family Housing Mitigation Program addresses the need to reduce loss of life and property by offering the opportunity to repair, retrofit, rehabilitate, reconstruct, elevate, and relocate, where feasible, for single-family homeowners, offering new mitigation options to households that face risk.

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The Multi-Sector Community Mitigation Program considers mitigation needs for the households described in high-risk areas, but from a holistic community perspective to minimize the impact of risk reduction activities that would otherwise displace individuals or disrupt communities. This Program considers mitigation needs on a community-scale to address local risks while keeping communities together. By addressing these needs on a community rather than individual level, this Program promotes relocating or rebuilding neighborhoods and communities to lower the risk posed to its residents, enabling them to thrive in a lower risk environment.

Details of the process to apply for funding will be outlined in the Program Guidelines for each Program. To stay up-to-date on any information or updates related to this Action Plan, please visit the PRDOH website at <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) and <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish).

051

Comment ID:

08/19/2022\_WP\_NGO\_Solar United Neighbors\_David Ortiz(1)

Comment:

*August 19, 2022 To whom it may concern: Thank you for providing a comment period on the amended CDBG-Mitigation Action Plan. Solar United Neighbors (SUN) is a non-profit organization dedicated to creating a clean, equitable, resilient energy system that benefits everyone. Across the United States, we have helped more than 7,000 homes and businesses add a combined 79 MW of solar. We recently began SUN's Puerto Rico program, and we have launched 2 solar bulk purchase groups to help people learn about solar and go solar together at a group price. We have educated hundreds of Puerto Ricans about solar. SUN was made aware of this comment opportunity through Solar & Energy Storage Association (SESA) of Puerto Rico. There is an extensive need for increased access to mitigation actions that increase reliable access to electricity across the island. SUN encourages making the programs straightforward and easy for low-to-middle income people to access to reduce burdens on program applicants, and increase access to the programs. We strongly encourage using qualifications for existing programs to pre-qualify people to reduce their burden in applying for the program. Alternatively, census tracts or block groups could be used as a way to pre-qualify people and reduce some burdens of the application process. Additionally, we support CAMBIO's comments. We would like to highlight their comments on increasing investments in small-scale solar and storage systems to increase home electric access and reliability, grid resiliency, and lower energy bills for Puerto Ricans. As stated by CAMBIO: "If adopted, this approach would reduce and stabilize electric rates by reducing the island's dependence on imported fossil fuels, while radically transforming the resiliency situation for Puerto Rico residents within fifteen years." More on CAMBIO's study can be found at: <https://cambiopr.org/solmastechos> And, we support the specific comments on this plan from CAMBIO: \* Regarding the Community Installations subprogram, we urge Vivienda to clarify that community-based systems could include individual household renewable energy systems that are installed as part of a collective, community effort.*

CAMBIO participated in a successful initiative in 2020 in which a group of homeowners collectively issued an RFP to select an installer for household solar and storage systems, resulting in an approximately 17% discount in price because of the bulk discount. We are aware of other organizations that have similarly organized bulk purchases to obtain better prices for solar and storage equipment. CAMBIO has received inquiries from other communities that are interested in bulk purchase projects, and the CDBG-MIT funds, if structured properly, could provide an important vehicle for extending this model to low-income communities. \* Regarding the Community Installations subprogram, we urge Vivienda to include upgrades or repairs of existing community-based energy systems in low-income communities as eligible for funding. It is important that existing energy projects in low-income communities be able to continue providing reliable power to the communities they serve. \* Regarding the Community Installations subprogram, we urge Vivienda to retain these original prioritization categories that were deleted in the Amended Action Plan: "communities with fifty-one percent (51%) LMI beneficiaries" and "Communities with high risk energy and water security." \* Regarding the Home Energy Resilience Improvements subprogram, we urge Vivienda to ensure that the process for qualification is easy and straightforward. Using qualifications for existing programs to pre-qualify people will reduce the administrative burden and ensure that participants are not deterred by a complicated process to demonstrate their eligibility. Thank you for providing an opportunity for comments on this program. Sincerely, David Ortiz Puerto Rico Program Director, Solar United Neighbors

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Greetings David Ortiz and Solar United Neighbors,

PRDOH is thankful for Solar United Neighbors for sharing their comments and recommendations on this CDBG-Mitigation Action Plan Amendment (APA1). Renewable energy development is a recurring theme in the CDBG-MIT APA1 and other published Action Plans (such as CDBG-DR and CDBG-DR Electrical System Enhancements). PRDOH is earnestly committed to said cause.

PRDOH  
Response:

Community installations of energy production and storage, water catchment systems, and sanitary sewer system solutions may be offered to complement home-based improvements or reduce household barriers to mitigation. These installations may include larger kilowatt, bimodal systems that can support health, lighting, communication, and other backup energy needs of area residents; public microgrids; water security interventions (where a greater community need may be met, where more localized interventions are less feasible or cost-efficient, and where the community is not part of the Puerto Rico water supply system). For both energy and water resilience efforts, these installations may be introduced in areas where housing typologies or existing structures cannot accommodate solar panels or water systems, or where a larger scale typology is more cost-efficient to serve the community.

For individual household assistance, the CDBG-MIT Community Energy and Water Resilience Installations (CEWRI) Program has the Home Energy



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Resilience Improvements Subprogram and the Incentive Program. Eligible applicants must own or have a proprietary interest in a single-family home structure, and it must be their primary residence.

PRDOH recognizes Solar United Neighbors concern with maintaining the priority categories. However, stakeholder feedback has also stressed the importance of simplifying the processes related to energy programs. It is PRDOH's belief that the elimination of priorities, in this instance, will accelerate the implementation of the program, while still allowing vulnerable populations to participate. Additionally, serving the critical workforce is one of the reasons that prompted PRDOH to allow access to moderate-income homeowners to participate in the Incentive program.

Specific details for the application process and project selections will be outlined in the Program Guidelines once the Amended Action Plan is approved and program designs are updated and/or completed.

052	Comment ID: 08/19/2022_WP_NGO_PRoTechos_R Marrero Cordero(1)
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Comment:

*For the past three years, PProTechos has been helping families in financial need to rebuild their roofs. Although there are limited resources available through the state government, there are few opportunities for non-profit entities to support families in need of a decent roof over their heads. Under this mitigation plan, single-family homes are left out of the assistance and/or grants available to support the thousands of families who still need roofs, and which we have had difficulty helping due to a lack of materials and resources. We suggest that single-family homes may receive funds and/or that non-profit entities that support the reconstruction of single-family homes may access resources for materials, labor, and operating costs. We suggest eliminating the following clause included in the SINGLE-FAMILY HOUSING MITIGATION PROGRAM "Disbursement of Program funds incurred for associated costs of labor, materials, facilities, fixtures, supplies, finishes and other expenses to carry out a construction activity for an applicant and/or ineligible property."*

PRDOH Response:

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Greetings R. Marrero Cordero and ProTechos,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial).

