



DEPARTMENT OF
HOUSING



CDBG-MIT Action Plan Public Comments

Table of Contents

- I. Introduction 3
- II. Public Comments..... 4

I. Introduction

Public comments regarding the Community Development Block Grant - Mitigation (**CDBG-MIT**) Action Plan were received in both English and Spanish during the 30-day public comment period that started on February 17, 2023, and ended on March 19, 2023.

For the reader's benefit, the comments submitted have been summarized in Spanish and English. The comments cited were sometimes paraphrased as part of the translation process and/or for reasons of brevity so that they could be presented in public televised hearings. Personally identifiable information has been removed from the comments to protect the commenter's privacy. Please refer to the text of the comments submitted for additional information.

Citizens may contact the Puerto Rico Department of Housing (**PRDOH**) to request a full translation of comments or alternative ways or formats to access them, including the responses provided by PRDOH. Requests can be made:

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

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

II. Public Comments

001	Comment ID: 02/21/23_WP_I_Susana Cortes(1)
Comment:	<p><i>I am very concerned because those of us who work and don't have enough money to subsist, move this country and pay contributions, don't qualify for programs that could ease our economic burden. For example, the solar energy assistance program. It is time for you to offer some kind of benefit for the sadly impoverished middle class.</i></p>
PRDOH Response:	<p>Greetings Susana Cortes,</p> <p>Our team at the Puerto Rico Department of Housing appreciates your participation during the public comment period for the second substantial amendment to the CDBG-MIT Action Plan. The Home Energy Resilience Improvements Program (CEWRI-HH) provides assistance to households for the purchase and installation of renewable solar energy equipment, which consists of a photovoltaic system (PVS) and a battery storage system (BSS). The CEWRI-HH Program is comprised of two subprograms known as the Home Energy Resilience Improvements Program and the Incentive Program. Our team at the Puerto Rico Department of Housing amended the CDBG-MIT Action Plan to indicate that applicants with up to 200% of the area median family income (AMFI) established by the U.S. Department of Housing and Urban Development (HUD) are eligible under the Incentive Program. This change was made to provide more Puerto Rican households with the opportunity to receive assistance to meet their urgent mitigation needs.</p> <p>For more information about the application process and general information about the CEWRI-HH Program, visit PRDOH web page available in English and Spanish at https://cdbg-dr.pr.gov/en/home-energy-resilience-improvements-program/ (English) and https://cdbg-dr.pr.gov/programa-de-mejoras-de-resiliencia-energetica-en-el-hogar/ (Spanish).</p>
002	Comment ID: 02/21/23_WP_I_Edwin Rivera(1)
Comment:	<p><i>You have to expedite the process of disbursing the money for first buyers there are many owners who do not want to accept the aid because of the delay that this entails and there are also many properties that need repairs not just paint and ceiling you must be more flexible when we are doing everything possible to have our first home and we don't even get qualified for properties we've seen that have things that even we can fix ourselves, water or electricity, a damaged light bulb, cabinets etc. We are competing with high interests also with companies that buy houses foreigners who are also exempt from many things is exasperating because</i></p>

I want to live in my country I hope they can amend certain processes for us and live in a house of our own in peace.

Greetings Edwin Rivera:

Thank you for your participation during the public comment period for the draft Second Substantial Amendment to the CDBG-MIT Action Plan. CDBG-MIT programs established under the CDBG-MIT Action Plan do not provide assistance for the purchase of a home. However, the Homebuyer Assistance Program (HBA) established by PRDOH through the CDBG-DR Action Plan offers families and individuals the opportunity to purchase a safe and decent property in order to remove financial barriers and facilitate the acquisition process.

PRDOH Response: According to the HBA Program Guidelines, the Program allows applicants to purchase homes that require repairs as long as they meet PRDOH eligibility criteria for rehabilitated properties. It is important to highlight that funds from the HBA Program cannot be used to carry out these repairs. Such repairs must be covered under the applicant's mortgage, and must be minor nonstructural repairs.

For additional information about the Homebuyer Assistance Program and its eligibility requirements, you can consult the HBA Program Guidelines, available in English and Spanish on PRDOH web page at: <https://cdbg-dr.pr.gov/en/download/homebuyer-assistance-program-2/> (English) and <https://cdbg-dr.pr.gov/download/programa-de-asistencia-directa-al-comprador-2/> (Spanish).

003	Comment ID:	02/21/23_WP_I_Iris Garcia Aponte(1)
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Comment: *Greetings, I didn't read the whole plan. I only leave my question regarding the funds to acquire a home, about the housing acquisition requirements I understand that it is fair to have limits and requirements, but how DIFFICULT it is to find a home that is not in a flood zone, all of Puerto Rico floods! What we can do, because many of us depend on that help. Due to inflation and living costs, it is difficult to pay a mortgage. We're not leaving our paycheck on the mortgage anymore! WE DEPEND ON THAT AID TO LOWER THE MORTGAGE PAYMENT!*

Greetings Iris Garcia Aponte:

PRDOH Response: Our team at the Puerto Rico Department of Housing acknowledges your comment and appreciates your participation during the public comment period for the second amendment to the CDBG-MIT Action Plan. The CDBG-MIT Action Plan does not have a program that provides assistance for acquiring a home. However, due to the information in your comment we understand that it refers to the Homebuyer Assistance Program (HBA) under CDBG-DR funds.

Through the ninth substantial amendment to the CDBG-DR Action Plan, the section for properties eligible for the Homebuyer Assistance (HBA)

Program was amended to remove the requirement that these properties could not be located in a Special Flood Hazard Area (SFHA) in order to receive assistance. The HBA Program establishes a budget of CDBG-DR funds to help bridge the gap between the amount of the first mortgage an applicant can obtain from a Lending Institution and the purchase price of a home. Assistance is provided to low- and moderate-income and urgent need people affected by Hurricanes Irma and/or María who are purchasing their primary residence. One of the objectives of the Program is to increase homeownership rates. This, in turn, fosters the long-term sustainability and economic viability of the communities affected by Hurricanes Irma and Maria throughout the Island.

For more information about the HBA Program and the procedures to follow, see the Program Guidelines, available at <https://cdbg-dr.pr.gov/en/download/homebuyer-assistance-program/> (English) and <https://cdbg-dr.pr.gov/download/programa-de-asistencia-directa-al-comprador/> (Spanish).

004	Comment ID:	02/21/23_WP_PS_Colmado el tren_Jonathanarroyo(1)
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Comment: None

Greetings Jonathan Arroyo:

PRDOH Response:

This public comment does not provide enough information for us to draft a response. However, we urge you to read the draft of the Second Substantial Amendment to the CDBG-MIT Action Plan available on PRDOH web page at <https://cdbg-dr.pr.gov/en/action-plan-mit/> (English) and <https://cdbg-dr.pr.gov/plan-de-accion-mit/> (Spanish) to learn about programs established under the CDBG-MIT funds. In addition, please visit the CDBG-MIT web page for information on the application process and/or general information on CDBG-MIT Programs launched or to be launched soon at: <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) or <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish), respectively.

005	Comment ID:	02/21/23_WP_I_Ramon Morales(1)
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Comment: *When is the proposed construction time for the Patillas dam*

Greetings Ramon Morales:

PRDOH Response:

Thank you for your comment. In Appendix N of the Covered Project for the Patillas Dam Seismic Retrofit, PRDOH includes the preliminary estimated development schedule for the proposed project. According to Appendix N, the preliminary schedule contemplates a timeframe of almost four (4) years for the project's implementation, which is divided into four (4) phases: conceptual design and analysis, engineering and design,

procurement, and construction. It is important to note the proposed schedule for the project is preliminary and is subject to change as its development progresses, and design and environmental review activities are completed. Similarly, the project will need to be approved by the U.S. Department of Housing and Urban Development (HUD) through this Second Substantial Amendment to the CDBG-MIT Action Plan before the development and implementation processes begin.

For more information on this proposed project, visit PRDOH web page to access Appendix N within the list of appendices proposed for the draft of the Second Substantial Amendment to the CDBG-MIT Action Plan available in English and Spanish at <https://cdbg-dr.pr.gov/en/action-plan-mit/> (English) and <https://cdbg-dr.pr.gov/plan-de-accion-mit/> (Spanish).

006	Comment ID:	02/22/23_WP_I_ivelisse Borrero(1)
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Comment: *Greetings. This aid is for entities only. Please I need help at my house for repairs due to the earthquakes. I appreciate any the information you can give me. God bless you*

Greetings Ivelisse Borrero:

PRDOH Response: Our team at the Puerto Rico Department of Housing appreciates your participation during the public comment period for the second substantial amendment to the CDBG-MIT Action Plan. Currently, PRDOH is responsible for administering the Home Repair, Reconstruction, or Relocation Program (R3) under CDBG-DR funds in response to the 2019-2020 Earthquakes and Tropical Storm Isaias in 2020. This Program is designed to assist people through the repair or reconstruction of homes damaged by disasters or relocating households that are located in a high-risk area. For more information about the R3 Program, see the CDBG-DR Action Plan for the 2019-2020 Earthquakes and 2020 Tropical Storm Isaias Response available in English and Spanish at <https://cdbg-dr.pr.gov/en/seismic-home-rehabilitation-and-reconstruction-action-plan/> (English) and <https://cdbg-dr.pr.gov/plan-de-accion-para-la-rehabilitacion-y-reconstruccion-de-hogares-por-sismos/> (Spanish).

007	Comment ID:	02/23/23_WP_I_Lucy Torres(1)
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Comment: *Response regarding my case, I need to contact Legal Division. Thank you for your prompt response.*

Greetings Lucy Torres:

PRDOH Response: Your comment does not provide sufficient information for us to identify the CDBG-MIT or CDBG-DR Program you are referring to. However, if you wish to know the status of your application, you should contact the CDBG-MIT or CDBG-DR Program you applied to directly to address any situation or concern.

On the other hand, PRDOH also provides citizens with the opportunity to file complaints, for the duration of each grant, about any issue related to the general administration of CDBG-DR/MIT funds. One of PRDOH's main priorities and responsibilities is to maintain an open communication regarding citizen concerns related to CDBG-DR/MIT programs. All complaints received will be addressed promptly and consistently provide, at the very least and to the extent possible, a substantial and timely response. To submit your complaint, visit <https://cdbg-dr.pr.gov/en/complaints/> (English) and <https://cdbg-dr.pr.gov/quejas/> (Spanish).

008	Comment ID:	03/09/23_WP_I_Jose M Roman Luciano(1)
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Comment: *I have not read the amendment and my request may be academic, it is about the 30,000, which can be decided in two companies one solar company and the other, water tank company, and thus provide for both in one go. I understand the 30,000 is enough for both. Thank you.*

Greetings José M. Roman Luciano:

PRDOH Response: Our team at the Puerto Rico Department of Housing acknowledges your comment and it will be taken into consideration during the review of the draft of the Second Substantial Amendment to the CDBG-MIT Action Plan. The Home Energy Resilience Improvements Program (CEWRI-HH) is focused on providing assistance to low- and moderate-income households with energy needs. Through this program, eligible applicants will be able to receive a grant of up to 100% of the cost of the system or \$30,000 (or less, depending on the cost of the equipment and installation) for the purchase and installation of renewable solar energy equipment, composed of a photovoltaic system (PVS) and a battery storage system (BSS).

Eligible applicants to the CEWRI-HH Program are responsible for contacting and choosing the renewable energy installation company (REIC). These companies are evaluated and approved by PRDOH, and then added to the official roster of installation companies registered under the CEWRI-HH Program.

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

009	Comment ID:	03/14/23_WP_I_Jesus Gomez(1)
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Comment:

*Installing companies do NOT know the information to qualify, enter or the requirements for the program.
They want to sell.
I live in Yabucoa.*

Greetings Jesus Gomez:

Thank you for your participation during the public comment period for the draft of the Second Substantial Amendment to the CDBG-MIT Action Plan. The Home Energy Resilience Improvements Program (CEWRI-HH) provides assistance to households for the purchase and installation of renewable solar energy equipment, which consists of a photovoltaic system (PVS) and a battery storage system (BSS).

PRDOH Response:

During the application process, eligible applicants to the CEWRI-HH Program are responsible for contacting renewable energy installation companies (REIC). These companies are approved by PRDOH, and then added to the official roster of installation companies registered under the CEWRI-HH Program. Once the applicant selects a REIC, they should receive a detailed estimate of the cost of the equipment and the installation services, which will be used as part of the intake package. If the information provided by the applicant in the intake packet is determined eligible according to the requirements established by PRDOH, the applicant may proceed with the acceptance of the award, and will sign a Reserve Grant Agreement along with the REIC. Thereafter, the applicant may hire the approved and participating REIC to install the system.

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

010	Comment ID: 03/14/23_WP_I_Sandra Olivieri Cano(1)
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Comment:

I wish to submit my comments once again to request the inclusion of the community at Urbanización Sierra Berdecía in Guaynabo in project number MAG-002MIT. As expressed in the first round of public comments, the proposed project includes the communities of Colinas de Guaynabo, Riveras de Honduras, Terrazas de Guaynabo, Colimar, and Villa Providencia Elderly Home as the communities affected by the slide and erosion in the Guaynabo River, for which this stabilization project is proposed. However, the community of Urbanización Sierra Berdecía does not appear on this list even when I lost my property on 2019 due to the situation with the Guaynabo River.