PRDOH acknowledges your comments. They have been recorded and will be taken into consideration when revising the Action Plan. The Single-Family Housing Mitigation Program focuses on prioritizing mitigation assistance to households with an immediate threat that are uninhabitable due to damages from recent disaster or hazardous events, are under immediate threat due to damage from recent events. The program offers individual flood and landslide threatened homeowners with the option to investigate the feasibility of elevating of their homes, reinforcing the

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properties' foundations, or the alternative option for voluntary relocation, as specified in the Action Plan. The Program also includes installing solar and water resilience systems as mitigation activities. The eligible applicants for limited mitigation assistance funds must comply with the following criteria: uninhabitable primary residence due to damage from recent disaster events; and/or primary residence with an "immediate threat" due to damage from recent disaster events, Certification of Substantial Determination issued by PRPB, and/or primary residence in a high-risk area.

Once these programs are launched, eligible applicants may submit their projects to be considered to receive funds for assistance. The projects will be evaluated by PRDOH following the criteria established in the Action Plan, and detailed in the program guidelines, prior to receiving any funds. Details of the process to apply for funding will be outlined in the Program Guidelines for each Program. Please visit the PRDOH website at <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programaticas/> (Spanish), where these guidelines will be published.

053	Comment ID:	08/19/2022_WP_NGO_GRID Alternatives_Alexandra Wyatt(1)
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*GRID Alternatives (GRID) is a 501(c)(3) nonprofit solar installer with vast experience in the United States. GRID is also a leader in low-income renewable energy policy and partners with utilities, state agencies, and other stakeholders to increase solar and storage access and equity. Towards that goal, GRID maintains the Low-income Solar Policy Guide in partnership with Vote Solar (available at <https://www.lowincomesolar.org/>). In their presentation, they support requests for an extension of the public comment deadline and look forward to future opportunities for more detailed input on renewable energy and storage programs.*

Comment:

*As part of their work, GRID advocates for equity to be the driving principle in energy and resilience-related policies through thoughtful design and administration, incorporating input from the communities most affected. To that end, they feel CDBG-MIT funds must be tailored to assist those households that cannot otherwise afford resilience measures in the form of solar power and storage systems. Without appropriate targeting, these funds are likely to go to projects that would have occurred anyway, eliminating any additional impact, and diverting funding from where it is most needed. They pose that paperwork and similar barriers can be especially significant for the lowest income households, so steps taken administratively to streamline the process for these households are crucial. Coordination with other income-qualified programs can not only improve targeting but also multiply the benefits of each program and maximize return on investment.*



*GRID add that solar and storage system installations should be encouraged but not required to be accompanied by water system installations, as appropriate expertise in these energy and water systems is not always found in the same companies or entities. Thus, tying them together introduces logistical hurdles and practical project-by-project coordination issues that are likely to significantly slow down deployment.*

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Greetings Alexandra Wyatt and GRID Alternatives,

Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial).

As the Grantee for the CDBG-MIT funds, PRDOH is committed to implementing programs and projects that will benefit the most in need communities of Puerto Rico. On the CDBG-MIT Action Plan, PRDOH has established the Community Energy and Water Resilience Installations (CEWRI) Program, which is divided into three (3) subprograms: Home Energy Resilience Improvements, Incentive Program, and Community Installations.

Both the Home Energy Resilience Improvements Program and the Incentive Program offer individual assistance for eligible applicants. These programs will be administered under one (1) unified structure referred to in Program Guidelines as the Community Energy and Water Resilience Installations – Household (CEWRI – HH) Program. The Home Energy Resilience Improvements Program will evaluate the household's energy needs to provide a solution based on resilient design and improvement projects. The maximum award under this subprogram is \$30,000. Under the Incentive Program, an applicant could be eligible to a maximum award of \$20,000 or a designated percentage of the household project costs to install a renewable energy system.

PRDOH  
Response:

For community-based projects, PRDOH has included the Community Installations Program. This subprogram offers community installations of energy production and storage to complement home-based improvements or reduce household barriers to mitigation. Community installations may include larger kilowatt, bimodal systems supporting area residents' health, lighting, communication, and other backup energy needs. Community-based systems may also have public microgrids.

PRDOH acknowledges your support for the decoupling of the energy and water improvements offered under the CEWRI-HH program.

Once these programs are launched, eligible applicants may submit their projects to be considered to receive funds for assistance. All projects will be evaluated by PRDOH following the criteria established in the Action Plan, and detailed in the program guidelines, prior to receiving any funds. Details of the process to apply for funding will be outlined in the Program Guidelines for each Program. Please visit the PRDOH website at [https://cdbg-dr.pr.gov/en/download/program-guidelines/\(English\)](https://cdbg-dr.pr.gov/en/download/program-guidelines/(English)) and

<https://cdbg-dr.pr.gov/download/guias-programaticas/>(Spanish), where these guidelines will be published.

054	Comment ID:	08/19/2022_WP_NGO_Fideicomiso de la Tierra del Cano Martin Pena_Mario Nunez Mercado(1)
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*Mitigation of the Present and Future*

Comment:

*As Puerto Ricans look toward their collective future and make decisions about how to mitigate natural and human-caused hazards and instabilities such as hurricanes, flooding, climate change and sea level rise, economic disparity, earthquakes, pandemics, drought, and many others, several organizing principles emerge. These organizing principles form a common thread throughout the Risk-Based Mitigation Needs Assessment and inform the programmatic response to the mitigation needs identified therein: (a) reduce instability by lessening the impact of the hazard events on the built environment, social structures, and ecological systems; (b) improve the adaptive capacity of Puerto Rico by removing impediments to long-term systematic change and promoting collaborative governance at multiple scales; (c) create self-sustaining, regenerative systems that have the ability to persist or thrive through physical, economic and social challenges.*

*From our experience of implementing projects in the District and collaborating with different government agencies, we would also argue that state-caused hazards due to lack of timely and strategic interventions must be addressed within the Action Plan.*

PRDOH Response:	Greetings Mario Nuñez Mercado and Fideicomiso de la Tierra del Cano Martin Pena,  Thank you for your participation during this public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). This public comment was submitted twice on different dates and has been addressed.
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055	Comment ID:	08/19/2022_WP_NGO_Alianza Comunitaria Ambientalista del Sureste; Amigo del Rio Guaynabo; Coalicion Organizaciones Anti-Incineracion; Comité Dialogo Ambiental; Comité Yabuceono P de Vida; El Puente de Williamsburg, Inc. - Enlance Latino de Accion Climatica; Mujeres de Islas; Natural resources Defense_Raghu Murthy(1)
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*These organizations agree with PRDOH's analysis regarding the grave risks posed by Puerto Rico's centralized, fossil-fuel-based electric grid and explain why, in light of that analysis, PRDOH should expand funding for distributed clean resources. They express that, to achieve the resilient, reliable, independent electric grid that PRDOH makes clear is needed, it should greatly expand the amount dedicated to distributed solar and storage throughout the archipelago and ensure that ample funding from the Community Energy and Water Resilience Installations Program goes to the low-income Puerto Ricans who need it most.*

Comment:

*The entities also understand that PRDOH should remove all references to the ER1 Cost-Share Program in this Substantial Amendment, which they believe has already been rejected by HUD (after review of the CDBG-DR Electrical Systems Enhancements Action Plan), as that program would rely on the FEMA Programmatic Environmental Assessment. They conclude that the PEA violates the National Environmental Policy Act, violates Puerto Rico energy law and policy, conflicts with Congressional directives in the Disaster Mitigation Act and the Disaster Recovery Reform Act, and undermines the current Administration's Executive Orders on Climate Change and Environmental Justice.*

*The entity also request PRDOH extends the deadline for public comment by a reasonable period, to allow all Puerto Rico stakeholders and interested members of the public to provide comments.*

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PRDOH thanks you for taking the time and effort to review and comment on this proposed CDBG-MIT Action Plan Amendment.

PRDOH  
Response:

As to your concerns and suggestions related to the Energy Grid Rehabilitation and Reconstruction (ER1) Cost Share Program, PRDOH clarifies that the ER1 program was proposed and included in the CDBG-DR Electrical Power System Enhancements and Improvements Action Plan, subject to the provisions of the Notice 86 FR 32681 (June 28, 2021) and the allocation of funds provided therein. The CEWRI Program exists in various iterations under the original CDBG-DR and the CDBG-MIT allocations. As per HUD rules contained in the respective Federal Register Notices, PRDOH is barred from using funds from one allocation for activities that fall under a different one. As such, funds that were identified for the ER1 Program under the CDBG-DR Electrical Power System Enhancements and Improvements Action Plan cannot be assigned to any of the CEWRI Programs, either under CDBG-DR or CDBG-MIT.

Furthermore, the ER1 has not been rejected by HUD, but received partial approval pending clarification of certain points prior to final approval and program launch. To that end, PRDOH is working closely with the Central Office of Recovery, Reconstruction and Resiliency (COR3) to identify potential projects that will be funded under the ER1 Program to comply with HUD's requirements and gain access to the complete allocation. The purpose of this program will be to maximize the benefit from federal grant programs by positioning those CDBG-DR funds as a local match to other federal funding streams, in this case, the FEMA Public Assistance allocation

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for electrical grid reconstruction. Currently, PRDOH is in the planning phase, developing program guidelines, policies, and procedures, as required by HUD, to promptly implement these programs to help improve Puerto Rico's electrical power system in a resilient manner.

Regarding the extension for the public comments submission period, the CDBG-MIT Action Plan Amendment 1 (Substantial) was available during a thirty-eight-day (38) timeframe from July 12th, 2022, to August 19th, 2022. This comment period provided individuals and stakeholders with the opportunity to submit their comments and recommendations, while balancing the need to timely implement these critical programs.

056

Comment ID:

08/19/22\_E\_NGO\_EARTHJUSTICE\_Ana C. Correa(1)

Comment:

*Earth Justice comments begin with agreeing with the analysis regarding the grave risks posed by Puerto Rico's centralized, fossil-fuel-based electric grid and explain why, in light of that analysis, PRDOH should expand funding for distributed clean resources. They express that, to achieve the resilient, reliable, independent electric grid that PRDOH makes clear is needed, it should greatly expand the amount dedicated to distribute solar and storage throughout the archipelago and ensure that ample funding from the Community Energy and Water Resilience Installations Program goes to the low-income Puerto Ricans who need it most.*

*The entity also recommends that PRDOH should remove all references to the ER1 Cost-Share Program in this Substantial Amendment, which they believe has already been rejected by HUD (after review of the CDBG-DR Electrical Systems Enhancements Action Plan), as that program would rely on the FEMA Programmatic Environmental Assessment. They conclude that the PEA violates the National Environmental Policy Act, violates Puerto Rico energy law and policy, conflicts with Congressional directives in the Disaster Mitigation Act and the Disaster Recovery Reform Act, and undermines the current Administration's Executive Orders on Climate Change and Environmental Justice.*

*Finally, they also request PRDOH extends the deadline for public comment by a reasonable period, to allow all Puerto Rico stakeholders and interested members of the public to provide comments.*

PRDOH Response:

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PRDOH thanks you for taking the time and effort to review and comment on this proposed CDBG-MIT Action Plan Amendment.

As to your concerns and suggestions related to the Energy Grid Rehabilitation and Reconstruction (ER1) Cost Share Program, we wish to clarify those items. First, the ER1 program was proposed and included in the CDBG-DR Electrical Power System Enhancements Action Plan, subject to the provisions of the Notice 86 FR 32681 (June 28, 2021) and the allocation of funds provided therein, while the Community Energy and Water Resilience Installations (CEWRI) Program exists in various iterations

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under the original CDBG-DR and CDBG-MIT Action Plans. As per HUD requirements contained in the respective Federal Register Notices, PRDOH is barred from using funds from one allocation for activities that fall under a different one. As such, funds that were identified for the ER1 Program under the CDBG-DR Electrical Power System Enhancements Action Plan cannot be assigned to any of the CEWRI programs, either under CDBG-DR or CDBG-MIT.

Furthermore, the ER1 Program has not been rejected by HUD. Its final approval is pending PRDOH clarification of certain points. To that end, PRDOH is working closely with COR3 to identify potential projects that will be funded under the ER1 Program to comply with HUD's requirements and gain access to the complete allocation. The purpose of this Program will be to maximize the benefit from federal grant programs by positioning those CDBG-DR funds as a local match to other federal funding streams, in this case, the FEMA Public Assistance allocation for electrical grid reconstruction. Currently, PRDOH is in the planning phase, developing program guidelines, policies, and procedures, as required by HUD, to promptly implement these programs to help improve Puerto Rico's electrical power system in a resilient manner.

Regarding the extension for the public comments submission period, the CDBG-MIT Action Plan Amendment 1 (Substantial) was available during a thirty-eight-day (38) timeframe from July 12th, 2022, to August 19th, 2022. This comment period provided individuals and stakeholders with the opportunity to submit their comments and recommendations, while balancing the need to timely implement these critical programs.

057	Comment ID:	08/19/22_WP_NGO_Justicia Energetica para PR Inc_Waleska Rivera(1)
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*"August 19, 2022.  
To: Hon. William Rodríguez  
Secretary  
Department of Housing  
Commonwealth of Puerto Rico*

*RE: REQUEST FOR 30-DAY EXTENSION FOR THE PUBLIC COMMENT PERIOD ON THE PROPOSED FIRST SUBSTANTIAL AMMENDMENT TO CDBG-MIT ACTION PLAN*

Comment:

*Hon. William Rodriguez, Secretary,*

*Justicia Energetica para PR, Inc. hereby request that the public comment period on the Substantial Amendment to the CDBG-MIT Action Plan be extended by 30 days. Justicia Energetica is a local non-profit that has previously submitted throughout comments to PRDOH on their HUD plans, most recently the CDBG-DR Action Plan. It is essential for us and a host of interested parties including communities and NGO's that the public comment period be extended beyond August 19th to assure a*

comprehensive review, understanding and comment on this critical action plan.