Today, due to the situation with the Guaynabo River, two communities have had significant damage that have been documented by the

Municipality and the corresponding government agencies. I, a retired school principal who gave thirty years of my life to the public education of this country lost my home and to this day the situation has not been addressed, the neighboring properties at what used to be my house are at imminent risk in case 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.

In the community of Colinas de Guaynabo there is at least one house at imminent risk, in my community Sierra Berdecía we've already lost two houses, my own included.

I have been in communication with the Planning Office of the Municipality of Guaynabo and its director, the 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 made the corresponding arrangements to present its comments to this draft making the claim of inclusion of Urbanización Sierra Berdecía.

As of today, the case of a property at risk located at Urbanización Colinas de Guaynabo has funds from the Department of Housing's R3 CDBG-DR Program 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", we are losing homes that cost us a lot of effort and in my case a lifetime of labor in the public service and for this reason I request the draft to be amended to include us as a community so that the situation can be addressed.

Our community at Urbanización Sierra Berdecía, and I particularly, is not requesting a special treatment. We request to be considered and included in the proposed projects so that we can see some solution to our situation.

Greetings Sandra Olivieri Cano:

Thank you for your participation during the public comment period for the Second Substantial Amendment to the CDBG-MIT Action Plan. The Proposed Project Number MAG-002 represents information collected and used by PRDOH for the preparation of the initial Action Plan. These projects listed in Appendix D serve as examples of potential projects that could be implemented under the CDBG-MIT programs.

PRDOH Response:

Nevertheless, the programs established under the CDBG-MIT Action Plan include the Multi-Sector Community Mitigation Program (MSC). The MSC Program provides socially vulnerable communities (or community sectors) that are experiencing socioeconomic and environmental disadvantages with the opportunity to relocate away from high-risk areas. This includes areas prone to landslides, severe floods, liquefaction, among other hazards.

Please visit the CDBG-MIT web page for information on the application process, eligibility requirements, among other details available in the Program Guidelines: <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) or <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish), respectively.

011	Comment ID:	03/14/23_WP_I_juanjl_10@live.com(1)
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Greetings,

Comment: [REDACTED] are waiting for PRDOH to proceed with the home purchase closing, my case number is [REDACTED]. We look forward to completing the closing process.

Greetings John:

PRDOH Response: According to the information provided in your comment, our team understands that you are referencing the Homebuyer Assistance Program (HBA) established under the CDBG-DR Action Plan. The HBA Program provides financial assistance to eligible buyers to purchase their primary residence. PRDOH referred your case to the Program's Subrecipient, the Puerto Rico Housing Finance Authority (PRHFA), to make sure they provide the information on the current status of your case. For additional information about the program and the application process, you can see the HBA Program Guidelines, available in English and Spanish on PRDOH web page at: <https://cdbg-dr.pr.gov/en/download/homebuyer-assistance-program-2/> (English) and <https://cdbg-dr.pr.gov/download/programa-de-asistencia-directa-al-comprador-2/> (Spanish).

012	Comment ID:	03/14/23_WP_I_Wilfredo Torres Mass(1)
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Comment: *I have incomplete paraplegia, I walk short distances using crutches and my condition is getting worse as the years go by. My apartment is on a second floor and I need to buy one of easy access. I applied to the funds and they didn't help me because I have property. Given my particular health condition, which prevents me to enter or complicates access, I think you should approve homebuyer assistance.*

Greetings Wilfredo Torres Mass:

PRDOH Response: Thank you for your participation during the public comment period for the draft of the Second Substantial Amendment to the CDBG-MIT Action Plan. According to the information provided in your comment, PRDOH understands that you are referencing the Homebuyer Assistance Program (HBA) under CDBG-DR funding. This program provides assistance for people who wish to purchase their home. For additional information about the program and the application process, you can see the HBA Program Guidelines, available in English and Spanish on PRDOH web page at:

<https://cdbg-dr.pr.gov/en/download/homebuyer-assistance-program-2/> (English) and <https://cdbg-dr.pr.gov/download/programa-de-asistencia-directa-al-comprador-2/> (Spanish).

013	Comment ID:	03/14/23_WP_I_Camilo Torres(1)
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Comment:

I find the projects presented very interesting and important. However, it seems to me that they should increase the maximum cost for qualifying houses for the homebuyer assistance programs. The efforts of the government have been precisely what promoted the arrival of millionaires and billionaires who have dedicated themselves to speculating with the Puerto Rican real estate market and have made the cost of housing dramatically more expensive. If we really want to promote the retention of professionals from the different disciplines that the program seeks to promote, it is essential that the parameters of the program, in terms of the maximum cost of qualifying housing reflect the reality of the market. Currently, the average cost of a home is well above the limits allowed for the homebuyer assistance programs. The properties available at the prices allowed by the programs fall far short of what a health professional may consider acceptable. Especially considering the shortage of doctors and healthcare professionals on the island. Then my recommendation is to raise the cap on the maximum cost that a property can have to about \$300,000 to allow this type of property to qualify for the homebuyer assistance programs that impact healthcare professionals, since currently the quality and location of the inventory of properties under \$200,000 are by no means attractive, and could even be considered unacceptable to a healthcare professional, such as a physician who just graduated. Thank you

Greetings Camilo Torres:

Thank you for your recommendation and participation in the public comment period of the draft of the Second Substantial Amendment to the CDBG-MIT Action Plan. According to the information you provide in your comment, PRDOH understands that you are referencing the Homebuyer Assistance Program (HBA) under the CDBG-DR Action Plan. The Homebuyer Assistance (HBA) Program is designed to help eligible homebuyers in the process of purchasing their first home.

PRDOH Response:

The Program provides grants for each eligible low-to-moderate income (LMI) or urgent need (UN) household whose members work as essential recovery personnel, which include health and medical emergencies professionals. Families in which a crucial recovery personnel member is eligible under the requirements set forth in the Program Guidelines are eligible to receive a grant of up to a maximum of \$55,000 to help them in the process of acquiring a home. The total grant amount shall be awarded according to the unmet need of each participant. For additional information about the Homebuyer Assistance Program and its eligibility requirements, you can consult the HBA Program Guidelines, available in English and Spanish on PRDOH web page at: <https://cdbg-dr.pr.gov/en/download/homebuyer-assistance-program-2/> (English) and

<https://cdbg-dr.pr.gov/download/programa-de-asistencia-directa-al-comprador-2/> (Spanish).

014	Comment ID:	03/14/23_WP_I_Osvaldo J Miranda Rivera(1)
Comment:		<p><i>I have been waiting for help to repair my house in Barrio Pozas in Ciales since the passage of hurricane Maria I am a disabled person and due to the emergency after the hurricane I left Puerto Rico and I am in Texas still waiting for help to repair my home in Puerto Rico all because I do not have an electric power or aqueducts receipt for my home I explained that I am a low income disabled person and that my home my house received water from my aunt's house that she shared with me until that moment when hurricane Maria passed. Everything is on hold or standby and they do not give me the much appreciated help I do not ask or want money only help in repairing my house through the assistance of the Federal government to leave from here from Texas to my home in Ciales P.R. the house is located at road 615 kilometer 4.9 Barrio Pozas at Ciales Puerto Rico my phone number is [REDACTED]</i></p> <p>Greetings Osvaldo Miranda Rivera:</p>

Thank you for your participation during the public comment period for the draft of the Second Substantial Amendment to the CDBG-MIT Action Plan. According to the information provided in this comment, PRDOH understands you may be referring to the Home Repair, Reconstruction, or Relocation Program (R3) under CDBG-DR funds. PRDOH will send your information to the R3 Program team to better understand your situation. If you applied to the R3 Program and would like to know the status of your case, please visit the following link: <https://cdbg-dr.pr.gov/r3/>. You can also request the status of your case and any other pending applications under other programs by sending an email to infoCDBG@vivienda.pr.gov, by calling 1-833-234-2324 or TTY 787-522-5950, or by mail: CDBG-DR/MIT Program Puerto Rico, P.O. Box 21365, San Juan, PR, 00928-1365.

PRDOH Response: If you did not apply to the R3 Program, PRDOH has published a form where citizens can enter their information in order to be notified of future opportunities and to request if additional funds are available. This form is available in English and Spanish at: <https://cdbg-dr.pr.gov/iframes/notifications.html>.

Moreover, in the CDBG-MIT Action Plan, PRDOH established the Single Family Housing Mitigation Program (SFM). The SFM Program focuses on prioritizing mitigation assistance for households with an immediate threat that are uninhabitable due to damage from recent disasters or dangerous events, or that are under immediate threat due to damage from recent events.

We encourage you to visit the CDBG-MIT web page for information on the application process, eligibility requirements, among other details available in the Program Guidelines: <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) or <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish).

015	Comment ID:	03/14/23_WP_I_Jessica Ortiz Ayala(1)
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Comment: *Good night, I don't know if these funds are real but if so they are very much appreciated.*

Greetings Jessica Ortiz Ayala:

PRDOH Response:

Federal Register Notice Vol. 85, No. 17 (January 27, 2020), 85 FR 4676, the U.S. Department of Housing and Urban Development (HUD) allocated a total of \$8.285 billion in Community Development Block Grant - Mitigation (CDBG-MIT) funds to the Government of Puerto Rico. CDBG-MIT funds represent a unique opportunity to implement strategies that will improve Puerto Rico's resilience against future disaster events. To stay updated on any news or information about CDBG-MIT funds, please visit PRDOH web page at <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) or <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish).

016	Comment ID:	03/15/23_WP_I_Jorge L vargas(1)
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Comment: *Help for [solar] panels*

Greetings Jorge Vargas:

PRDOH Response:

In the CDBG-MIT Action Plan, PRDOH established the Home Energy Resilience Improvements Program (CEWRI-HH) to provide assistance to families for the acquisition and installation of renewable solar energy equipment comprised of a photovoltaic system (PVS) and a battery storage system (BSS). The CEWRI-HH Program provides eligible applicants with a grant of up to 100% of the cost of the system or \$30,000, whichever is less.

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

017	Comment ID:	03/15/23_WP_I_Lucy Carrasco(1)
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Comment: Need housing Ensueño Project in Cupey 🙏

Greetings Lucy Carrasco:

PRDOH Response: PRDOH appreciates your support for the Ensueño project in Cupey, developed under the CDBG-DR Gap to Low Income Housing Tax Credits Program (LIHTC) under the CDBG-DR Program. The project will provide a decent and safe home for low- and moderate-income families. If you wish to learn more about this project and the LIHTC Program, visit PRDOH web page available in English and Spanish at <https://cdbg-dr.pr.gov/en/lihtc/> (English) and <https://cdbg-dr.pr.gov/lihtc/> (Spanish).

018	Comment ID:	03/15/23_WP_I_Zulma Rodriguez(1)
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Comment: *I need you to help me as my house was seriously affected by the earthquake and Hurricane Fiona, please I need your help as I am living in a borrowed house, thank you, God bless you!!*

Greetings Zulma Rodriguez:

PRDOH Response: Thank you for your comment. Currently, PRDOH has not received funding from the U.S. Department of Housing and Urban Development (HUD) for Hurricane Fiona recovery. However, through Federal Registration Notice Vol. 86, No. 3 (January 6, 2021), 86 FR 569, HUD allocated a total of \$36,424,000 in recovery funds to Puerto Rico for 2019-2020 earthquakes. Then, on February 3, 2022, HUD published Federal Registration Notice Vol. 87, No. 23 (February 3, 2022), 87 FR 6364, to allocate a total of \$184,626,000 in CDBG-DR funds to Puerto Rico for major disaster declarations DR-4773-PR (2019-2020 Earthquakes) and DR-4560-PR (Tropical Storm Isaias). As part of PRDOH responsibilities as manager of these recovery funds, Housing designed the Home Repair, Reconstruction, or Relocation Program (R3) under the Action Plan for 2019-2020 Earthquakes (DR- 4473-PR) and 2020 Tropical Storm Isaias (DR-4560-PR) Response. The purpose of this Program is to provide assistance for the repair or reconstruction of disaster-affected households, or relocation for households located in a high-risk area. For more details on the application process and general information on the R3 Program, visit PRDOH web page available in English and Spanish at <https://cdbg-dr.pr.gov/en/seismic-home-rehabilitation-and-reconstruction-action-plan/> (English) and <https://cdbg-dr.pr.gov/plan-de-accion-para-la-rehabilitacion-y-reconstruccion-de-hogares-por-sismos/> (Spanish).

Likewise, PRDOH is responsible for administering the Single Family Housing Mitigation Program (SFM) under the CDBG-MIT Action Plan. The SFM Program provides households located in high-risk areas, and/or with immediate threats due to damages from previous disasters, with the opportunity to receive repair, rehabilitation, or relocation assistance. For more information about the SFM Program, visit the CDBG-MIT web page where you will find the SFM Program Guidelines available in English and Spanish at: <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) or <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish).