As you know, there are 6 Programmatic Areas and 9 Impact Programs which amount to an investment of over \$8.0 billion dollars for Mitigation projects, programs and initiatives for Puerto Rico. The dramatic outreach of this historic effort requires a parallel dramatic effort to promote and cause a strong public participation. Regarding this matter, ICSE, Justicia Energética and other NGO's are committed to join efforts with PRDOH and HUD to effectively disseminate knowledge the historic impact of this reconstruction effort. The extended period requested is critical for our joint success to get the money where the needs are located.

We expect that the 30 day extension will allow ICSE and other NGO's to coordinate public participation, expand awareness, knowledge and discussion efforts among multiple organizations so the pooling of resources and drafting of shared ideas and final comments by allies and us greatly enhances the eventual participation of private sector resources in the final the action plan.

We, thank you in advance for considering an additional thirty (30) days, extending the deadline for public comment to September 19th, 2022, thus encouraging further stakeholder meetings and pooling of private sector resources that ICSE again commits to with you.

Sincerely,

Waleska Rivera  
President"

PRDOH  
Response:

Dear Members of the PR Energy Justice Organization, thank you for participating in our public comment period. We have received your attached materials and acknowledge receipt of your request for an extension after the close of the public comment period regarding the CDBG-MIT Action Plan Amendment 1 (Substantial). The CDBG-MIT Action Plan Amendment 1 (Substantial) was available for public comment submissions during a thirty-eight-day (38) timeframe from July 12th, 2022, to August 19th, 2022. This comment period provided individuals and stakeholders with the opportunity to submit their comments and recommendations, while balancing the need to timely implement these critical programs.

058	Comment ID:	08/19/22_WP_NGO_UPR Resiliency Law Center (Centro Legal de Desarrollo de Resiliencia de la UPR)_Naudelis Fernandez Reyes(1)
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The University of Puerto Rico's Resilience Development Legal Center (RDLC) is an initiative of the UPR School of Law that seeks to shift the balance of power to local communities in order to ensure that the recovery and rebuilding of Puerto Rico is effective, just and resilient and that climate change issues are addressed expeditiously. The RLC supports entities that seek to promote equitable and sustainable recovery and combat climate change, ensure a fair distribution of government funds, and promote the resilience needed in our communities.

The RDLC agrees with the clarification made in the APA draft that the property ownership requirement can be demonstrated through an ownership interest in the occupied structure eligible for the Single-Family Housing Mitigation Program. However, they emphasize the importance of ensuring that the ownership interest is applied uniformly to all families, as there have been denials of these funds to families due to alleged ownership problems.

Comment:

Additionally, they express concern that the draft does not explain the reason for the elimination of "housing rehabilitation" as an eligible activity under the Social Housing Mitigation and the Multi-Sector Community Mitigation Program. The question and concern arise as to how communities and families will be assisted after the elimination of housing rehabilitation as an eligible activity under the program, especially when we are aware of a significant number of families that have been denied assistance under the R3 Program. They go on in more detail to express concern for the proposed project for the Extension of the PR-22 highway and what they understand as instances of non-compliance with CDBG-MIT requirements.

Finally, the RDLC urges PRDOH to consider their comments, comply with relevant federal requirements established by HUD and the Public Environmental Policy, and protect the environment, the economy, and the communities from Manatí to Aguadilla that would be impacted by the proposed PR-22 extension project. In addition, we reiterate the importance of robust citizen participation in all programs under CDBG-MIT and CDBG-DR funds to achieve social and environmental justice.

PRDOH  
Response:

PRDOH thanks you for your participation. We acknowledge the importance of academic legal entities in the Action Plan Amendment process. PRDOH is committed to prioritizing mitigation assistance to households with uninhabitable immediate threats due to damages from recent disasters or hazardous events and under immediate threat due to damage from recent events. The program offers individual flood and landslide threatened homeowners the option to investigate the feasibility of elevating their homes, reinforcing the properties' foundations, or the alternative option for voluntary relocation, as specified in the Action Plan.

Housing rehabilitation is permitted under Section 105(a)(4) which is included in Plan.



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The Proposed Project PR-22 Extension was evaluated during the preparation of the initial Action Plan. This information was data collection effort at one point in time that has concluded. The projects listed in Appendix D only serve as an example of potential projects that may apply under CDBG-MIT Programs.

Once the mitigation programs are launched, eligible applicants may submit their projects to be considered to receive funds for assistance. The projects will be evaluated by PRDOH following the criteria established in the Action Plan, and detailed in the program guidelines, prior to receiving any funds. Details of the process to apply for funding will be outlined in the Program Guidelines for each Program. Please visit the PRDOH website at <https://cdbg-dr.pr.gov/en/download/program-guidelines/> (English) and <https://cdbg-dr.pr.gov/download/guias-programaticas/> (Spanish), where these guidelines will be published.

059	Comment ID:	08/19/22_WP_NGO_Instituto de Competitividad y Sostenibilidad Economica de Puerto Rico (ICSE) - Institute for Economic Competitiveness & Sustainability of Puerto Rico_Josen Rossi(1)
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"August 19, 2022  
To: Hon. William Rodríguez  
Secretary  
Department of Housing  
Commonwealth of Puerto Rico

RE: REQUEST FOR 30-DAY EXTENSION FOR THE PUBLIC COMMENT PERIOD ON THE PROPOSED FIRST SUBSTANTIAL AMENDMENT TO CDBG-MIT ACTION PLAN

Hon. William Rodriguez, Secretary,

Comment:

We encourage the US Department of Housing and Urban Development (HUD) and the PR Department of Housing (PRDOH) in its ongoing effort to enhance the public comments and participation efforts pertaining to Planning and Programming of Congress appropriation of taxpayers moneys and private sector investment in building back better Puerto Rico.

We hereby request now that the public comment period on the Substantial Amendment to the CDBG-MIT Action Plan be extended by 30 days.

ICSE is a local non-profit that has previously submitted throughout comments to PRDOH on their HUD plans, most recently the CDBG-DR Action Plan. ICSE actively participates, convenes, and nurtures consensus building in the governance and the public participation and intervention of basic infrastructure for Puerto Rico. Over the last five years our efforts have focused on bringing together expert knowledge leaders, researchers, energy planners and intervenors in the regulatory framework and policy mandates of Puerto Rico Act 17 Energy Policy of 2019. We also convene and provide subject matter expert education to business and

community leaders with formal and informal alliances. The formal alliances include other public interest organizations like Justicia Energética para-Puerto Rico Inc., a non-profit and the PR Manufacturers Business Association.

It is essential for us and the allied NGO's that the public comment period be extended beyond August 19th, to assure a robust review and comment on this critical action plan. As you know, most non-profit organizations do not have a deep pool of specialized personnel dedicated exclusively to the legal and programmatic review of these very important and seemingly complex government processes.

As you know, there are 6 Programmatic Areas and 9 Impact Programs which amount to an investment of over \$8.0 billion dollars for Mitigation projects, programs and initiatives for Puerto Rico. The dramatic outreach of this historic effort requires a parallel dramatic and almost unheard-of effort to promote and cause a strong public participation. Regarding this matter, ICSE, Justicia Energética and other NGO's are committed to join efforts with PRDOH and HUD to effectively disseminate knowledge the historic impact of this reconstruction effort. The extended period requested is critical for our joint success to get the money where the needs are located.

We expect that the 30-day extension will allow ICSE and other NGO's to coordinate public participation, expand awareness, knowledge and discussion efforts among multiple organizations so the pooling of resources and drafting of shared ideas and final comments by allies and us greatly enhances the eventual participation of private sector resources in the final the action plan.

We, thank you in advance for considering an additional thirty (30) days, extending the deadline for public comment to September 19th, 2022, thus encouraging further stakeholder meetings and pooling of private sector resources that ICSE again commits to with you.

Sincerely,

Josen Rossi  
Chairman of the Board  
Institute for a Competitive and Sustainable Economy  
of Puerto Rico  
[Tel 787.579.5742]  
P.O. Box 2128, San Juan, PR 00922-2128  
[Email] jerossi@icsepr.org"

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PRDOH  
Response:

Dear Members of the Institute for Economic Competitiveness and Sustainability of Puerto Rico, thank you for participating in our public comment period. We have received your attached materials and acknowledge receipt of your request for an extension after the close of the public comment period regarding the CDBG-MIT Action Plan Amendment 1 (Substantial). The CDBG-MIT Action Plan Amendment 1 (Substantial) was available for public comment submissions during a thirty-eight-day (38) timeframe from July 12th, 2022, to August 19th, 2022. This comment period provided individuals and stakeholders with the opportunity to submit their comments and recommendations, while balancing the need to timely implement these critical programs.

060	Comment ID:	08/19/22_WP_NGO_SESA-PR (Solar & Energy Storage Assoc. of PR) _Javier Rúa-Jovet(1)
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RE: SESA-PR COMMENTS TO CDBG-MIT ACTION PLAN SUBSTANTIAL AMENDMENT, "COMMUNITY ENERGY AND WATER RESILIENCE INSTALLATIONS PROGRAM" and "SINGLE-FAMILY HOUSING MITIGATION PROGRAM"

To the Honorable Secretary:

Comes now SESA-PR, the Solar and Energy Storage Association of Puerto Rico, to comment the Puerto Rico Housing Department's (Vivienda) proposed substantial amendment to the Action Plan for Community Development Block Grant-Mitigation (CDBG-MIT). Our overarching comments and urgent requests focus on:

Comment:

1. Limiting funding for residential solar & storage only to lowest-income / neediest families, defined by HUD to be those below 30% of the Average Medium Family Income level (AMFI); and defining this lowest-income category with an existing pre-qualified program for ease of administration;
2. Reinstating incentives for Businesses supporting one of the FEMA lifelines (ie, providing food & other essentials during future blackouts);
3. Implementing lessons learned by nonprofits that spent millions on equipping hospitals, clinics other critical facilities and residences with solar + storage in the aftermath of María in the Community Installations systems program. (ie Direct Relief, Red Cross, Hispanic Federation & others).
4. Request for extension of time for public comments, and stakeholder engagement meeting.

COMPLETE DETAILED COMMENT IN UPLOADED FILE

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PRDOH thanks the Solar & Energy Storage Association of Puerto Rico (SESA-PR) for participating during the public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). Your comments have been recorded and will be taken into consideration.

PRDOH is thankful for SESA-PR support in the removal of water as part of the activities in Community Energy Installations and Water Resilience Program for households (CEWRI-HH). This change provides an opportunity to address unmet energy needs for households providing them with a solution during prolonged off-grid disaster events that may interrupt energy services. PRDOH also acknowledges SESA-PR's proposal to use an income eligibility threshold of 30% AMFI rather than 80% AMFI and recommendation that PRDOH utilize alternative methods for income eligibility documentation such as other federal programs, as applicable.

PRDOH has taken your recommendation into consideration and will incorporate the very-low-income category as a starting point for outreach and implementation within the LMI pool of applicants. Additionally, we will evaluate the use of other federal program documentation for use in verifying income and are open to adopting its use so long as the other federal standards align with HUD requirements.

We acknowledge SESA-PR support on limiting the Home Energy Resilience Improvements Program to homeowners. Regarding the clarification on the priority designation in the program, PRDOH will review the language to ensure that it reflects the correct changes accurately. For the recommendations regarding the Incentive Program, PRDOH recognizes SESA-PR's concern with maintaining the priority categories. However, SESA-PR has also recognized the importance of simplifying the process of energy programs. It is PRDOH's belief that the elimination of priorities, in this instance, will accelerate the implementation of the program, while still allowing vulnerable populations to participate. Additionally, serving the critical workforce is one of the reasons that prompted PRDOH to allow access to moderate-income homeowners to participate in the Incentive program. Regarding the recommendation for reincorporation of businesses as eligible entities, PRDOH acknowledges other programs such as the "Apoyo Energético" program offered by the Department of Economic Development and Commerce (DEDC) as funded by the American Rescue Plan Act (ARPA). Additional opportunities for business incentives may result from the United States Inflation Reduction Act, and we encourage industries to monitor the rollout of that major program.

PRDOH  
Response:

For the Single-Family Mitigation Program, SESA-PR requested a clarification on whether water and energy installations will be included in the program budget. PRDOH acknowledges this recommendation and will verify the Action Plan to ensure that this clarification is made.

Regarding the definition of "urgent mitigation need" the CDBG-MIT Action Plan states that PRDOH will utilize the new urgent need mitigation (UNM) national objective criteria found at Federal Register Vol. 84, No. 169 (August 30, 2019), 84 FR 45838, that is applicable to CDBG-MIT funds only.

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This national objective requires activities funded with the CDBG–MIT allocation to result in measurable and verifiable reductions in the risk of loss of life and property from future disasters and to yield community development benefits. PRDOH recognizes SESA-PR's recommendation to target assistance to households in certain geographic areas and will evaluate the potential of this proposal. PRDOH is also grateful for the list of stakeholders shared by SESA-PR and will be adding these entities as part of the contact list for energy outreach efforts.

SESA-PR requested an extension of public comments. The CDBG-MIT Action Plan Amendment 1 (Substantial) was available for public comment submissions during a thirty-eight-day (38) timeframe from July 12th, 2022, to August 19th, 2022. This comment period provided individuals and stakeholders with the opportunity to submit their comments and recommendations, while balancing the need to timely implement these critical programs.

Once again, we thank you for submitting your recommendations during the public comment period, and recognize the essential input provided by non-government organizations' participation such as SESA for the development and implementation of the CDBG-MIT Action Plan.