019

Comment ID:

03/15/23_WP_PS_PIRAMID-ALL_Dario R. Martin(1)

CDBG-MIT Action Plan

Esteemed

Subject:INNOVATION - I offer the "House of the Future", self-supplied with renewable energy

Dear friends, after so many earthquakes, hurricanes, and natural disasters that have happened in many parts of the world, and with the new trend of using Renewable Energies, I saw the opportunity to contribute something to society.

After several months of working and waiting, I have already finished: developing, calculating, registering and patenting a House of the Future, which I called PIRAMID-ALL.-

Comment:

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

It also has a power charger for electric vehicles, soon to hit the market.

This house is ideal for: Refuges, Rural Hotel, Cabins, housing, self-sustainable rural urban developments , isolated areas or connected to the power grid, mountain range 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/>

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

<https://ecoinventos.com/casa-del-futuro-autosuficiente-asustarseid-todos/>

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

<http://inneuquen.info/nota-ancipal/piramid-all-es-la-casa-del-futuro-antisismico-eficaciate-y-autosustentable-con-energiarias-renovables-solar-aceiteque-lamosolar>

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

https://www.youtube.com/watch?time_continue=9&v=yJGnawB2IS8 (TV Channel 9 de Mendoza, Argentina)

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

This house is ideal for housing or tourism in rural or isolated areas where utilities are not available as it is self-sufficient with renewable energies, it also has great resistance to earthquakes and hurricanes.-

I have a registered and approved patent for this innovative project in several countries, such as: Argentina, Chile, México, Costa Rica y USA.-

Note: I intend to offer this patented innovative project to all of Puerto Rico If this project is of interest and you need more information, please do not hesitate to contact me.

Greetings

PIRAMID-ALL

C. Eng. - Darío R. Martin

La Pampa- Argentina

Mobile / WhatsApp: [REDACTED]

<https://www.piramidall.com>

Greetings Darío Rolando Martín and PIRAMID-ALL:

PRDOH Response:

Thank you for your participation during the public comment period for the Second Substantial Amendment to the CDBG-MIT Action Plan. PRDOH acknowledges the proposal you presented. It has been recorded and will be taken into account during the development of this amendment. CDBG-MIT funds represent a unique opportunity to implement strategies that will improve Puerto Rico's resilience against future disaster events. For more information on CDBG-MIT funds, please visit the following web page available in English and Spanish at <https://cdbg-dr.pr.gov/en/> (English) and <https://cdbg-dr.pr.gov/> (Spanish), respectively.

020

Comment ID:

03/15/23_WP_GE_Municipio Autónomo de Guaynabo_Plan. Ada E. Bones Berrios(1)

The Municipality of Guaynabo has been conceptualizing several project 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 include. Due to an involuntary error, the name Sierra Berdecía Urbanization, which is part of the project area to be worked, what 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 de Guaynabo and Sierra Berdecía community area. Due to the level difference between the house 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 Sierra Berdecía, Colinas de Guaynabo and surrounding communities.

Descriptions of Location:

Sierra Berdecía, Colinas de Guaynabo, Riveras de Honduras, Terrazas de Guaynabo, Colimar and Villa Providencia Eldarly Home Areas
Greetings Ada E. Bones-Berrios and Guaynabo Municipality:

PRDOH appreciates your participation and acknowledges receipt of your comment issued during the public comment period for the draft of the Second Substantial Amendment to the CDBG-MIT Action Plan. As part of the preparation for submitting the initial CDBG-MIT Action Plan, PRDOH collected information from different proposed mitigation projects, including MAG-002. However, we want to note that the projects listed in Appendix D serve only as an example of a potential project that could be implemented under the CDBG-MIT programs.

PRDOH Response:

Nevertheless, PRDOH is responsible for administering the Multi-Sector Community Mitigation Program (MSC) under the CDBG-MIT Action Plan. The MSC Program provides socially vulnerable communities (or community sectors) that are experiencing socioeconomic and environmental disadvantages with the opportunity to relocate away from high-risk areas. This includes areas prone to landslides, severe floods, liquefaction, among other hazards.

To learn about the application process for financing for the proposed project, we encourage the Municipality of Guaynabo to visit PRDOH web page where they will find the Program Guidelines available in English and

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

021	Comment ID:	03/15/23_WP_GE_Carmen_Carmen González Díaz(1)
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Comment: *I was left on the streets since Nov. i've requested and nothing SEC 8 Caguas left me adrift they did not guide me and are not organized I am incapacitated and alone I appreciate whatever you can do to help me thank you, i've never been homeless or a beggar and I am an incapacitated professional [REDACTED]*

Greetings Carmen González Díaz:

PRDOH Response: The Puerto Rico Department of Housing appreciates your comment and regrets your situation. Currently, PRDOH is responsible for administering the Single Family Housing Mitigation Program (SFM) under the CDBG-MIT Action Plan. The SFM Program focuses on prioritizing mitigation assistance for households with an immediate threat that are uninhabitable due to damage from recent disasters or dangerous events, or that are under immediate threat due to damage from recent events. We encourage you to visit the CDBG-MIT web page to access the SFM Program Guidelines available in English and Spanish: <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) or <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish). Similarly, we recommend contacting the Caguas Municipality Public Housing Authority by phone at (787) 653-8833 x1525, or by email at lserrano@caguas.gov.pr.

022	Comment ID:	03/15/23_WP_I_Norberto Lasanta(1)
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Comment: *My case [REDACTED] was approved in April of last year under the energy resilience program this is solar panels and water tank my house was inspected several times and nothing has happened yet, there is only one person in the call center I spoke with him on Monday and call failed today I could finally communicate again and he indicates that I am still on an administrative hold; this is fine but so very slow .*

Greetings Norberto Lasanta:

PRDOH Response: Thank you for your participation during the public comment period for the draft of the Second Substantial Amendment to the CDBG-MIT Action Plan. According to the information provided in this comment, PRDOH understands that it refers to the Community Energy and Water Resilience Installations (CEWRI) Program under CDBG-DR funding. The CEWRI Program is designed to provide photovoltaic energy systems and water storage system to a portion of the Home Repair, Reconstruction, or Relocation (R3) Program participants. Your case was referred to the CEWRI Program to make sure they provide the current status of your application.

For more information about the CEWRI Program, visit PRDOH web page available in English and Spanish at <https://cdbg-dr.pr.gov/en/community-energy-and-water-resilience-installations-program/> (English) and <https://cdbg-dr.pr.gov/programa-instalaciones-comunitarias-para-la-resiliencia-energetica-y-de-abastecimiento-de-agua/> (Spanish), respectively.

023	Comment ID:	03/15/23_WP_I_Myrta Caraballo Quiara(1)
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Comment: *Many amendments and very little action. Federal funds have been wasted. I am an example of that. My case is no. [REDACTED] and they made me invest in the rent of the house for 3 months, storage rent for 3 months, and a moving contract and to top it off the company Yates-Bird appropriated those federal funds, and didn't want to pay me. It is just unbelievable that we hand in funds to private hands and they waste the money. So far neither Mr. William Rodriguez nor the director of the Cor3*
Greetings Myrta Caraballo Quiara:

PRDOH Response: PRDOH appreciates your comment. The Home Repair, Reconstruction, or Relocation Program (R3) is committed to providing applicants the opportunity to relocate to a new safe and decent home. In accordance with the Program Guidelines, PRDOH has chosen to implement optional relocation policies for the R3 Program under which property owners may qualify for optional relocation assistance (ORA) during Program-subsidized activities. Also, if an eligible R3 Program applicant must temporarily vacate the hurricane-affected property to allow for program-sponsored activities and the applicant is unable to secure temporary housing, the applicant may qualify for rental, moving, or storage assistance to facilitate temporary relocation until program activities are completed.

To ensure that your case is addressed, your comment was sent to the R3 Program team. In addition, if you would like to know the status of your application, please visit the following web page: <https://cdbg-dr.pr.gov/iframes/intakestatus>. For more information on the R3 Program, visit PRDOH CDBG-DR web page available in English and Spanish at <https://cdbg-dr.pr.gov/en/r3/> (English) and <https://cdbg-dr.pr.gov/r3/> (Spanish).

024	Comment ID:	03/17/23_WP_I_Coral Mabry Olivieri(1)
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Comment: *Dear Sirs,*
I hereby wish to submit my comments to include the community of Urbanización Sierra Berdecía in Guaynabo in project number MAG-002MIT. The proposed project includes the communities of Colinas de Guaynabo, Riveras de Honduras, Terrazas de Guaynabo, Colimar, and Villa Providencia Elderly Home as the communities affected by the landslides and erosion in the Guaynabo River, for which this stabilization project is proposed. However, the community of Urbanización Sierra

Berdecía is not included on this list even though in our community two homes have already been lost and the remaining people who have homes that along the river are at serious risk.

The communities most affected by the situation of the Guaynabo River are Urbanización Sierra Berdecía and Urbanización Colinas de Guaynabo. The other communities mentioned in the draft have not reported damage or loss of homes. My mother, a retired school principal, lost her home on Calle Febles H-24 in Urbanización Sierra Berdecía. Our community is one street away from the community of Colinas de Guaynabo and separated by the riverbed from the community of Colimar.

In our community, the properties on the border the Guaynabo River, including mine (Febles H-23) which is located right next to the property my mother lost (Febles H-24) are at imminent risk.

Our community has 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 made the corresponding arrangements to submit its comments to this draft making the claim of inclusion of Urbanización Sierra Berdecía.

We in the Sierra Berdecía Urbanization community request that we be taken into account, included in the proposed projects, and thus be able to see some solution to our situation.

Greetings Coral Mabry Olivieri:

The Puerto Rico Department of Housing appreciates your participation during the public comment period for the second substantial amendment to the CDBG-MIT Action Plan. In Appendix D, PRDOH presented a list of potential projects that could be implemented under the CDBG-MIT programs, including the MAG-002 project you are referring to. These projects only served as an example to develop the initial CDBG-MIT Action Plan.

PRDOH Response: Nevertheless, in the CDBG-MIT Action Plan, PRDOH designed the Multi-Sector Community Mitigation Program (MSC). The MSC Program provides socially vulnerable communities (or community sectors) that are experiencing socioeconomic and environmental disadvantages with the opportunity to relocate away from high-risk areas. This includes areas prone to landslides, severe floods, liquefaction, among other hazards. For more information about the MSC Program, please visit PRDOH web page for Program Guidelines available in English and Spanish: <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) or <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish), respectively.

025	Comment ID: 03/17/23_WP_PS_Montblanc PR Associates, L.P._Franklin Hess(1)
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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 Second 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.

Regards, Franklin Hess and Monblanc PR Associates, L.P.:

PRDOH Response:

PRDOH acknowledges receipt of your remarks during the public comment period for the Second Substantial Amendment to the CDBG-MIT Action Plan. According to the information submitted in your proposal, PRDOH believes you could benefit from the Multi-Sector Community Mitigation Program (MSC). The MSC Program provides socially vulnerable communities (or community sectors) that are experiencing socioeconomic and environmental disadvantages with the opportunity to relocate away from high-risk areas while keeping their communities together. To learn more about the MSC Program, visit PRDOH web page, available in English (<https://cdbg-dr.pr.gov/en/cdbg-mit/>) and Spanish (<https://cdbg-dr.pr.gov/cdbg-mit/>).

026	Comment ID: 03/17/23_E_I_Gloria Santanas(1)
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Comment:

*It is a magnificent work opportunity for every individual and family, since it is the economic livelihood and provides higher expectations of quality of life through adequate housing, and it even combats poverty in every place, humanity, in addition to improving modern and technological agriculture, which is just and extremely necessary and important for every nation. * IF WE DO NOT PLANT AND GROW OUR OWN FOOD, THERE WILL BE NO FOOD SECURITY IN ANY NATION* THANK YOU, THANK YOU, THANK YOU for the government's essential support, no matter where we are in this world.*

Regards, Gloria Santanas:

PRDOH Response:

PRDOH's team appreciates your support for the housing programs designed with CDBG-MIT funds. PRDOH is committed to providing decent and safe housing to the families that need it most on our Island. We also appreciate your support for the efforts made in the agricultural sector through the Re-Grow PR Urban-Rural Agriculture Program under the CDBG-DR Action Plan. These grants have different purposes: while CDBG-DR funds focus on disaster recovery, CDBG-MIT provides funds to support activities that build resilience and reduce or eliminate the long-term risk of loss of life in the event of future disasters. To stay updated on any news or information about CDBG-MIT funds, please visit PRDOH web page at <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English), or at <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish). To learn more about CDBG-DR funds and their respective programs, please visit our web page, available in English (<https://cdbg-dr.pr.gov/en/>) and Spanish (<https://cdbg-dr.pr.gov/>).

027	Comment ID:	03/17/23_E_I_Lucy Perez(1)
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Comment:

You should offer help to adults who struggle every month to avoid losing a mortgage that doesn't owe much but is difficult to pay due to not having a high income.

Regards, Lucy Perez:

PRDOH Response:

Thank you for sending us your suggestion. Currently, none of the programs established under the CDBG-MIT Action Plan offer mortgage financing assistance. CDBG-MIT funds represent a unique opportunity to implement strategies that will improve Puerto Rico's resilience against future disaster events. PRDOH has three (3) programs in the CDBG-MIT Action Plan that are dedicated to reinforcing the housing sector: the Single Family Housing Mitigation Program, the Social Interest Housing Mitigation Program, and the Multi-Sector Community Mitigation Program. To learn more about the assistance available to households, visit PRDOH web page at <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) and <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish).