061	Comment ID:	08/19/22_WP_PS_LUMA Energy_LUMA Energy (1)
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*LUMA Energy's comments mainly focus on the Community Energy and Water Resilience Installations (CEWRI) Program. LUMA understands that federal funds and the collaboration of different entities are an essential part of improving Puerto Rico's electrical system. They wish to work together with PRDOH and other stakeholders and adopt a coordinated approach for the benefit of Puerto Rico.*

Comment:

*LUMA supports PRDOH's prioritization of projects that:*

- Reduce the impact of climate change, such as those using renewable sources of energy*
- Improve the efficiency of electric power generation, electricity transmission and distribution infrastructure, and*
- Decrease transmission and distribution losses, thereby minimize the consumption of fossil fuels in power generation.*
- LUMA recommends that during the design and implementation phases of the CEWRI Program, PRDOH carefully consider, among other things: grid visibility to ensure system level resiliency. Also, potential for controllability in the future, technical specifications to support large-scale deployment of technologies, and partnerships.*

To provide customers access to cleaner, more reliable, and more affordable electricity through the integration of solar generation and energy storage into the larger grid, LUMA would encourage deployment of grid sensors at the point of interconnection. LUMA would do this in order to provide the grid operator, the enhanced observability needed to improve resiliency and support the integration of distributed energy resources (DER) like solar PV and energy storage. Additionally, LUMA encourages PRDOH to define a larger vision for the utility deployment of AMI and ADMS, as well as a structured process to support third-party, as well as privately owned microgrids. Lastly, LUMA encourages PRDOH to explore a potential partnerships with stakeholders and acknowledge electric utility, on identifying an electrically defined area where multiple customers would have solar and storage deployed to it, and the electric utility would interconnect these DERs into the grid to further demonstrate the value of these technologies.

PRDOH acknowledges the receipt of LUMA's comments during the public comment period for the CDBG-MIT Action Plan Amendment 1 (Substantial). Your comments have been recorded and will be taken into consideration.

LUMA recommends the incorporation of grid sensors into PRDOH programs that result in behind-the-meter solar energy generation. To make the most informed decision on this recommendation, PRDOH invites LUMA to provide additional information regarding the grid sensor costs, installation specifications, and if this installation is most applicable for single-family home programs, like CEWRI-HH or Community/Micro Grids under CEWRI-Community Installations.

PRDOH  
Response:

Regarding the recommendation for a structured process to support third-party and/or privately owned microgrids, we welcome more specific information regarding the proposed structured process.

PRDOH also acknowledges LUMA's recommendation to collaborate on "electrically defined areas." PRDOH welcomes this collaboration; however, such collaboration requires LUMA to provide detailed geographic and grid-specific data to PRDOH by which we can evaluate the composition of the proposed areas. Additionally, such data would need to be evaluated in a transparent way for it to be utilized for program priority designation. We look forward to this collaborative partnership with LUMA and value the coordination thus far.

Thank you for your comments regarding the CDBG-MIT Action Plan. PRDOH acknowledges your organization's support to refine the CDBG-MIT Action Plan and benefit Puerto Rico's citizens.

062

Comment ID:

08/20/22\_WP\_NGO\_PUERTO RICO CLIMATE CHANGE COUNCIL\_Ernesto L. Diaz(1)



The Puerto Rico Climate Change Council (PRCCC) is a voluntary, self-convened association with a membership of over 150 researchers and collaborators from federal and state agencies, public and private universities in Puerto Rico, the Caribbean and the United States, non-profit organizations, and private companies. PRCCC is represented by leading scientists, ecologists, oceanographers, planners, engineers, architects, anthropologists, social communicators, and independent researchers, among others. In their comment, they cite a series of relevant studies they have published and collaborated on. They believe that climate conditions, hazards, risks, and vulnerabilities specific to Puerto Rico will contribute to optimizing the investment of CDBG-MIT funds, and they make themselves available to contribute and update the information used in the Mitigation Plan for Puerto Rico.

Comment:

The PRCCC is concerned that financing infrastructure projects that must comply with current federal and state legislation, regulations, and building codes applicable to Puerto Rico means building to pre-Hurricanes Irma and Maria (2017) conditions. As well as the regulations and codes in place prior to the earthquakes (2019-2020) that brought so much destruction to Puerto Rico. Additionally, although the methodology and approach used in the development of the Mitigation Plan for Puerto Rico contributes to developing an approximate diagnosis of the current situation of the socio-ecological systems, they have detected information not applicable to Puerto Rico, and that has not updated.

PRCCC also worries, some identified risks are not common events in Puerto Rico and are placed above other hazards that have caused deaths and severe respiratory disorders on Puerto Rico. For example, heat waves. It is of concern to them that the data, information, and knowledge specific to Puerto Rico endorsed by the USGCRP and peer-reviewed journals has not been consulted and was used in the development of the Plan. They note that the CDBG-MIT Action Plan relies on the 2016 version of the Mitigation Plan for Puerto Rico, which was updated in 2021, but ignores recent information on natural hazards affecting Puerto Rico, which are exacerbated by climate change.

PRDOH  
Response:

Climate change considerations are an integral part of mitigation and resilience activities. Projects under CDBG-MIT programs should address and/or include current reliable climate data, among the array of factors required for mitigation activities. PRDOH appreciates the recommendations and comments made by the Puerto Rico Climate Change Council and will consider the information provided as part of the CDBG-MIT APA1 approval process. Climate change factors are among the key components considered for an improved mitigation project. In addition to weather factors, compliance with the applicable laws and regulations is vital for any mitigation project. PRDOH has determined that infrastructure within each of the 7 lifelines could benefit from modernization and investment in retrofits to meet requirements of the latest International Building Code 2018 requirements adopted by the Government of Puerto Rico. New construction that incorporates self-sustaining systems lessens the dependence on fragile centralized systems,



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thereby promoting resilience. Built-in redundancy and utilization of green infrastructure is key. Improved coordination and governance between institutions, regional problem-solving collaboration, and systems that improve digital data collection, sharing, and dissemination are essential in this endeavor.

Given the reality of living in the tropics, prone to an annual hurricane season, it is imperative that projects supported with these funds enhance resources to make Puerto Rico resilient to future weather events. PRDOH will implement construction methods that emphasize quality, durability, energy efficiency, sustainability, and mold resistance. Reconstructed and newly constructed homes will be designed to incorporate principles of sustainability, including water and energy efficiency, and mitigation against the impact of future shocks and stressors. Residential and Infrastructure construction performed under the programs will adhere to the Puerto Rico Codes and applicable laws and regulations and encourage compliance with the Green Building Standards. The Green Building Standards mean that PRDOH will encourage that all applicable construction meets an industry-recognized standard or certification under at least one (1) of the programs identified in the CDBG-MIT APA 1. Additionally, PRDOH will require project applicants to include a plan detailing necessary resources for the operation and maintenance costs of projects assisted with CDBG-MIT funds.