028	Comment ID: 03/17/23_E_Brenda Olmedo Rivera(1)
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Comment: *Hello, this is a good program, but the excellent credit factor sometimes hurts the middle class, who we live paycheck to paycheck.*

Regards, Brenda Olmedo Rivera:

PRDOH Response: Thank you for your participation during the public comment period for the draft Second Substantial Amendment to the CDBG-MIT Action Plan. PRDOH is currently responsible for managing the Community Energy and Water Resilience Installations-Household (CEWRI-HH) Program, which aims to provide assistance to Puerto Rican families for the purchase and installation of renewable solar energy equipment, consisting of a photovoltaic system (PVS) and a battery storage system (BSS). The CEWRI-HH Program comprises two subprograms: the Home Energy Resilience Improvements Subprogram and the Incentive Program.

PRDOH modified the eligibility criteria in the Incentive subprogram in order to provide assistance to households with up to 200% of the Area Median Family Income (AMFI) established by the U.S. Department of Housing and Urban Development (HUD). With this change, PRDOH will be able to provide renewable energy systems to more Puerto Rican households with urgent mitigation needs. If you would like to know the eligibility requirements for the CEWRI-HH Program, please visit PRDOH web page to access the Program Guidelines, available in English (<https://cdbg-dr.pr.gov/en/home-energy-resilience-improvements-program/>) and Spanish (<https://cdbg-dr.pr.gov/energy-resilience-improvements-at-home/>).

029	Comment ID: 03/19/23_WP_NGO_Hispanic Federation_Maritere Padilla Rodríguez(1)
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Re: Remarks from the Hispanic Federation regarding the Second Substantial Amendment to the CDBG-MIT Fund Mitigation Plan

Dear Secretary Rodríguez Rodríguez:

Comment: *On February 17, 2023, the Puerto Rico Department of Housing (PRDOH) released the Second Substantial Amendment to the Puerto Rico Mitigation Action Plan (CDBG-MIT Action Plan) for public comment. The deadline for comments is March 19, 2023, so in due course, the Hispanic Federation is submitting its comments with a primary focus on an assessment of the programs, as proposed. We are also following up on some of the remarks submitted in September of 2022, during the comment period for the first substantial amendment to the plan.*

The Hispanic Federation is a nonprofit organization founded in 1990 in the state of New York, U.S., with the objective of supporting and empowering Hispanic communities and institutions through initiatives in the areas of education, health care, immigration, civic engagement, economic development, and the environment, among others. For years, the organization has advocated for the rights of Puerto Ricans and other Hispanic communities at the federal, state, and local levels. Currently, the organization has offices in five states and in Washington, D.C., and after the impact of Hurricane María, it established permanent operations in Puerto Rico.

So far, the Hispanic Federation has committed over \$50 million to more than 130 subsidized nonprofit groups around Puerto Rico. The initiatives focus on recovery, housing, agriculture, mental health, and energy, among others. This is why it promotes a holistic public policy where the mitigation efforts in these areas will be effective. The Hispanic Federation is committed to upholding the basic principles of justice, transparency, real citizen engagement, sustainability, and the protection of fundamental rights.

GENERAL RECOMMENDATIONS FOR THE CDBG-MIT ACTION PLAN

A. Citizen Engagement

We reiterate our appreciation for the efforts made by the Department of Housing in seeking to extend engagement processes. We are pleased to acknowledge the work done by the Department of Housing to increase engagement in the implementation of the Action Plan. However, it is important to emphasize that there are sectors of the population that still need additional attention and support, especially those who were disproportionately affected and still face challenges in accessing adequate housing solutions. Therefore, it would be beneficial for the Department of Housing to consider including these communities more actively and effectively in the process of implementing the Action Plan, thus achieving a just and equitable solution for all citizens.

B. Public Hearings

The public hearings conducted have not been sufficient to adequately gather the public's feedback. We recommend additional public hearings on the plan and program guidelines being developed. We also recommend developing and implementing an educational campaign to inform the community about the status of processes, the plan's contents, compliance requirements, and your programs, as well as the importance of their participation in public hearings. This will help ensure that the hearings are effective and that the opinions and perspectives of those affected can be gathered in a fair and equitable manner.

C. Citizen Advisory Committee

The new 6th version of the Citizen Participation Plan is described as follows:

“Update to incorporate the municipalities declared as most impacted and distressed areas by Federal Register Notices 86 F.R. 569 and 87 F.R. 6364 (earthquakes and Tropical Storm Isaiás), and update to the requirements and applicability of the Citizen Advisory Committee. The changes are marked in gray.”

See page 15 of version 6 of the CDBG-DR Citizen Participation Plan of November 10, 2021.

This change identified as an “update to the applicability requirements of the Citizen Advisory Committee” is meant to remove this committee’s authority —and with it, the strongest engagement driver— in the allocation for the CDBG-DR Fund Action Plan. Similarly, deleting the text referring to unmet needs decouples these efforts from addressing the data —which represents the best available information—on the people who suffered these losses or damages.

It is unacceptable that the Department of Housing is spending time and resources altering its policies to restrict access to real participation in the decision-making process under the CDBG-DR Action Plan. This limits transparency and prevents the public from contributing significantly to the post-disaster recovery and reconstruction process.

The lack of citizen engagement can lead to decisions that do not reflect the needs of our communities and therefore do not contribute to an effective and sustainable recovery. An example of this has been the policies on ownership that the department has progressively relaxed thanks to the advocacy efforts of local nonprofit organizations. It is therefore essential to promote a meaningful citizen engagement in the process of implementing the CDBG-DR Action Plan and to provide opportunities for all voices to be heard. Once again, the Hispanic Federation asks the Department of Housing to extend and restore the CAC’s authority over all action plans that handle CDBG-DR funds to ensure a fair and transparent decision-making process.

In addition, we request the following:

- Publish an email address or other means of contacting the Citizen Advisory Committee on your web page, especially plenary members and how to contact them officially.*
- Establish a clear and responsive process for requesting meetings and forums with the CAC.*
- Publish compliance details with the “Allocation Notice” requirements and the CAC operations guidelines.*

D. Transparency

On February 21, 2023, the Hispanic Federation submitted comments for two HUD “Requests for Information” titled: “Request for Information Community Development Grant Disaster Recovery (CDBG-DR) Formula (Docket No. FR-6337-N-01)” and “CDBG-DR Rules, Waivers, and Alternative Requirements (Docket No. FR-6336-N-01)”, respectively. Specifically, HUD requested recommendations on how to improve the

process and language used in developing future “Allocation Notices” for presidentially declared disaster areas.

The issue of transparency was a key topic in both submissions. Much of the recommendations focus on how the lack of data to effectively define the most impacted and distressed areas and populations, as well as unmet needs, jeopardizes the effective use and equitable distribution of funds. We also submitted recommendations to improve the design and implementation of essential tools, such as transparency portals, dashboards, and the web page. HUD's compliance requirements include publishing a justification of measures and costs in light of the plan objectives. Currently, these tools do not yet provide information on the core issues of the recovery process.

Some of the key questions that these tools should be able to answer simply are: How were decisions made or allocated? Who participated in those decisions? How have the funds been distributed? Which geographical and non-geographical communities have been reached by these funds? Where are addressed and unaddressed damages centered? Where are unmet needs centered? Where are the denied cases centered? How do these behave given variables such as location, income and social class, unmet needs, and denied cases? Among many others.

E. Technical Assistance

The Hispanic Federation reiterates the importance and relevance of these comments. We understand that the programs focused on developing and installing risk management infrastructure that will protect communities in future events require the agency's full support for their execution, and technical assistance is a key part of this. This involves critically identifying and setting aside resources for projects and initiatives included in the Community Resilience Plans being developed under the Whole Community Resilience Planning Program in the CDBG-DR Fund Action Plan.

F. Responsible Analysis to Identify the Most Impacted Areas and Populations

The Hispanic Federation reiterates the importance and relevance of these comments. This was also a central topic in the comments submitted through the two “Request for Information” published by HUD. We explicitly recommend that the definition for ‘most impacted and distressed areas and populations’ should place more value on concrete and official information, such as social vulnerability indices, location, unmet needs, and inspected damages.

G. Any Project Funded Under This Action Plan Must Mitigate a Risk and Benefit Community Development

We agree with the requirement that projects funded with this grant should “lead to measurable and verifiable reductions in the risk of loss of life and property due to future disasters, and yield benefits for community

development.” We also consider it highly advisable that the Department of Housing refrain from promoting the objective of eliminating “arrabales” (slums) in the context of mitigation activities.

However, Exhibit D shows that several agencies submitted projects that do not clearly state the risk they would mitigate. For example, some projects preliminary submitted by Public-Private Partnerships (PPPs) lack any leverage funds and have no clear association to risk mitigation or reduction efforts. We recommend that the projects submitted by PPPs be subject to the same scrutiny as all other projects, without any prioritization or preferential treatment.

These funds should not be seen as an equity investment fund for projects that do not seek to mitigate risk. For example, the strategy called “Convergencia con Inversiones de Capital” (“Convergence with Equity Investments”) increases the possibility of financing projects that may hardly involve any risk management. The fact that a project has been included in a list of capital improvement projects does not mean that it is a priority for building resilience in the country. For this reason, we recommend that any proposed project under this plan be subject to the same scrutiny to ensure that they will provide measurable and verifiable reductions in risk from future disasters and yield benefits for community development.

H. Seventy-five Percent (75%) of Funds Should Benefit the Low- and Moderate-Income (LMI) Population

The Hispanic Federation reiterates the importance and relevance of these comments. There are programs that we recommend to amend and even eliminate if they do not adjust and offer methods that have an impact on the populations that these funds are intended to assist. We recommend the development of a document to be used as a protocol by the evaluation committees and officials in charge of awarding and approving projects, initiatives, and contracts, in order to demonstrate compliance with the national objective of investing funds to benefit low- and moderate-income populations. We recognize and appreciate the inclusion of the UNM national objective in the Multi-Sector Community Mitigation Program, among others.

I. Any Entity or Institution Contracted by the Department of Housing to Administer a Program Under This Plan Must Be Selected Through Competitive Processes

As proposed, the CDBG-MIT Action Plan contemplates the alternative of contracting external entities or institutions to administer programs. For example, the Mitigation and Adaptation Policy Support Program states that PRDOH will designate an entity as lead partner to manage program activities on behalf of Puerto Rico for the benefit of all citizens. Another example is the Planning and Capacity Building Program. This is why the Hispanic Federation recommends that any entity or institution contracted to administer programs be selected through public competitive processes. This will ensure transparency in establishing the scope of

delegated authority and the allocated funds to be administrated. Similarly, robust metrics must be established to demonstrate compliance with their responsibilities.

J. Public Policy on Non-Discrimination

The Department of Housing should implement a comprehensive public policy of zero tolerance for any form of discrimination based on race, color, sex, national origin, social origin or status, political or religious beliefs, disability, family composition, sexual orientation, gender identity, and even beyond traditionally protected classes. Specifically, no agency, organization and/or institution that receives and manages public funds for mitigation may be allowed to discriminate in any way against an individual.

RECOMMENDATIONS FOR SPECIFIC SECTIONS AND PROGRAMS OF THE CDBG-MIT ACTION PLAN

A. Secondary Sectors of Vital Needs for Food, Water, and Shelter

The Hispanic Federation reiterates the importance and relevance of these comments. Puerto Rico's food system is highly dependent on the outside world since it imports about 82% of what it consumes. The Jones Act imposes shipping restrictions by establishing that all goods shipped to Puerto Rico must be transported by U.S. vessels. About 88% of imports leave the port of Jacksonville, Florida, which entails high transportation costs and a journey of 2,800 miles from the point of origin to family tables in Puerto Rico, making foods and other goods 151% more expensive. In turn, the vulnerability caused by a combination of no access to economic resources and poor access to critical services has increased food insecurity in Puerto Rico. The Arecibo region has the highest percentage of food insecurity in the island, at 40.6%. The situation becomes even more untenable with the reduction of 20% of the benefits received by participants of the Nutrition Assistance Program (NAP), which diminishes the economic capacity of families under the poverty threshold to access their basic food basket. This, within a context of economic inflation that places Puerto Rico in the 14th position in terms of price increases for grocery items, compared to 297 other jurisdictions, according to the Cost of Living Index prepared by the Puerto Rico Statistics Institute.

Similarly, climate change has a significant impact on agriculture and food security. The report from the Puerto Rico Climate Change Council titled "Puerto Rico's State of the Climate: Assessing Puerto Rico's Social-Ecological Vulnerabilities in a Changing Climate" (2011) identifies significant changes in climate patterns. Some of the patterns identified include accelerated processes of coastal erosion, drastic increases in sea levels, the proliferation of more frequent and violent hurricane seasons and atmospheric phenomena, frequent and prolonged drought seasons, sudden changes between periods of rain and drought, shift of precipitation patterns from the mountains to the coast, loss of biodiversity and microorganisms that are beneficial for sustainability, and the

persistence of extended heat waves. These patterns destabilize the viability of agricultural development and food sustainability in Puerto Rico.

In September of 2022, after the impact of Hurricane Fiona, the Hispanic Federation convened and coordinated meetings with various entities linked to the agri-food sector in Puerto Rico. The highest priority needs identified by the sector were lack of access to economic support, crop failures due to power outages, infrastructure rehabilitation, skilled workmanship with knowledge on the sustainable post-emergency management of agroforestry resources, and backup brigades for cleaning up affected farms. For this reason, some of the mitigation programs that could be considered to address these and other needs include:

- Program to ensure access to cooling systems
- Programs supporting the creation or expansion of existing projects to access adequate agricultural technology
- Program to facilitate sustainable access to water resources for agricultural activities

B. Benefit-Cost Analysis for Covered Projects

We recognize and appreciate the Department's reengineering of the evaluation process for Covered Projects. We believe that this is a much more comprehensive process leading to better decisions. However, we understand that there is a need to elaborate on the processes for decision-making, transparency, and representation of the public interest, to provide clarity in the evaluation and awarding processes related to these projects, which represent a large investment of public funds that need to be monitored from start to finish to promote their responsible use.

C. Infrastructure Mitigation Program

We acknowledge and appreciate the amendments made in light of this matter, especially providing more use and greater visibility to the developed mechanisms, as is the strengthening of lifelines or redundancy for critical and essential facilities. The incorporation of such elements will definitely improve the project selection process in a competitive environment. However, these measures are no substitute for governance, representativeness, and public participation. We insist that the process of allocating funds at this level of public investment must have representatives of public interest that the people trust overwhelmingly if the process is to gain the broad support it should have.

D. Economic Development Investment Portfolio for Growth Program

The Hispanic Federation reiterates the importance and relevance of these comments. While we understand the reason for adding language to prioritize projects that have private and external funding, it is cause for concern that such accommodations represent a degree of leeway departing from the criteria established in the mechanisms developed to support this decision-making process and the general public interest. To this end, as in other programs where the level of public investment is

equally high, we recommend participation and transparency through the willingness to include representatives of public interest as part of the evaluation committee.

E. Community Energy and Water Resilience Installations Program

The Hispanic Federation makes the following recommendations regarding the Fund for Home Energy and Water Resilience Improvements:

1. The following priorities should be restored for household selection: Elderly residents, age of sixty-five (65) years or older
2. Critical recovery personnel
3. Residents whose energy and water security are at high risk
4. A reasonable time frame should be established so that only priority groups can apply to these programs.
5. Priority should be given to installing rooftop solar systems with batteries, and, only if this is not a viable option (for example, in high-rise buildings where the installation would compromise the property infrastructure), portable solar generator technologies (such as Goal Zero) when appropriate.
6. The equipment must be approved by the Permits Management Office, and the installations must meet the standards of the National Electrical Code, 2017, or whichever code is in force at the time of installation.
7. Hybrid systems should be used with the ability to interact with the power grid.
8. The program should pre-establish systems' generation and storage capabilities and set the minimum capabilities that the industry must meet.
9. There should be a reasonable number of pre-qualified solar power companies around Puerto Rico. A notice should be issued for their qualification, and the criteria should include, among others: being certified to perform solar installations in Puerto Rico, owning a company registered in Puerto Rico, and complying with the installer regulations of the Public Energy Policy Program, the Energy Bureau, and the Puerto Rico Department of Consumer Affairs.
10. To be eligible, applicants to the Program must have a proprietary interest over a single-family home structure where someone is residing full time, be it the owner or a renter. The family must earn eighty percent (80%) or less of the AMFI.
11. The water reserve facilities should be reestablished.
12. A process should be implemented so that the solar power companies that are unable to install water reserves may subcontract a company specialized in this type of installation

Regarding the Fund for Community Installations, we make the following observations, comments, and suggestions:

1. The following priorities for selection, which had been included in this program, should be reinstated:
 - a. Communities where 51% or more of its members are low- and moderate-income families
 - b. Communities whose energy and water security are at high risk

With regard to the Incentive Fund, we make the following observations, comments, and suggestions:

- A. The incentive for small businesses to install solar systems with batteries should be reinstated, under the following conditions:
 - a. The business must address at least one of the lifelines established by the Department of Housing.
 - b. The business must be located in an area where at least 51% of the population is low-income.
 - c. There must be a matching of funds of at least 20%.
 - d. The cap on this incentive per business should be \$25,000.
 - e. We recommend creating a subcommittee within the CAC (Citizen Advisory Committee) to evaluate these applications.

F. Risk and Asset Data Collection Program

The Hispanic Federation reiterates the importance and relevance of these comments. We recognize the progress made by this program, in terms of concept and content, with this amendment. It seems to be headed in the right direction.

G. Mitigation and Adaptation Policy Support Program:

The program should establish criteria for selecting a managing partner that is trusted by the communities living in at-risk areas and is committed to ensuring at all costs that the program is not used to encourage the mass displacement of communities. The partner should be trained and acquainted with the process through which municipalities have developed their Municipal Recovery Plans and Mitigation Plans to achieve a comprehensive and uniform incorporation of recommendations. It is important to establish that the third sector, or nonprofit organizations—in their diversity,— can be program subrecipients.

This program will use the information gathered through the planning programs under the CDBG-DR Action Plan, such as GeoFrame, the Whole Community Resilience Planning Program, and the Municipal Recovery Planning Program. This is why the CAC's jurisdiction should include both CDBG-MIT and CDBG-DR programs.

H. *Planning and Capacity Building Program:*

The Hispanic Federation reiterates the importance and relevance of these comments. We recognize and appreciate the inclusion of additional language to make it easier to understand many of the concepts involved in an evaluation and award process.

I. *Reserve for Matching Risk Mitigation Grants:*

This Program would be developed jointly and in alignment with the Grant Match Program included in the CDBG-DR Fund Action Plan. In view of this situation, we reiterate how important it is for the CAC jurisdiction to include both the CDBG-MIT and the CDBG-DR programs.

Considering the capabilities and activities allowed in the Program —such as property acquisition, relocation, payment of administrative costs, and assistance for the economic development of for-profit enterprises, among others,— it is vital that the level of transparency in the design and implementation of this program be absolute. A detailed outline of how these decision-making processes will be carried out when selecting projects must be provided —especially for the health care reserve, which has been entirely set aside for the private sector and will be determined mostly via direct selection.

J. *Single Family Housing Mitigation Program:*

We consider it necessary to provide a detailed description of the decision-making process in discretionary situations, such as extensions, the definition of floodways, access to housing counseling, and high-risk areas, among others. We recommend evaluating the enforcement of standards and certifications for green buildings, on a case-by-case basis. It is beneficial that the program allows referrals to the Multi-Sector Community Mitigation Program as an alternative to avoid displacement.

K. *Multi-Sector Community Mitigation Program:*

We thank the Department of Housing for adopting this Program, which provides mitigation alternatives at the community level and prevents displacement. This Program should have more funding, considering key factors such as:

- The number of individual assistance cases denied due to issues mostly related to ownership and title matters.*
- The estimate of more than 240,000 structures located within areas designated as flood zones.*
- The number of communities lacking critical infrastructure to manage risks such as floods, landslides, and others.*
- In terms of a benefit-cost analysis, the way the construction and development of infrastructure such as gutters and drains has a superior mitigating effect, with direct effects on life and property protection, at a lower cost than large-scale projects.*

- It is important to note that the programs under the CDBG-DR Action Plan do not offer affordable housing options in urban areas, as it has been recommended through the rehabilitation of the large inventory of vacant, disused, and abandoned properties, which exceeds 100,000 housing units in the 5 major urban centers: San Juan, Bayamón, Carolina, Mayagüez, and Ponce. In the absence of options for these populations, mitigation projects should contribute to the permanence of existing communities in decent and safe conditions.
- The Maximum Award of \$100,000,000 will make the Program attractive to mega-projects that would move away from community-level constructions, which has always been the spirit of the recommendations submitted. Similarly, this opens the door for the program funds to be consumed in just a few projects.
- We recommend that the development of the guidelines and the implementation stage of this program be subject to extensive citizen engagement, including, but not limited to, the members of the Citizen Advisory Committee.
- We recommend that community-level mitigation alternatives be evaluated by each community concerned, as each one has a unique composition of stakeholders, including residents, businesses, nonprofit organizations, municipalities, etc. Communities should know their mitigation alternatives before having to relocate in order to keep the mechanisms provided in terms of permitted activities —such as property acquisition, relocation, payment of administrative costs, and assistance for the economic development of for-profit enterprises, among others— from being carried out with inadequate measures for transparency and accountability.
- We are concerned that the program narrative mentions the possibility of intervening in 59 public or multifamily housing projects. This suggests that projects have been shortlisted, at the cost of ignoring those in communities that have not been able to submit them in previous processes.
- Although mention is made of the intention to address the situations of communities that currently do not qualify for coverage under the National Flood Insurance, the funds allocated suggest that these projects will not be prioritized.
- Criteria needs to be included to promote employment by contracting Community Development Corporation (CDCs).
- It is extremely beneficial that the amount of \$52 million has been set aside for Caño Martín Peña to help in the development of housing.

Warm regards,

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Dear members of the Hispanic Federation:

We appreciate your continued commitment and support for the implementation of the CDBG-MIT Programs. We acknowledge your comments on the Second Substantial Amendment to the CDBG-MIT Action Plan.

PRDOH Response:

Citizen engagement is extremely important for the PRDOH team to understand the needs of the most vulnerable communities in our Island. Input from citizens and interest groups, such as non-governmental organizations, nonprofit entities, public and private agencies, among others, is an essential part of the development of CDBG-MIT programs. For this reason, CDBG-MIT Programs such as the Infrastructure Mitigation Program and the Economic Development Investment Portfolio for Growth Program recommend applicants to provide evidence of community support for projects that will be impacting these families. All this in order to understand the situation and the mitigation needs to provide the best solution that benefits the entire community. Likewise, PRDOH agrees with the Hispanic Federation on the need to implement educational campaigns on CDBG-MIT Programs, therefore we have established different outreach efforts to keep citizens informed about programs that could help them reduce the risk of loss of life in case of future disasters. One of the most recent outreach efforts was made for the launch of the Home Energy Resilience Improvement Program (CEWRI-HH), where PRDOH conducted a demographic analysis to identify the communication channels used by the public that could benefit from the program and share information about the application process and program benefits through the appropriate channels. Similarly, PRDOH, alongside the Citizen Advisory Committee (CAC), will make sure to reach out to the communities that will be affected or could benefit from the services offered by each of the CDBG-MIT programs to provide mitigation and resilience solutions in case of future disasters.

In regards to your comments on the CAC, PRDOH recognizes the value added by each CAC member, as they offer essential recommendations for the development and implementation of CDBG-MIT programs and promote transparency and citizen engagement. According to Federal Register Vol. 84, No. 169 (August 30, 2019), 84 F.R. 45838, the U.S.

Department of Housing and Urban Development (HUD) requires each recipient of CDBG-MIT funds, in this case PRDOH, to establish a committee to *“provide increased transparency in the implementation of CDBG–MIT funds, to solicit and respond to public comment and input regarding the grantee’s mitigation activities and to serve as an on-going public forum to continuously inform the grantee’s CDBG–MIT projects and programs.”* Based on this federal requirement, PRDOH established the CAC and developed the Citizen Advisory Committee Operational Guidelines to describe the CAC’s structure and responsibilities in accordance with 84 F.R. 45838. Regarding the CAC’s participation in matters relevant to CDBG-DR funds, PRDOH provides various public forums, such as the period of thirty (30) days for public comments for each substantial amendment, where citizens and interest groups can offer their opinions and recommendations for the implementation of these programs.

The CDBG-MIT Action Plan includes Annex H – Projects of the Governor’s Office, and Annex D – Proposed Mitigation Projects, both of which include a description of potential mitigation projects. Keep in mind these projects, like any other project directly selected by PRDOH and/or submitted through a competitive process, must meet both federal and local requirements to ensure proper compliance and provide an opportunity for vulnerable and distressed communities to receive resilient solutions for risk mitigation and the reduction of loss of life. PRDOH wishes to note that the list of projects included in Annex D was compiled to serve as an example of possible mitigation projects for the initial CDBG-MIT Action Plan. These projects could be implemented under the CDBG-MIT programs, provided they comply with the application process and the evaluation criteria established in accordance with the Program Guidelines.