Thank you for your comments regarding the CDBG-MIT Action Plan. PRDOH acknowledges your organization's support to refine the scope of the CDBG-MIT Action Plan and benefit Puerto Rico's citizens.

063	Comment ID:	08/20/22_WP_PS_Puerto Rico Chamber of Commerce_Liza Garcia(1)
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*August 19th, 2022*

*To: Hon. William Rodríguez Secretary Department of Housing Commonwealth of Puerto Rico*

*RE: COMMENTS TO CDBG-MIT ACTION PLAN SUBSTANTIAL AMENDMENT*

*To the Honorable Secretary:*

Comment: *Comes now the Puerto Rico Chamber of Commerce (PRCC), Voice and Action of Private Enterprise in Puerto Rico to provide comment on the proposed CDBG-MIT Action Plan Substantial Amendment. PRCC represents over 500+ businesses in Puerto Rico.*

*General Comment*

*The exorbitant, and increasing, cost of grid energy in Puerto Rico, as well of the lack of quality and consistency of said utility power is a major barrier to business in the island. Puerto Rico businesses, and particularly small and medium business (PYMES) are the engine that drives Puerto Rico's job*

generation and economy, and their success and resilience must be secured. CDBGMIT can be critical to improve that situation. Our comments focus on the \$500 million program titled "COMMUNITY ENERGY AND WATER RESILIENCE INSTALLATIONS PROGRAM", particularly the solar plus storage incentive for businesses element, which we strongly support.

*B. Specific Comments*

*Regarding "INCENTIVE" subprogram:*

*In pages 386-387 of the proposed CDBG-MIT Action Plan the proposed amended language intends to delete a "\$1,500,000 per business" solar plus storage incentive. PRCC strongly opposes deletion of this program. We are now nearing the peak of the 2022 hurricane season, and PRCC has not observed either substantial grid improvements nor energy price stability, so this type of incentive is sorely needed. PRCC, also requests specific stakeholder participation to land the details in Program Guidelines for this, and other incentives. For example, would this be a \$1,500,000 per entity or per facility incentive, in case of multiple-facility business? PRCC is unaware of any stakeholder collaboration on topics like these.*

*2. PRCC is also supportive of more specific comments filed by SESA-PR, the expert entity that voices the particular concerns of the entities that do business in Puerto Rico in the solar and storage space, and defers to SESA-PR's policy expertise.*

*Yours,*

*Liza M. García Vélez, Esq.  
Executive Director*

PRDOH thanks you for taking the time to review and comment on this proposed amendment to the CDBG-MIT Action Plan. Elimination of the Installation awards for businesses under the CEWRI program responds to the need to focus the use of Mitigation funds on impacted and at-risk individuals and communities.

PRDOH  
Response:

Nevertheless, we invite you to visit the CDBG-DR Electrical Systems Enhancements and Improvements Action Plan, available at <https://cdbg-dr.pr.gov/en/download/cdbg-dr-action-plan-for-the-electrical-systems-enhancements-effective-on-march-25-2022/> (English) and <https://cdbg-dr.pr.gov/download/plan-de-accion-cdbg-dr-para-la-optimizacion-de-la-red-electrica-efectivo-el-25-de-marzo-de-2022/> (Spanish), which contemplates a set-aside of up to \$30,000,000 for the Department of Economic Development and Commerce (DEDC) to use in their Energy Support Program ("Programa de Apoyo Energético"). Through the Energy Support Program, DEDC is using a \$20,000,000 allocation of American Rescue Plan Act (ARPA) funds to provide financial assistance to small businesses for their acquisition of renewable energy resilience measures.

064

Comment  
ID:

08/20/22\_WP\_NGO\_Center for Habitat Reconstruction\_Luis Galalrdo(1)

Center for Habitat Reconstruction (CRH) congratulates PRDOH on an excellent CDBG-MIT Action Plan and is grateful for the incorporation of activities related to addressing property vacancy and abandonment. The CRH is the only non-profit organization in Puerto Rico dedicated exclusively to tackling the problem of vacant and abandoned properties as part of a comprehensive cross-sectoral approach. They have recently published an investigation with support from the University of Colorado and their National Hazards Center titled, "The Public Health Implications of Abandoned Spaces in Post-Maria Puerto Rico".

*General recommendations:*

CRH asks that the PRDOH reconsiders the need to request a waiver for national objective criteria to eliminate slum and blighting conditions (p. 271). Their own preliminary discussions with representatives of HUD lead us to believe that if a formal request is presented, that said waiver could very well be obtained. The CRH is more than willing and available to collaborate with PRDOH and assist make the case for said waiver.

Instances where Puerto Rico is referred to as an "island" should be replaced with "archipelago". The CRH works extensively with the Municipality of Culebra and its communities and are fully aware of the stigma and exclusion often suffered by its residents.

CRH emphasizes that non-profits with less than five years of experience in the management of federal funding should not be excluded from receiving grants. The Whole Communities Resilience Program (WCRP) for example, disqualified a bulk of organizations due to not meeting this requirement.

Comment:

*Specific Program-related suggestions:*

*Recommendation #1: Strengthen activities related to the identification of vacant properties in the Risk and Asset Data Collection Program, and if possible, make them obligatory for local governments.*

*Even after properties are declared nuisances, there is constant data maintenance and case management that needs to be carried out. Considering this, CRH suggest that the Risk and Asset Data Collection Program not be closed out per se, and instead be kept active throughout following years to assist local governments conserve and update their data.*

*CRH feels that the Risk and Assessment Data Collection Program should create a uniform module and methodology for vacant and abandoned property data collection. Also, that said activity either be required from all municipalities or that there be a pre-designed activity that municipalities could "plug in".*

*Recommendation #2: Permit activities related to the maintenance of vacant property data as well as nuisance declaration through the Mitigation and Adaptation Policy Support Program and/or Planning and Capacity Building Program.*

The Action Plan contemplates the development policy toolbox that includes best practices, model ordinances, funding models, and other regulatory documents that can be adapted to local circumstances. CRH is willing and able to meet and collaborate with PRDOH to jointly create and publish a revised version of its guidebook for free distribution among municipalities to complement CDBG-MIT Program implementation.

The CRH also advocates for the need to create a series of in-person and online workshops for municipalities throughout the archipelago. CRH has already designed a training module for nuisance identification, abatement, and acquisition. CRW would be more than willing to meet and collaborate with the PRDOH to adjust said curriculum to the CDBG-MIT's needs as well as coordinate pilot training sessions.

*Recommendation #3: Adjust the Single-Family Housing Mitigation Program to prevent and leverage vacant and abandoned properties. The Plan should specify in the Program's Eligibility Criteria (p. 348) that a property may include those that no longer being used as primary residence, but that it was prior to hurricanes Irma and María and has since been vacated.*

The current Plan states that the properties obtained by PRDOH will be demolished and preserved as greenspace. As is, PRDOH and the Action Plan lack a formal strategy to prevent that unused spaces from turning into public nuisances. CRH suggests that PRDOH contemplate and budget reuse activities to prevent future public nuisances. These reuse activities can be low-cost and can even contribute to the mitigation of natural disasters and flooding in the surrounding community. Properties identified for possible relocation should at all times emphasize vacant and abandoned properties over new construction. Vacant and abandoned properties should be referred to specifically in p. 350 paragraph 4.