In terms of the increase to the benefit percentage for the low- to moderate-income (LMI) population, in Federal Register Notice 84 F.R. 45838, HUD stated that PRDOH must use fifty percent (50%) of the CDBG-MIT funds to benefit low- to moderate-income individuals. However, we would like to point out that PRDOH is committed to serving LMI communities, which means that projects demonstrating a greater benefit for these communities will be prioritized. We would also like to note that PRDOH has a Fair Housing and Equal Opportunity Policy for the CDBG-DR/MIT programs, which describes the requirements and protocols aimed at ensuring all CDBG-DR/MIT programs promote fair housing and equal opportunities for all who participate in and benefit from these programs, both for the beneficiaries and for the employees who support these programs. As administrator of CDBG-MIT funds, PRDOH is responsible for complying with this policy to prevent discrimination against any individual who participates or wishes to participate in CDBG-MIT programs. This policy applies to both PRDOH’s staff, the subrecipients and contractors that help PRDOH manage the CDBG-MIT funds. To learn more about the Fair Housing and Equal Opportunity Policy for CDBG-DR/MIT Programs, visit the PRDOH web page, available in English (<https://cdbg-dr.pr.gov/en/download/fair-housing-and-equal-opportunity-ftheo-policy-for-cdbg-dr-programs/>) and Spanish (<https://cdbg-dr.pr.gov/es/download/fair-housing-and-equal-opportunity-ftheo-policy-for-cdbg-dr-programs/>)

dr.pr.gov/download/housing-equity-and-equal-opportunity-policy-for-cdbg-dr/).

Regarding the proposed projects for the agriculture sector, we thank the Hispanic Federation for proposing three (3) programs that consider the need to incentivize agricultural activities and guarantee food security. These recommendations will be taken into account in the evaluation of the CDBG-MIT Action Plan. However, PRDOH is currently responsible for directing the Re-Grow PR Urban-Rural Agriculture Program under CDBG-DR funding. The Re-Grow Program promotes increasing food security throughout the Island and improving and expanding agricultural production related to economic revitalization and development activities. Among its various activities, the Program works to encourage crop diversification and increase the yield of agricultural produce that is consumed locally. To learn more about this Program, visit the PRDOH web page, where the Program Guidelines are available in English (<https://cdbg-dr.pr.gov/en/download/re-grow-pr-urban-rural-agriculture-program/>) and Spanish (<https://cdbg-dr.pr.gov/download/rebirth-agricultural-program-of-pr-urban-and-rural/>).

The Community Energy and Water Resilience Installations Program comprises three subprograms: the Home Energy Resilience Improvements Subprogram, the Incentives subprogram, and the Community Installations Subprogram. The Home Energy Resilience Improvement and Incentive subprograms work under a single, unified structure known as the Community Energy and Water Resilience Installations Program (CEWRI-HH). This Program used to include the installation of water storage systems, however, the Program was amended through the First Substantial Amendment to the CDBG-MIT Action Plan to focus on addressing the energy needs of low- to moderate-income communities. In the Second Substantial Amendment to the CDBG-MIT Action Plan, PRDOH modified the eligibility criteria for the Incentives subprogram to specify that assistance will be provided to households with urgent energy needs, including those who have a family member whose life depends on a machine to survive. Although the CEWRI-HH subprograms were amended to provide for the installation of renewable energy systems, the Community Installations Subprogram will allow the selected communities to receive a water storage system. Also, although the Second Substantial Amendment to this Action Plan also modified the Community Installations Subprogram to provide a greater focus on addressing energy needs, the installation of water storage systems was preserved to ensure these communities can sustain themselves during and after a disaster event. PRDOH adjusted the subprogram narrative to inform a direct selection will be made to assist the communities that were among the last to receive electric power services after Hurricanes Irma and María. This change was made thanks to the recommendations made by the Hispanic Federation, as well as by other interest groups.

We also appreciate the Hispanic Federation's support for planning programs, and we will consider their recommendations. PRDOH wishes to note that, under the Mitigation and Adaptation Policy Support Program, nonprofit organizations are listed as eligible to participate in the process

to select a subrecipient to assist PRDOH in implementing the Program's goals and objectives.

As for the Infrastructure Mitigation Program, the projects under this program, regardless of the method for selection, are evaluated to determine their compliance with the eligibility requirements established by CDBG-MIT. These requirements include the risks and vulnerabilities they address, the low- to moderate-income communities that benefit from them, as well as benefits provided and the strengthening of lifelines, among many other criteria assessed. Regarding the transparency of the Program's processes, the substantial amendments to the Action Plan provide information on the covered projects that were selected to obtain input from citizens and stakeholders. In addition, the PRDOH team has been actively sharing documentation regarding the program design (such as the Program Guidelines) with the CAC and evaluating each of the comments received from this entity representing the community. As part of the process to evaluate recommendations, PRDOH asks the Hispanic Federation to share information regarding individuals who could serve as "*representatives of public interest that the people trust overwhelmingly*" to discuss how they could be incorporated into this public engagement process.

Lastly, we welcome the feedback provided by your federation regarding the Multi-Sector Community Mitigation Program (MSC). PRDOH agrees this program is highly essential because it provides socially vulnerable communities (or community sectors) who are experiencing socioeconomic and environmental disadvantages with assistance to relocate to a non-high-risk area. The types of projects to be implemented in the communities that will participate in this program will be determined through the Participatory Design processes. The intention of the Program is to implement projects that benefit all residents of the participating community, to provide them with a better housing opportunity, and to keep them united and informed during the different phases of project planning and implementation. On the other hand, we emphasize the MSC Program will focus on vulnerable communities wishing to (voluntarily) relocate out of risk zones. This would be the optimal solution considering the vast majority of vulnerable communities that have suffered damage from past disasters are located in high-risk areas (such as flood zones, coastal areas threatened by erosion or storm surges, areas prone to landslides or liquefaction, among other risks). For more detailed information about the application process and eligibility criteria, visit the CDBG-MIT web page for the Program Guidelines available in English and Spanish at: <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) or <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish), respectively.

030

Comment
ID:

03/19/23_WP_I_Jose Arturo Montalvo Rivera(1)

The purpose of this letter is to emit comments on the CDBG-MIT proposal to the US Federal Government by the Government of Puerto Rico. Given the 4 strategies identified in the proposal, I have developed a series of comments that may already be included or not. Please, review these comments and if you have any questions regarding any of these, do not hesitate to contact me directly. Also, note that the comments are general in scope, and due to the size of my company, they could be improved upon a more careful discovery process as well as evaluation. If you wish to receive specific recommendations and action plans for any of the opportunities identified among my comments, you may contact me as well.

Regarding the Plan in general

It is my understanding that the proposal includes four strategies that aim to allocate 8.285 billion dollars of federal funding into multiple programs to enhance emergency response and resilience. Let me explain each strategy in more detail.

The first strategy, Capacity Building, is focused on increasing planning and implementation capacity for entities and citizens, while emphasizing the importance of continued planning, transparency of information, and data sharing. This strategy also seeks to promote the adoption of policies and procedures that reflect municipal and regional priorities with long-lasting effects on community risk reduction.

Comment:

The second strategy, Community and Regional Investment, aims to reduce the conditions of risk through community and regional level projects that identify transformative mitigation opportunities for vulnerable communities. This strategy intends to reduce the displacement of individuals by investing in infrastructure projects that improve community resilience and social safety net programs that help vulnerable communities mitigate the impacts of disasters and emergencies.

The third strategy, Lifeline Stability and Strengthening, aims to prioritize infrastructure improvements that avoid or reduce the disruption of essential services while promoting sustainability. This strategy seeks to invest in critical lifeline infrastructure such as water, energy, transportation, and communication systems, including the use of renewable energy sources and the adoption of smart grid technologies.

The fourth strategy, Alignment of Capital Investments, aims to align CDBG-MIT programs and projects with other planned federal, state, regional, or local capital improvements. This strategy intends to coordinate capital investments and ensure that CDBG-MIT programs and projects are aligned with other planned investments by establishing partnerships, providing technical assistance, and establishing performance metrics to track progress.

Overall, the proposal intends to reduce the risk of disasters and emergencies, promote resilience, and lead to more equitable and sustainable outcomes for individuals and communities.

Greetings Jose Arturo Montalvo Rivera:

The PRDOH team appreciates your recommendations on the Second Substantial Amendment to the CDBG-MIT Action Plan. CDBG-MIT funds focus on building disaster resilience and reducing or eliminating the long-term risk of loss of life and damage or loss of property. Through the CDBG-MIT Action Plan, PRDOH established nine (9) programs with three (3) subprograms and two (2) dedicated set-asides to provide mitigation solutions for the housing, infrastructure and planning sectors.

Among the PRDOH programs is the Multi-Sector Community Mitigation Program (MSC), which provides opportunities for socially vulnerable communities to relocate out of the high-risk area. Likewise, the program ensures communities are kept together in order to minimize the impacts of risk-reduction activities that might otherwise displace people or disrupt communities. Included among the communities the MSC Program will be assisting, there is a set aside of funds for the Caño Martín Peña Community. The community of Caño Martín Peña is currently living with an environmental crisis affecting more than 26,000 residents who are living below the poverty line and suffer from recurrent flooding. For this reason, PRDOH, through the MSC Program, will assist these communities by implementing specific projects that will better serve their residents' housing needs.

PRDOH Response:

In addition, the Social Interest Housing Mitigation Program is available to eligible organizations which have demonstrated expertise in working with the populations that will be served under this housing program, such as homeless persons, elderly persons, victims of domestic violence, persons with intellectual disabilities, persons with physical and/or developmental disabilities, persons living with HIV/AIDS, persons recovering from addiction, and persons with other functional or access needs. The Program will serve these vulnerable populations according to their mitigation needs, which may vary according to geographic location and specific hazards.

With regard to infrastructure projects, PRDOH has the Infrastructure Mitigation Program, which aims to strategically identify risk areas and mitigate the greatest risk to the greatest number of people in a cost-effective manner. Through this Program, PRDOH will be providing funding for projects that support the reinforcement, modernization, replacement, or construction of water/wastewater infrastructure. Construction improvements must incorporate alternative energy equipment and technology, and improve, expand, or build medical and healthcare facilities to reinforce and modernize buildings and permanent equipment, among others. Through the Second Substantial Amendment to the CDBG-MIT Action Plan, PRDOH submitted the Patillas Dam Seismic Retrofit Covered Project, which aims to reduce the likelihood of seismic-induced embankment deformations that could result in a dam rupture with uncontrolled reservoir spillage and downstream flooding. This Covered Project will help prevent a catastrophic embankment loss, as well as reduce the risk of flooding for the communities located in the municipality of Patillas.

In terms of planning strategies, PRDOH is responsible for managing the following programs under CDBG-MIT funds: The Risk and Asset Data Collection (RAD) Program, the Mitigation and Adaptation Policy Support Program, and the Planning and Capacity Building Program (PCB). The RAD Program aims to generate risk, hazard, and asset information layers to supplement the cadastral and land use information generated under the Puerto Rico Geospatial Framework Program (GeoFrame) under CDBG-DR funds. Likewise, this Program intends to increase the capacity of citizens, the industry and private commerce sector, mayors, governors, and other leaders to make data-driven decisions based on a comprehensive and up-to-date knowledge of the risks, hazards, and assets on the Island.

In the Mitigation and Adaptation Policy Support Program, PRDOH will make use of information gathered through the stakeholder engagement process for the Action Plan, Disaster Recovery Planning Programs, including Municipal Recovery Planning Program, Whole Community Resilience Planning Program, and GeoFrame Program under CDBG-DR funds. Policy adaptation and support refers to the use of policy, Building Code, Land Use Plans, scoring, and planning and capacity building interventions to improve the ability of local jurisdictions and communities to prepare and plan for, avoid, absorb, recover from, and most successfully adapt to potential risks from hazardous events.

Finally, the PCB Program will help increase the capacity of existing state agencies, municipalities, non-governmental organizations, and regional partnerships by helping to create and/or reinforce and formalize existing regional consortia to carry out activities to increase mitigation. The Program was designed using the Unified Strategy for Capacity Building. The Program Guidelines will describe the implementation and address the planning activities mentioned in your letter, such as technical assistance, support to local initiatives, and promotion of better data. Once the PCB Program Guidelines are published, we encourage you to review and submit your comments. The PCB Program will have two main components: capacity-building workshops and competitive rounds for surveys, plans, and consortia. By doing so, PRDOH intends to meet the expected results of the PBC Program.

PRDOH is also responsible for the Municipal Recovery Planning Program (MRP) under CDBG-DR funds. The MRP Program aids municipalities in order to carry out planning activities addressing conditions created or exacerbated by Hurricanes Irma and María. Through this program, PRDOH, along with the municipalities, has made great strides in community planning to prepare municipal governments for the development of future recovery and/or mitigation strategies.

Regarding the subrecipient selection process, PRDOH follows a formal process to select the most suitable and qualified subrecipients to assist in managing the CDBG-DR/MIT Programs; this process is in line with federal regulations. Also, each subrecipient is responsible for complying with federal cost principles and procurement standards. To ensure

compliance, PRDOH has a solid internal audit and subrecipient monitoring team to prevent any fraud, waste, abuse, or mismanagement. To report any type of fraud, waste, abuse, or mismanagement involving the CDBG-DR/MIT programs, visit the PRDOH web page at [https://cdbg-dr.pr.gov/app/cdbgdrpublic/Fraud___\(English\)](https://cdbg-dr.pr.gov/app/cdbgdrpublic/Fraud___(English)) or [https://cdbg-dr.pr.gov/app/cdbgdrpublic/Fraud/IndexES_\(Spanish\)](https://cdbg-dr.pr.gov/app/cdbgdrpublic/Fraud/IndexES_(Spanish)) to complete an official form.