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Thank you for your comments regarding the CDBG-MIT Action Plan. PRDOH acknowledges your organization's support to refine the scope of the CDBG-MIT Action Plan and benefit Puerto Rico's citizens. PRDOH also acknowledges the receipt of Center for Habitat Reconstruction (CRH) comments. We wish to inform you PRDOH does not currently intend to request a waiver permitting the use of the national objective criteria for elimination of slum and blighting conditions, as HUD has clarified at 84 FR 45838, 45857 that this national objective generally is not appropriate in the context of mitigation activities.

PRDOH  
Response:

PRDOH will take under advisement your valuable suggestions regarding vacant property data and preventing nuisances. Likewise, we will be mindful to use the correct term when referring to Puerto Rico. For future Notices of funding availability, we will also take into account the bulk of non-profits that have the capacity to perform the services requested.

While CDBG-DR is focused on disaster recovery, CDBG-MIT is focused on increasing resilience to disasters and reducing or eliminating the long-term risk of loss of life, and damage or loss of property, thereby reducing the impact of future disasters. For this reason, the Single-Family Housing Mitigation Program will award funds to homeowners with uninhabitable residences and/or residences under immediate threat.

065	Comment ID: 08/22/22_E_NGO_Puerto Rico por el Derecho a una Vivienda Digna (PRODEV)_Carmen Villanueva(1)
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Comment:

*The comments of Puerto Rico por el Derecho a una Vivienda Digna (PRODEV) focus on the following items: PRODEV agrees with the execution repairs to the electrical power system following the requirements established for the use of CDBG-MIT funds on the Federal Register Notice for Electrical Power System Improvements in consultation with HUD. PRODEV suggests PRDOH adapt the language of the Single-Family Housing Mitigation Program to recognize the property interest of residents in a more flexible manner. In an to effort help demonstrate ownership of the property despite lack of title. For the Infrastructure Mitigation Program, the entity suggests adopting definitions for concepts like community development, recognizing the work of supporting grassroots community organizations and the active participation of residents, who become the protagonists of improvements. For the Community Energy and Water Resilience Installations (CEWRI) Program and Economic Development Investment Portfolio for Growth (IPG) Lifeline Mitigation Program, PRODEV recommends the Special Cases Panel be replaced with robust guidelines that direct the proponents in a uniform manner. On the other hand, the entity agrees that the healthcare facilities set-aside in the IPG Program are necessary to strengthen public health centers, and considers Centro Médico to be one of the facilities that can benefit the most vulnerable communities. In the Single-Family Housing Mitigation Program, PRODEV agrees with addressing the reality of the areas in urgent need and the recovery of existing squatted housing. In the Economic Development Plan*

for the Infrastructure Mitigation Program, PRODEV suggest coordinating efforts with federal agencies. Also, they suggest that those who will coordinate the use of such funds to maximize the resources allocated and increase the effectiveness of their use for Non-PRASA projects.

PRDOH  
Response:

Thank you for your recommendations. PRDOH acknowledges your organization support of the work accomplished to refine the scope of the CDBG-MIT Action Plan to benefit Puerto Rico's citizens. PRDOH also acknowledges the receipt of Puerto Rico por el Derecho a una Vivienda Digna (PRODEV) comments on the CDBG-MIT Action Plan Amendment 1 (Substantial). They have been recorded and will be taken into consideration. We are committed to be in constant communication and coordination with all the key local and federal agencies tasked with the administration of funds and activities related to Puerto Rico's resilient recovery.

As part of the amendments to the Single-Family Housing Mitigation Program under the CDBG-MIT Action Plan, eligibility requirements include: homeowners with clear ownership of an eligible single-family property or applicants with a proprietary interest in the occupied structure (including alternative methods of verification of informal ownership); homeowners must qualify as LMI (below 80% Area Median Family Income); and property must be the homeowner's primary residence. Specific details regarding eligibility requirements and program application process, among other relevant information, will be included in the Program Guidelines.

Regarding your suggestion on the Infrastructure Mitigation Program, PRDOH will take into consideration adopting that definition. Lastly, with respect to the Special Cases Panel for the Community Energy and Water Resilience Installations (CEWRI) Program, and the Economic Development Investment Portfolio for Growth (IPG) Lifeline Mitigation Program, the recent CDBG-MIT Action Plan Amendment 1 (Substantial), removed language referencing the Panel and recognized the review shall be governed by program-led procedure.

066	Comment ID:	08/22/22_E_NGO_Hispanic Federation _Maritere Padilla Rodríguez
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Comment:

August 18, 2022  
Hon. William Rodriguez Rodriguez  
Secretary  
Department of Housing of Puerto Rico  
w.rodriguez@vivienda.pr.gov  
legalCDBG@vivienda.pr.go

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Re: Extension request to comment on the first substantive amendment to the CDBG-MIT Action Plan.

Dear Secretary Rodriguez Rodriguez:

On July 12, 2022, the public comment period for the first substantial amendment to the CDBG-MIT Action Plan began. The deadline for comment is August 19, 2022.

In November 2020, the Hispanic Federation submitted comments on the CDBG-MIT Action Plan. Currently, our public policy task force is developing comments on several programs proposed in the first substantial amendment. However, it will not be possible to finalize them for submission by August 19, 2022. Therefore, the Hispanic Federation respectfully requests an extension of ten (10) business days to submit comments on the First Substantial Amendment.

At the same time and no less important, given the fact that the Citizen Advisory Committee (CAC) is not yet structured and constituted, we respectfully request an extension of time for the CAC to comment on the guidelines as a collective once it is constituted.

Finally, we acknowledge receipt of the extension of time granted to the Hispanic Federation to comment on the Global Matching Program (HMGP) Set-Aside Guidelines and the Cost Benefit Analysis Guidelines through communication on August 9, 2022. However, our original extension request was to the effect that, "given the fact that the CAC is not yet structured and constituted, we respectfully request an extension so that the CAC can comment on the guidelines as a collective once it is constituted". We therefore reiterate this request.

Cordially yours,  
f/Maritere Padilla Rodríguez  
Director of Public Policy and Advocacy  
mpadilla@hispanicfederation.org



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Dear Members of the Hispanic Federation,

PRDOH  
Response:

Thank you for participating in our public comment period. We have received your attached materials and acknowledge receipt of your request for an extension after the close of the public comment period regarding the CDBG-MIT Action Plan Amendment 1 (Substantial). The CDBG-MIT Action Plan Amendment 1 (Substantial) was available for public comment submissions during a thirty-eight-day (38) timeframe from July 12th, 2022, to August 19th, 2022. This comment period provided individuals and stakeholders with the opportunity to submit their comments and recommendations, while balancing the need to timely implement these critical programs.