The PRDOH team is committed to working on strengthening our communities through housing, infrastructure, and planning projects that promote resilience and reduce loss of life in the face of future disasters. For more information on the programs available under CDBG-MIT funds, we encourage you to visit the PRDOH web page where you will find the Program Guidelines available in English and Spanish at: <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) and <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish), respectively.

031	Comment ID:	03/19/23_WP_I_Jose Arturo Montalvo Rivera(2)
	Comment:	<p>Regarding Strategy 1 "Capacity Building"</p> <p><i>I believe that achieving the goals of the first strategy, Capacity Building, will require a multifaceted approach that promotes planning and implementation capacity while emphasizing transparency, information sharing, and the adoption of policies and procedures that reflect municipal and regional priorities.</i></p> <p><i>To promote planning and implementation capacity, the proposal could allocate funding towards various initiatives such as:</i></p> <ol style="list-style-type: none"><i>1. Providing technical assistance to municipalities and regional organizations to improve their planning and implementation capacity by sharing best practices, training programs, and knowledge resources.</i><i>2. Supporting the development of community-led initiatives that prioritize local capacity building and planning efforts, such as community resilience plans and vulnerability assessments.</i><i>3. Creating forums and platforms for stakeholders to engage in collaborative planning and data sharing, such as interagency task forces and open data portals.</i> <p><i>To emphasize transparency and information sharing, the proposal could allocate funding towards initiatives such as:</i></p> <ol style="list-style-type: none"><i>1. Supporting the development of standardized data and information sharing protocols that promote transparency and facilitate communication between stakeholders.</i><i>2. Creating incentives for stakeholders to share data and information through funding mechanisms that prioritize data-driven decision-making and open data policies.</i>

3. Providing training and technical assistance to stakeholders on data management and sharing practices to ensure that data is accessible, accurate, and reliable.

Finally, to promote the adoption of policies and procedures that reflect municipal and regional priorities, the proposal could allocate funding towards initiatives such as:

1. Supporting the development of model policies and procedures that reflect best practices in community risk reduction and mitigation, and encouraging municipalities and regional organizations to adopt these policies.

2. Creating incentives for municipalities and regional organizations to adopt policies and procedures that promote transparency, equity, and community engagement in the planning process.

3. Providing technical assistance and capacity building resources to support the adoption and implementation of policies and procedures that reflect local priorities and values.

By implementing these initiatives, the proposal can achieve the goals of the first strategy and promote planning and implementation capacity while emphasizing transparency, information sharing, and the adoption of policies and procedures that reflect municipal and regional priorities.

Greetings José Arturo Montalvo Rivera:

PRDOH Response:

Your first comment along with your letter was received and answered in box number thirty (30) under comment ID: 03/19/23_WP_I_Jose Arturo Montalvo Rivera(1). PRDOH appreciates your interest in this amendment to the CDBG-MIT Action Plan. For more information on CDBG-MIT funds, please visit the PRDOH website, available in English and Spanish, at: <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) or <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish), respectively.

032

Comment ID:

03/19/23_WP_I_Jose Arturo Montalvo Rivera(3)

Comment:

It is essential to address the critical issue of corruption in the subrecipient selection process for the Community Energy and Water Resilience Program in Puerto Rico. The current system, which relies on the lowest price offered by potential subrecipients, is flawed and could lead to corrupt practices.

To mitigate this risk, it is recommended that the government of Puerto Rico establish a transparent and standardized pricing system for all subrecipients. The pricing system should be based on market rates and consider the technical expertise of potential subrecipients.

In addition, it is crucial to implement safeguards to prevent the government from sharing confidential information with corrupted corporations. This could be achieved by establishing strict guidelines for data security and implementing penalties for breaches of confidentiality.

Finally, it is recommended that the program be monitored through oversight mechanisms such as regular audits and evaluations to ensure that it is achieving its intended objectives and that the benefits are reaching the most vulnerable communities.

Overall, it is crucial to take immediate action to address the potential for corruption in the subrecipient selection process. By implementing a fair and transparent pricing system, selecting subrecipients based on technical expertise, and establishing strong safeguards and oversight mechanisms, the Community Energy and Water Resilience Program can be implemented in a way that maximizes its benefits for the people of Puerto Rico while minimizing the risk of corruption.

Greetings José Arturo Montalvo Rivera:

PRDOH Response: Your first comment along with your letter was received and answered in box number thirty (30) under comment ID: 03/19/23_WP_I_Jose Arturo Montalvo Rivera(1). PRDOH appreciates your interest in this amendment to the CDBG-MIT Action Plan. For more information on CDBG-MIT funds, please visit the PRDOH website, available in English and Spanish, at: <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) or <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish), respectively.

033	Comment ID:	03/20/23_WP_NGO_SESA-PR_PJ Wilson(1)
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March 19th, 2023
Hon. William Rodríguez
Secretary
Department of Housing
Commonwealth of Puerto Rico

RE: SESA-PR COMMENTS TO CDBG-MIT ACTION PLAN SUBSTANTIAL AMENDMENT, "COMMUNITY ENERGY AND WATER RESILIENCE INSTALLATIONS PROGRAM"

To the Honorable Secretary:

Comment: Comes now SESA-PR, the Solar and Energy Storage Association of Puerto Rico, to comment the Puerto Rico Housing Department's (Vivienda) substantial amendment to the Action Plan for Community Development Block Grant-Mitigation (CDBG-MIT) proposed on 12/17/23:

Summary of the comments:

SESA's overarching comments and urgent requests are:

1. Process: It is unclear why these changes are being proposed, as no specific stakeholder input has been procured prior to announcement. It is an inefficient and ineffective use of federal dollars to propose substantial changes without stakeholder input.

2. *Substance: The language proposed to be deleted originally intended the installation of larger (up to \$2 million) storage systems with medium-sized solar systems, which provide stable power during blackouts, and could also help energize households in those communities during normal times. These larger community systems could operate off-grid during outages and save the lives of the families who reside in homes where individual solar and storage is impossible to install directly due to lack of structural integrity of homes, too much shading for solar to be feasible, and other reasons. Vivienda must not disregard people who reside in homes whose poor condition or lack of adequate sunshine impedes individual installations of solar+storage systems.*

3. *Duplicity: Given the already-existing program for Very Low Income within this same \$500M budget of CDBG-MIT, plus the new \$1B in DOE funds focused on Low Income, this proposed amendment appears creates confusion, duplicity, and could therefore threaten the deployment all 3 streams of funding from moving forward.*

4. *Request for extension of time for public comments, and a series of stakeholder engagement meetings.*

Dear President PJ Wilson and members of SESA-PR:

We acknowledge receipt of your recommendations for the Second Substantial Amendment to the CDBG-MIT Action Plan. We thank your association for taking the time to review and comment on this proposed amendment to the CDBG-MIT Action Plan. According to the Federal Register Vol. 84, No. 169 (August 30, 2019), 84 FR 45838, PRDOH must provide a 30-day period to receive recommendations and input from citizens and stakeholders on the proposed changes under a substantial amendment to the CDBG-MIT Action Plan. The Second Substantial Amendment to the CDBG-MIT Action Plan was available for public comment for a period of thirty (30) from February 17 through March 19, 2023. This comment period provided individuals and stakeholders with the opportunity to submit their comments and recommendations, while balancing the need for timely implementation of these critical programs.

PRDOH Response:

Through this substantial amendment, PRDOH incorporated several changes to the Community Installations Subprogram to focus more on electric power installations to provide assistance to vulnerable communities lacking power for extended periods of time. These communities will be directly selected by the subprogram through a specific outreach strategy to offer them the opportunity to collectively ensure their well-being through resilience improvements which may include the installation of water storage and photovoltaic systems with battery storage, at capacities aligned with household needs. PRDOH will ensure the power needs of these families, who were among the last households to receive electricity services, will be met, taking into account that the structure of each home may vary from case to case. However, we urge the members of SESA-PR to provide any additional feedback to

ensure the power needs of those families on the Island who need it the most are met.

With regard to the duplication of funds, PRDOH is responsible for complying with the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended, 42 U.S.C. § 5121 *et seq.*, which sets forth the requirements for duplication of benefits analysis. The Stafford Act prohibits individuals, businesses, or other entities from receiving federal funds to cover all or part of a loss for which they have already received financial assistance from any other program, private insurance, charitable assistance or any other source. As administrator of both CDBG-DR and CDBG-MIT funds, PRDOH established the Duplication of Benefits Policy to ensure beneficiaries and subrecipients comply with the federal requirements established by the U.S. Department of Housing and Urban Development (HUD). For more information on the Duplication of Benefits Policy, visit the PRDOH web page available in English and Spanish at: <https://cdbg-dr.pr.gov/en/download/duplication-of-benefits-policy/> (English) and <https://cdbg-dr.pr.gov/download/politica-sobre-la-duplicacion-de-beneficios/> (Spanish).

034	Comment ID:	03/21/23_E_GE_Puerto Rico Public-Private Partnership Authority and the Puerto Rico Ports Authority_Fermín Fontanés Gómez and Joel A. Pizá Batiz(1)
		<p>March 21, 2023 VIA EMAIL: w.rodriguez@vivienda.pr.gov Hon. William Rodriguez Rodríguez Secretary Puerto Rico Department of Housing PO Box 21365 San Juan, PR 00928-1365 Re: San Juan Bay Pier 1 Development Project - Comments to the Second Amendment to the Puerto Rico Community Development Block Grant Mitigation Action Plan Dear Secretary Rodríguez,</p>
	Comment:	<p>The Puerto Rico Public-Private Partnership Authority (the "Authority") and the Puerto Rico Ports Authority ("PRPA") hereby jointly submit comments to the Second Amendment to the Puerto Rico Community Development Block Grant Mitigation ("CDBG-MIT") Action Plan (the "Second Amendment") in the form of a description of the Pier 1 Development Project (see Exhibit A) to be included in Part D of the Second Amendment, Proposed Mitigation Projects. The deadline established by the Puerto Rico Department of Housing ("PRDOH") for the submission of public comments expired on Sunday, March 19, 2023. While the undersigned attempted to submit the comments to the Second Amendment prior to Sunday, March 19, 2023, they were unable to do so for reasons beyond their control. Accordingly, the Authority and the PRPA submit their comments to the Second Amendment via this letter for PRDOH's review and incorporation into the Action Plan.</p>

Following the destruction brought by Hurricanes Irma and María (together the "Hurricanes") in 2017, PRPA has been in the process of repairing, improving, and strengthening Piers 1, 3, 4, 11 through 14, and Pan American Piers 1 and 2 in San Juan Bay (collectively, the "San Juan Cruise Port Project"). As part of the PRPA's effort to obtain funding for improvements at the San Juan Cruise Port Project, the PRPA, in conjunction with the Authority, undertook a competitive procurement pursuant to the Public-Private Partnership Act, Act 29-2009, as amended ("Act 29") for the selection of a private, for-profit entity organized under the laws of the Commonwealth of Puerto Rico (the "Concessionaire") for a 30-year concession to repair, design, build, finance, maintain, and operate the San Juan Cruise Port under a public-private partnership agreement (the "PPP Agreement") with the PRPA – Pier 1 Development Project is part of the San Juan Cruise Port Project. PRPA's effort seeks to improve the cruise terminals functionality, harden critical infrastructure from future disaster damage, and support the island's tourism industry.

In light of the above and given the importance and potential impact of Pier 1 Development Project, the Authority and PRPA kindly requests PRDOH's review and incorporation of the comments hereby submitted into the Second Amendment.

Cordially,

Fermín Fontanés Gómez
Executive Director
Puerto Rico Public-Private Partnership Authority

Joel A. Pizá Batiz
Executive Director
Puerto Rico Ports Authority

Dear Mr. Fontanés Gómez and Mr. Pizá Batiz:

PRDOH appreciates the participation of the Public-Private Partnerships Authority and the Puerto Rico Ports Authority during the public comment period for the Second Substantial Amendment to the CDBG-MIT Action Plan.

PRDOH Response:

Based on the information provided by your agencies, the San Juan Bay Pier 1 Development Project could be aligned with the objectives of the Economic Development Investment Portfolio for Growth Program (IPG-MIT). The IPG-MIT Program is a variation of the Economic Development Investment Portfolio Program under CDBG-DR funds. Unlike the program established under CDBG-DR funds, the IPG-MIT Program focuses on mitigation in order to identify funding for private lifeline infrastructure to support risk-based mitigation needs. The IPG-MIT program will consider the projects submitted by your agencies, and will analyze the potential economic benefits these projects would provide to the area that encompasses the Puerta de Tierra dock, including Pier 1 in San Juan Bay.

We also encourage you to visit the PRDOH web page where you will find the IPG-MIT Program Guidelines, which include more information on the application process, eligibility requirements, among other details. You can also consult the Program Guidelines posted in English and Spanish at: <https://cdbg-dr.pr.gov/en/economic-development-investment-portfolio-for-growth-lifeline-mitigation-program/> (English) and <https://cdbg-dr.pr.gov/programa-de-cartera-de-inversion-en-desarrollo-economico-y-crecimiento-mitigacion-en-lineas-vitales/> (Spanish), respectively.

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Comment ID:

03/22/23_E_NGO_Firmes, Unidos y Resilientes con la Abogacía, Inc._Nayda Bobonis Cabrera(1)

March 19, 2023

Sr. William Rodríguez

Secretary

Puerto Rico Department of Housing LegalCDBG@housing.pr.gov

RE: Comments Second Substantial Amendment CDBG-MIT Action Plan

Firmes Unidos y Resilientes con la Abogacía, (FURIA, Inc.) is a non-profit organization dedicated to supporting community leaders across the archipelago of Puerto Rico in their fight for the right to decent housing and conditions that guarantee the well-being and safety of our people. Our organization assists the leadership by promoting resilience through participatory advocacy, offering educational services and promoting the appropriate involvement of our members in the processes that concern and affect them.

Comment:

Over the past few years, we have been closely following the country's recovery process, which still requires a lot of work to address the needs that persist in our communities and to ensure that we are prepared for the next emergency, both on an individual and collective level. As we have noted before, many people still live in unsafe homes, and at the collective level, planning processes to ensure the resilience of communities have not yet taken place. This is why the CDBG-MIT Plan under the Department of Housing (hereinafter, PRDOH) is so relevant, as it has the potential to support the issues that have not yet been addressed and prepare our people for future disasters. With this in mind, we submit the following comments to the Second Substantial Amendment for your evaluation.

General Comments

- **We reiterate the importance of prioritizing denied or unprocessed cases under R3** - As discussed above, the R3 Program has not fulfilled its purpose of covering the need for housing in the aftermath of Hurricanes Irma and Maria. The program has not worked smoothly, and many cases have not been processed or have been denied assistance. We must make sure that thousands of people receive the PRDOH assistance that they desperately need over five years after the natural disasters. We reiterate that

cases that have not yet been addressed should be considered under CBDG MIT.

- **We reiterate the importance of guaranteeing transparency to ensure healthy ties with citizens:** Given that transparency is a pillar of trust in government work, we suggest that the way in which information is provided to the public be reviewed. We recognize the progress that has been made with the transparency portal and program reports, however, we must ensure that the information is easily accessible and understandable. Also, as mentioned in previous comments, we request that a quarterly operating and maintenance cost plan reporting requirement be reinstated for applicants under the Operations and Maintenance subsection of the General Requirements section. They are required to include a narrative plan detailing all resources needed for the operation and maintenance costs for CDBG-MIT assisted projects, therefore providing a clearer picture of how these projects are doing.

Infrastructure Mitigation Program

This program will address large-scale risks to alleviate the concerns of countless communities around the country. It is specified that “[t]he Program will require projects to be aligned with the public interest in order to result in mitigated conditions or a wide-ranging impact through the strengthening of the vital line or redundancy for critical and essential facilities.” It also clarifies that they will be “...evaluated according to their degree of preparation” thereby including details of the plan and its implementation, design and the fact that it does not “result in the displacement of people or companies through their acquisition in order to be completed”, as well as environmental impact, etc.

Considering the importance of citizen engagement in high impact projects such as these, PRDOH must ensure the active participation and input of residents around the area to be impacted in the design and planning process. This will ensure that you have a holistic view of what you intend to implement and will have support in the process.

We bring up the concern about this program when it indicates that “[a]ssistance for private public service companies” is eligible. We understand that private companies could play an important role in these types of projects, but at the same time we must also keep in mind the negative experiences we have had with the intervention of private companies, especially in relation to essential services. In order to safeguard the public treasury and recognizing that on many occasions they have not met expectations, it will be essential to reaffirm the processes of transparency and oversight for the use of these funds.

Single-Family Housing Mitigation Program

The amendment proposes to include as eligible beneficiaries “...individuals with an ownership interest in the occupied structure (including alternative

methods of verifying informal ownership), as well as occupants, owners, or users of structures located in an identified and documented high-risk area including, but not limited to, a FEMA flood zone." We recognize this as a major step forward in ensuring that resources reach the most vulnerable people. We stress the importance of continuing to train staff to recognize these methods, both for their application in case management and so that they can share the information adequately with potential beneficiaries of the program.

In addition to this, an amendment included is not clear and can lead to confusion. It states that "...when an applicant with a relocation voucher chooses a home in a PRDOH housing development, PRDOH may waive the voucher limit." It is unclear whether PRDOH will assume the difference in the cost of the residence or whether the difference in amount will be added to the voucher in order to complete the transaction. In this regard, it is important to clarify that PRDOH will assume the extra cost, and we reiterate the importance of being prudent in the use of funds, considering that housing developed by the Agency should be affordable and not detract from the opportunity to provide funds to other families in need.

Multi-Sector Community Mitigation Program

We consider this to be one of the most important programs in the CBDG MIT portfolio. Community planning has proven to be fundamental to the resilience and permanence of the social fabric in our communities. We recognize the inclusion of community input as an important achievement for the success of these initiatives, as well as the language it expresses as an advantage:

"Keeping communities together – Respect and safeguard the integrity of each community by involving residents in all phases of the relocation project development (from design to implementation). Together, identify the community's values, priorities, and needs, ensuring that they inform the project and keep the essence of the community intact in the process."

In this regard, we would like to stress the importance of considering the option to stay after the available mitigation measures, allowing the community to choose the relocation process as an option after a responsible analysis of all the factors. Open and direct communication with the community will ensure true respect for their autonomy.

Another observation is that the amendment explains that "[t]he PRDOH providers and contractors will execute the final MSC Program projects selected by PRDOH, which will be based primarily on the highest percentage of community and stakeholder support, as well as project feasibility considerations. The Program Guidelines will describe in more detail how the Program will assess community support." Clarity and specifics about how the consultation and supporting metrics will be delivered, and how all voices will be heard in the process, is a prerequisite for achieving the program's mission. That is why we suggest that this evaluation be made part of the Plan and not only as part of the guidelines.

Finally, it states that "[the] MSC Program will identify communities at risk and promote assistance from entities willing to collaborate with these socially vulnerable communities (or community sectors) that experience socioeconomic and environmental disparities and have expressed a desire to reduce environmental risks and mitigate loss of life and property through relocation." We suggest integrating grassroots and nonprofit organizations that work with communities in the process of identifying those at-risk communities, organizations that have direct experience and can contribute a clearer vision in this regard.

Economic Development Investment Portfolio for Growth – Lifeline Mitigation Program

The substantial amendment describes the evaluation process as described under the Infrastructure Mitigation Program, indicating that they will be evaluated on the basis of their degree of preparedness and other elements. In this regard, we again suggest that the planning and design process ensures the active participation of the residents and communities where the project will be implemented.

Community Energy and Water Resilience Installations Program

We consider and reiterate that addressing the water access problems in the country should be a priority, especially in support of the community water supply systems who make an extraordinary effort to supply their neighbors with this essential service, with hardly any resources. The suggested amendment appears to place this need for systems support as a secondary priority to focus the program on energy issues and individual assistance. We believe that both are important, so we suggest that the activities carried out through community water systems or community aqueducts be made eligible in order to guarantee the support that they still need so much. Additionally, we recommend that their input be considered in the data collected in addition to that of "PREPA, LUMA, the University of Puerto Rico and the Department of Energy and its Laboratories". Considering grassroots and nonprofit organizations with knowledge on the subject would guarantee a broader perspective of the needs and solutions to the problem.

Conclusion

The communities are keeping an eye out for the programs under CDBG MIT to begin work. Unfortunately, the delay in starting these efforts means that almost six years after the hurricanes, there is still much work to be done to ensure the safety and stability of our people. With less than three months to go before a new hurricane season, we are not ready to receive another atmospheric event, which is why it is critical to act quickly, but also to be aware of how we take action on the funds that are so necessary to meet the needs we are still facing, as well as transparency in the process. Only in this way will we be able to achieve the well-being that our people need and to which they are entitled.

If you have any questions you can contact us at 787-210-6189 or email nbobonis@gmail.com or furia.puertorico@gmail.com.

Ms. Nayda Bobonis Cabrera
Executive Director

Dear Members of Firms Unidos y Resilientes con la Abogacía, Inc:

PRDOH appreciates your participation during the public comment period for the second substantial amendment to the CDBG-MIT Action Plan. Your recommendations have been registered, and will be taken into consideration for the evaluation of this amendment.

The Home Repair, Reconstruction or Relocation Program (R3 Program) under the CDBG-DR Action Plan offers eligible applicants the opportunity to receive assistance for the reconstruction and repair of their homes affected by Hurricane Irma and Maria. Similarly, the R3 Program also provides relocation services for homes located in at-risk zones. Through the R3 Program, PRDOH has been able to serve several families around the Island with the purpose of providing a safe and secure home. The PRDOH team is committed to securing decent housing for those impacted by the hurricanes. However, we recognize the importance of ensuring these services are available to the most in need families on our Island, which is why we emphasize every R3 Program applicant has the right to file a Reconsideration to the Program or an Administrative Review directly with PRDOH. To learn more about the reconsideration process, visit PRDOH web page where you will find the Program Guidelines available in English and Spanish at: <https://cdbg-dr.pr.gov/en/download/home-repair-reconstruction-or-relocation-program/> (English) and <https://cdbg-dr.pr.gov/download/reconstruction-or-relocation-program/> (Spanish), respectively.

PRDOH Response:

In addition, under the CDBG-MIT funds, PRDOH developed the Single Family Housing Mitigation Program (SFM Program). The SFM Program aims to assist homeowners with immediate threats to their homes and livelihoods. The Program's objective is to ensure the unmet mitigation needs of low- and moderate-income persons from the most impacted and affected populations are addressed. Likewise, this program is intended to assist homeowners who are still living with a "blue roof" or living in high-risk areas. The SFM Program has a specific approach to reach these populations identified through the study executed in the Blue Roof Survey Program under CDBG-DR funds. Regarding the SFM Program relocation vouchers, the following language was added in the PRDOH Action Plan: *"In addition, when an applicant with a relocation voucher chooses housing in a PRDOH housing development, PRDOH could waive the voucher limit."* This language was proposed to clarify that if an applicant chooses an available home within a PRDOH housing development, the applicant will be able to purchase this property even if the price exceeds the amount awarded through the relocation voucher. To learn more about the requirements and services of the SFM Program, see the Program Guidelines available in English and Spanish on the PRDOH website at: <https://cdbg-dr.pr.gov/en/download/single-family-housing->

[mitigation-program-sfm-program/](https://cdbg-dr.pr.gov/download/single-family-housing-mitigation-program-sfm/) (English) and <https://cdbg-dr.pr.gov/download/single-family-housing-mitigation-program-sfm/> (Spanish).

On the other hand, the Infrastructure Mitigation Program aims to strategically identify risk areas and mitigate the greatest risk for the greatest number of people in a cost-effective manner through projects that benefit low- and moderate-income communities. PRDOH recommends all Program applicants seek community support for proposed projects, which includes reference documentation or support letters from community organizations or leaders representing the project area or community to be benefited. Likewise, we emphasize that non-governmental organizations and nonprofit entities are eligible to participate in the Program as long as they comply with the requirements established in the Program Guidelines. For details on the Program's application process, visit the PRDOH web page available in English and Spanish at: <https://cdbg-dr.pr.gov/en/infrastructure-mitigation-program/> (English) and <https://cdbg-dr.pr.gov/program-for-infrastructure-mitigation/> (Spanish).

Like the Infrastructure Mitigation Program, the Economic Development Investment Portfolio for Growth Program (IPG-MIT) also encourages applicants to obtain community support for proposed projects. This supporting documentation will be considered in the evaluation of projects, in addition to the federal requirements established by the Department of Housing and Urban Development (HUD). For more information on eligibility criteria, refer to the Program Guidelines available in English and Spanish on the PRDOH web page at: <https://cdbg-dr.pr.gov/en/economic-development-investment-portfolio-for-growth-lifeline-mitigation-program/> (English) and <https://cdbg-dr.pr.gov/portfolio-program-of-investment-in-economic-development-and-growth-mitigation-on-lifelines/> (Spanish).

PRDOH appreciates your support for the Multi-Sector Community Mitigation Program (MSC). As part of the Program's priorities, PRDOH will be identifying those communities that reside in at-risk areas and will consider those proposals demonstrating the community's desire to proceed with relocation efforts. PRDOH recognizes how difficult it can be to carry out relocation activities without affecting the unity of the community, which is why various services will be offered to guide the community during each phase of the process. Among the eligible entities, PRDOH includes non-governmental organizations and nonprofit entities, who will also be evaluated according to the eligibility requirements to participate as subrecipients in the Program and carry out the proposed relocation project. For more information about the MSC Program, please refer to the Program Guidelines available in English and Spanish at: <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) or <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish).

Regarding the Community Energy and Water Resilience Installations Program (CEWRI-MIT), PRDOH wishes to clarify that the Community Installations Subprogram will be providing assistance for the installation of

water storage and renewable energy systems for the selected communities. These communities will be directly selected by the subprogram through a specific outreach strategy offering the opportunity to collectively ensure their well-being through resilience improvements that may include the installation of water storage and photovoltaic systems with battery storage, at capacities aligned with household needs. For more information about this program and the details of your application, please visit PRDOH web page where the Guidelines for the Community Installations Subprogram will be published soon at: <https://cdbg-dr.pr.gov/en/cdbg-mit/> (English) or <https://cdbg-dr.pr.gov/cdbg-mit/> (Spanish), respectively.